

COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 8

PLANNING APPLICATIONS COMMITTEE: 24 April 2019

Ward: Abbey

App No.: 182196/FUL

Address: Thames Quarter, Kings Meadow Road, Reading (AKA Former Cooper BMW, Kings Meadow Road, Reading)

Proposal: Erection of a part 13-storey, part 23 storey building comprising 338 apartments in a mix of studio, one-bedroom, two-bedroom and three-bedroom units, residents' lounges, tech-hub, dining room, and cinema room, various rooftop outdoor amenity spaces, concierge/reception with coffee meeting area, gym, residents' storage facilities, postroom, ancillary back-of-house facilities, 338 secure cycle parking spaces, car parking spaces, landscaping, and associated works (revision to planning permission 162166 dated 23/11/2017) (Part Retrospective).

Applicant: MG RPF Limited Partnership Thames Quarter Ltd and Lochailort Thames Quarter Ltd

Date received: 29 January 2019

13 Week target decision date: 30 April 2019

RECOMMENDATION:

Refuse Full Planning Permission for the following reasons:

1. The proposal, due to its excessive height and bulk, and inappropriate massing and proportions, would result in a scale and form of development which would conflict with the adopted tall buildings approach for the Central Area, overly extending beyond recognised benchmark heights, and cause harm to the visual amenity of the local area due to its over-dominant and incongruous relationship to surrounding streets and buildings. The proposal is therefore contrary to Policies CS7, RC1, RC5 and RC13 and guidance contained within the Reading Station Area Framework (SPD, 2010).

2. In the absence of a completed legal agreement to secure acceptable Affordable Housing provision, the proposal fails to contribute adequately to the housing needs of Reading Borough and the need to provide sustainable and inclusive mixed and balanced communities. As such the proposal is contrary to Policy CS16 of the Reading Borough LDF Core Strategy 2008 (altered 2015), Policy H4 of the Submission Draft Local Plan 2018 and Affordable Housing Supplementary Planning Document 2013.

3. The application fails to demonstrate that a suitable wind and microclimate environment will be achieved within and surrounding the site with consequent harm to the character, amenity and safety of occupiers of the development itself and surrounding area and contrary to Policies CS7, RC5, RC9, CS13, CS34, DM4 and DM10.

4. The application fails to demonstrate that access to suitable daylight and sunlight will be achieved within and surrounding the site with consequent harm to the character and amenity of the site and its surroundings. Contrary to Policies RC1, RC5, RC13 and DM4.

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

- (i) Land to facilitate the identified Mass Rapid Transit route along Napier Road/Kings

Meadow Road.

- (ii) A financial contribution towards improvements to Kings Meadow park;
- (iii) A financial contribution towards improvements to the Vastern Road railway underpass
- (iv) A financial contribution towards provision of a new signalised pedestrian crossing on Kings Meadow Road
- (v) A financial contribution towards provision of an on-site car club; and
- (vi) A suitable Employment, Skills and Training Plan, or appropriate alternative financial contribution to allow for employment, skills and training provision;

The proposal fails to contribute adequately to the employment skills and training needs of Reading Borough; appropriate highway improvements, leisure improvements and sustainable transport.

As such the proposal is contrary to Policies CS3, CS4, CS9, CS20, CS21, CS23, CS29, and of the Reading Borough LDF Core Strategy 2008 (altered 2015), Policies DM3, DM12, DM16, and SA16 of the Sites and Detailed Policies Document 2012 (altered 2015) and the Employment Skills and Training Supplementary Planning Document 2013.

Informatives:

Plans refused

No pre-app

Positive and proactive

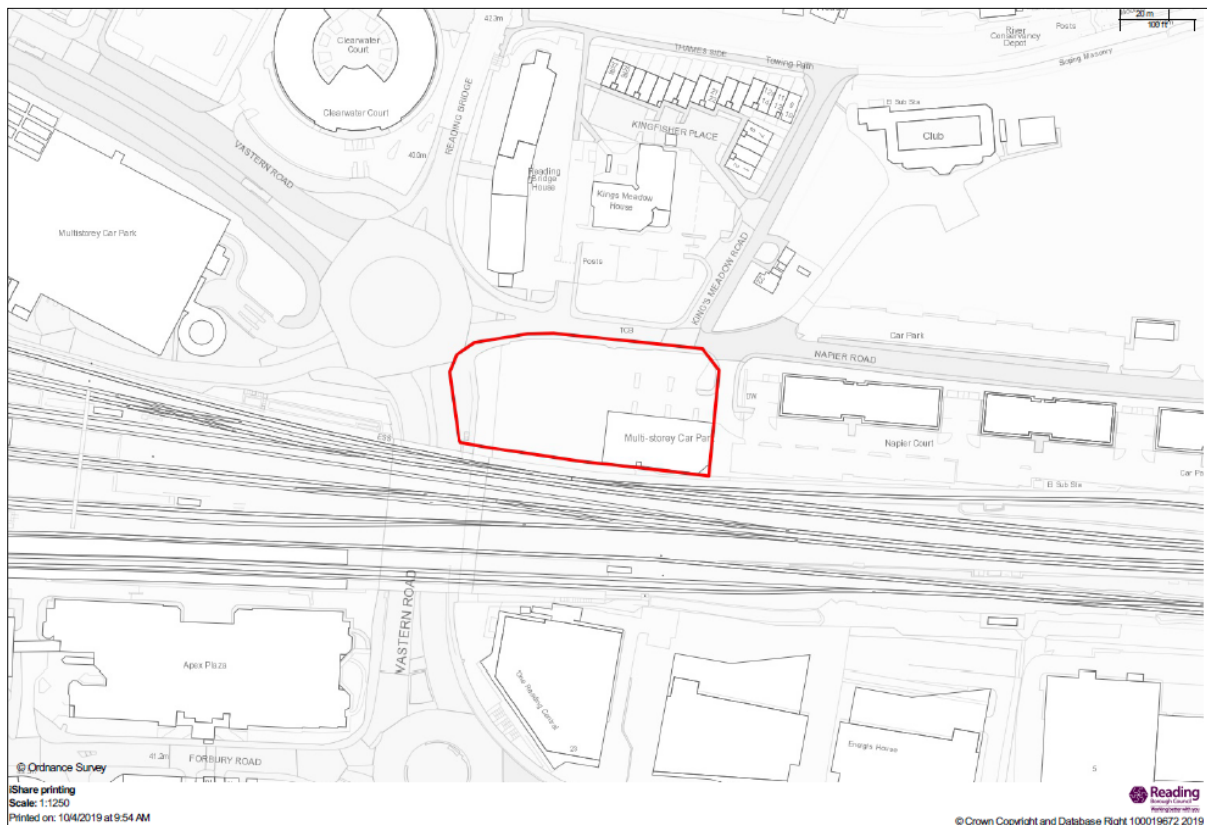
1. INTRODUCTION

1.1 The application site is a narrow piece of land adjacent to the north embankment of the Bristol-Paddington railway line at the edge of Central Reading. A building approved under permission 162166/FUL is currently under construction on the site (the current application proposes an enlargement of this). A car dealership occupied the site prior to this and this was demolished in 2016 to make way for a temporary car park for a short period. Vastern Road roundabout lies to the west at the junction of Vastern Road, George Street (Reading Bridge) and Kings Meadow Road. To the north is Reading Bridge House and Kings Meadow House (the Environment Agency building), and beyond that, on the banks of the Thames, is a residential development, Kingfisher Court. To the north-east of the site is a residential dwelling, 'The Lodge' and Kings Meadow, one of the town's Thames Parks. The park contains the Kings Meadow Baths which is Grade II listed and recently refurbished as the Thames Lido. To the east of the site is a two storey office development in a series of three blocks, known as Napier Court.



Site photograph looking approximately East from Vastern Road, showing progress on the lift core of permission 162166 (the lift core is now fully constructed to 23 storeys)

- 1.2 The application site is identified site in the Reading Central Area Action Plan (the RCAAP, 2009) as Site RC1h (Napier Road Junction) for a single landmark building for residential use, B1 office use, or a mixed use for both.



Location plan (not to scale)

2. PROPOSAL

2.1 Full planning permission is sought, part retrospectively, for a building made up of two sections. A ‘horizontal’ residential block rising to 13 storeys, with a 23-storey residential tower at the western end. The development leaves an area to the north and west frontages of the application site for landscaping/public realm and to accommodate future highway improvements at the end of Kings Meadow Road as part of the East Reading MRT route. It is proposed to accommodate 338 dwellings to be let long-term under a Build-to-Rent (BTR) tenure.

2.2 The proposal is complicated somewhat by the construction of the building approved under 162166. The lift and stair core to the 23 storey tower appears to be mostly complete. Were the Committee to resolve to grant a further planning permission, conditions and the S106 agreement would need to be carefully worded to reflect the part-retrospective nature of the current proposal, which would in effect subsume and enlarge upon the building currently under construction.

- **Community Infrastructure Levy (CIL)**

2.3 The development would be liable for CIL due to the amount of new floorspace proposed.

2.4 The Council’s CIL charging schedule sets a base rate of £120 per square metre for residential floorspace, including student accommodation. The rate is index linked and the current rate for 2019 is £148.24 per square metre.

2.5 The new floorspace proposed is 30,278 sqm.

2.6 Floorspace demolished under 162166 was 1928.52 sqm. The CIL Regulations regarding abatement allow for this to be taken into account, subject to certain requirements.

2.7 The estimated basic CIL charge would therefore be £4,202,526.92 [four million two hundred and two thousand five hundred and twenty six pounds and ninety two pence].

2.8 **This gives an indication of the likely CIL outcomes but is provided without prejudice to further examination of the CIL application by the Council.**

3. RELEVANT PLANNING HISTORY

3.1 Relevant planning history since 2014 is as follows:

140700	Request for a pre-application scoping meeting	Two initial scoping meetings were held with the applicant in late 2013 and early 2014. Following the second scoping meeting, officers produced a note for the developer, advising of locations for views analysis to be undertaken. In the same note, concerns were raised for the inconsistency of the emerging proposal with adopted planning
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		policy and officer advice at that time was that a development of circa. 15 storeys would be more appropriate.
141815	Screening opinion request	Opinion provided 8 December 2014, advising that the development would not be subject to the Environmental Impact Assessment (EIA) Regulations.
150120	Full planning application	Demolition of all existing onsite buildings and structures, including remediation, 352 new homes in a mix of sizes in three new buildings up to 28 storeys in height, reception, concierge, library, clubroom, community rooms, business centre, residents' fitness centre, residents' storage and associated other ancillary community uses, Up to 523 sqm of commercial floorspace (Use Classes A1, A2, A3, B1 or D1) in 2 units, 308 cycle parking spaces, 118 car parking spaces including four car-club spaces and private residents' storage, access and service access, outdoor amenity space and landscaping. REFUSED 22 May 2015 for 12 reasons
160012	Demolition prior approval	Application for prior notification of proposed demolition (of car showroom). PRIOR APPROVAL NOT REQUIRED 15 April 2016
160236	Full planning application	Part retrospective change of use to public car park for temporary three year period. PLANNING PERMISSION GRANTED 24 May 2016 Temporary permission until 24 May 2019. Implemented
162166	Full planning application	Erection of a part 12 storey, part 23 storey building comprising 315 apartments in a mix of studio, one-bedroom, two-bedroom and 3-bedroom units; residents' lounges, tech-hub, dining room, and cinema room, various rooftop outdoor amenity spaces, concierge/reception with coffee meeting area, residents' storage facilities, postroom, ancillary back-of-house facilities, 315 secure cycle parking spaces, 49 car parking spaces, landscaping, and associated works. Demolition of existing multi-storey car park. PLANNING PERMISSION GRANTED WITH s106 AGREEMENT (23/11/17)
181438/APC 181537/NMA 181858/APC 180329/NMA 180423/APC		Various applications for non-material amendments and approval of details reserved by condition, pursuant to 162166. Currently under consideration.

- 3.2 Following the refusal of planning application 150120 and up until October 2016, the applicant entered into an extensive period of pre-application negotiation with officers, centred on attempting to achieve officer support for a development mass/building envelope. This culminated in approval of application 162166.
- 3.3 It should be noted that no pre-application discussions took place between the approval of 162166 and the submission of the current application.

4. CONSULTATIONS

(i) Statutory:

- 4.1 **Environment Agency:** As with 162166, no objections, subject to conditions and informatives being applied, which principally relate to contaminated land. [*Officer comment: relevant contaminated land conditions have already been discharged in implementing permission 162166.*]

(ii) Non-statutory:

RBC Transport Strategy

- 4.2 The site was granted full planning permission under reference 162166 in November 2017 for a managed 315-apartment build-to-rent development. The proposed alteration to the consented scheme will increase the number of build to rent apartments by 23 units equating to 338 units in total. Car parking provision will remain the same as the consented scheme, at 49 spaces, while cycle parking will be increased to 338 spaces. Other than the increase in unit numbers, the proposed development is identical to the previous consented scheme.

Access

- 4.3 Vehicular access to the site is to be retained via the existing access road from Kings Meadow Road. This road previously served the former Cooper BMW garage site and continues to serve the adjacent Napier Court Business units. Refuse and servicing areas are provided within the ground floor design. Swept path analysis has been undertaken using to demonstrate that service vehicles can access these areas and adequately manoeuvre in order to exit the site in forward gear.
- 4.4 The Council's Waste Operations department assessed the bin storage provision as part of the consented scheme. Refuse collection will be managed from the loading bay on the ground floor of the building with the management company presenting bins to the collection point. As per the consented scheme, the full management details should be combined into a waste management plan secured by condition. This will ensure the future occupiers/management of the site are party to what is in the waste management plan so that they comply with the agreed processes.
- 4.5 However, the additional 23 apartments will generate a requirement for 5 additional 4-wheeled recycling bins and 5 additional general waste bins. The applicant should confirm that they have increased the recycling and general waste

bins within the site to accommodate the additional units. *[Officer comment: This could be dealt with by way of condition].*

- 4.6 A secondary access point is proposed on the northern facade of the building to provide secure, direct access to the secure cycle parking area from Kings Meadow Road.
- 4.7 Pedestrian access is to be located on the western facade of the building fronting onto the existing footways on the A329.

Parking

- 4.8 The site is located on the boundary of Zone 1 and Zone 2 of the parking SPD and given the close proximity to the Town Centre and Railway Station the requirements of Zone 1 have been used. The required parking provision is 0.5 spaces per unit equating to 169 parking spaces and a provision of 49 spaces at 0.14 spaces per unit has been provided. A lower provision is acceptable if the site is within a sustainable location and providing a lower provision of parking will not lead to Highway Safety Issues.
- 4.9 Kings Meadow Road and the surrounding road network all have parking restrictions preventing on-street parking, therefore, any overflow in parking would not affect follow of traffic on the classified road network. Kings Meadow Road does not fall within a Resident's Permit Zone and the residents will not be eligible to apply for a Residents Parking Permit.
- 4.10 Given the location of public car parks in the vicinity and parking restrictions on the adjacent roads, it is considered that the reduction in the residential provision on site will not lead to on street parking being detrimental to road safety and is acceptable.
- 4.11 The consented scheme secured the provision for 4 car club spaces with 3 vehicles initially, expandable to 4 vehicles subject to demand which formed part of the proposed Travel Plan measures. However, Transport DC cannot see the Framework Residential Travel Plan submitted with the application documents. The applicant is requested to submit the Framework Residential Travel Plan and indicate where the car club spaces will be located on the submitted floor plans.
- 4.12 The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. Policy TR5 of the emerging Local Plan also states that "*Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*"
- 4.13 In view of this, the development must provide at least 5no. Electric Vehicle (EV) charging point to promote the use of renewable electric vehicles at time of build. These spaces should be identified on the submitted floor plans. *[Officer comment: This can be dealt with by condition].*

- 4.14 Parking is to be provided on site within the Podium structure. The car park and ramp design complies with recommended design guidance for underground car parks. However, a minimum of 3 disabled spaces must be provided within the site. These spaces should be identified on the submitted floor plans. *[Officer comment: This can be dealt with by condition].*
- 4.15 The development proposes 338 secure cycle parking spaces which exceeds the Council's standards of 0.5 spaces per 1/2 bedroom flat and 1 space per 3 bedroom flat. The main cycle store is accessed from Kings Meadow Road on the northern facade of the building via a levelled access.

Landscaping and roadworks required

- 4.16 The amended scheme will continue to facilitate the provision of the Mass Rapid Transport improvements across the front of the site. Given that the East Reading MRT scheme will not be progressed at the current time, the applicants have also submitted plans without MRT which are currently being reviewed.
- 4.17 The development will fund a new signalised pedestrian/cycle crossing on Kings Meadow Road. The area of land on the southern side of Kings Meadow Road will be transferred to the Council to ensure that any infrastructure associated with the proposed signal crossing is located Public Highway land.
- 4.18 Pedestrian & cyclist access rights will be secured via a s35 agreement along the northern and western façade of the building to ensure there is a continuous footway link from Vastern Road to Napier Road.
- 4.19 The landscaping proposals will require a s142 licence which permits the occupier or the owner of any premises adjoining the highway to plant and maintain, or to retain and maintain, trees, shrubs, plants or grass on the highway.

Traffic Generation

- 4.20 The proposed development will result in 23 additional units compared to the consented 315 unit scheme but there is no increase in parking provision. To assess the impact of the additional units, the TRICS trip generation used for the consented scheme has been updated to account for the additional units.
- 4.21 The proposed additional 23 units will result in 3 additional two way trips in the AM Peak and 2 additional two way trips in the PM peak. This is a negligible increase in trips compared to the consented scheme and would have no material impact the local highway network.

Travel Plan

- 4.22 In order to mitigate the impact of the development, a Residential Travel Plan will be implemented as part of the development. Travel Plans are used to initiate modal shift away from the private car and towards more sustainable modes. As stated above, the Framework Residential Travel Plan submitted with the application documents. The applicant is requested to submit the Framework

Residential Travel Plan for further review. *[Officer comment - this could be achieved via a s106 agreement]*

Lead Flood Authority (RBC Highways)

- 4.23 Confirms that the SuDS proposals are acceptable subject to conditions to secure the implementation and future maintenance and management of the SuDS scheme in accordance with a timetable to be submitted.

RBC Environmental Protection (EP):

- 4.24 Comments on this proposal are the same as for the previous consented scheme and subsequent applications to discharge conditions.

Most of the details submitted pursuant to conditions attached to 162166 are acceptable and have been submitted again in support of the current proposal.

- A noise mitigation scheme for the flats
 - A noise assessment is required from plant
 - Air quality to the development is considered to be acceptable
 - Contaminated and land gas remediation
 - Construction-related controls (noise/dust).
- 4.25 The only outstanding query relates to noise ingress through ventilation air intake vents in the façade and whether the vents will be acoustically treated. This is currently being discussed with the applicant and is capable of being dealt with by condition, as with 162166.

RBC Valuers

- 4.26 Have assisted officers in examining the submitted viability assessment and affordable housing offer. Findings are summarised below in the Affordable Housing assessment in the main body of the report.

RBC Leisure

- 4.27 No objection to this application but request additional funding for off-site leisure provision given the increase in the number of residential units by 23. £120,000 is currently secured as a s106 leisure contribution towards improvements at Kings Meadow which, with 315 approved residual dwellings, equates to £380 per unit. This is the smallest S106 leisure contribution ever paid by a developer for such a high volume of residential units. If permission is granted for this latest application (338 units), this would equate to £355 per dwelling. It is unquestionable that the new residents will make use of the parks within the immediate vicinity of the development and additional funding is required.

RBC Planning (Natural Environment) (Tree Officer)

- 4.28 Fundamentally the proposal is acceptable as the changes do not affect landscape provision. However, the following comments/queries remain, some of which were raised for 180406/APPCON to discharge the landscape condition attached to 162166 (and currently remain unanswered).
- 4.29 Landscape General Arrangement Ground Floor 151638-STL-XX-00-DR-L-ZZZZ-09000 PL03 indicates grass (a 'meadow mix') planting over the whole frontage alongside the road. This is contrary to that approved under 162166, which included shrub planting. I note shrub planting is indicated on the Floor Plan - Ground floor and Soft Landscape Works Plan Ground Floor 151638-STL-XX-00-DR-L-ZZZZ-09140 PL04.

The GA plan should be consistent with the detailed plans. *[Officer comment: a revised scheme has been discussed and is currently awaited].*

- 4.30 In relation to the tree planting on the western boundary, the two *Carpinus* (Hornbeam) have been provided with 7.2m³ and 6.4m³ each of soil volumes. The Liquidambar have a soil volume of 8m³ for one tree and 12m³ shared for two trees. This is far from ideal as each should ideally be provided with a volume of approx. 12m³. It is assumed that the applicant has explored all options for increasing soil volume and this is the maximum that can be achieved - confirmation is required. *[Officer comment: this has been discussed with the applicant and an improved soil volume has been requested. Details are awaited.]*
- 4.31 There are outstanding questions over ground levels on the frontage [reconciling the difference in level between ground floor of the building and Kings Meadow Road] Any retaining structures should be clearly shown on these plans. [A revised proposal is awaited].
- 4.32 With reference to Landscape General Arrangement Floor 3 151638-STL-XX-03-DR-L-ZZZZ-09001 P01 and Soft Landscape Works Plan Floor 3 151638-STL-XX-03-DR-L-ZZZZ-09141 P01, the planting principles are fine but no planters specification are provided nor are there specifications for the green screen - this is required. [awaited]
- 4.33 Details on Landscape General Arrangement Floor 11 151638-STL-XX-11-DR-L-ZZZZ-09003 P01 and Soft Landscape Works Plan Floor 11 151638-STL-XX-11-DR-L-ZZZZ-09143 P01 are acceptable.
- 4.34 With reference to Landscape General Arrangement Floor 12 151638-STL-XX-12-DR-L-ZZZZ-09004 and Soft Landscape Works Plan Floor 12 151638-STL-XX-12-DR-L-ZZZZ-09144 P01 - planting is fine but again planter specifications are required. [awaited]
- 4.35 Details on Landscape General Arrangement Floor 22 151638-STL-XX-22-DR-L-ZZZZ-09005 P01 and Soft Landscape Works Plan Floor 22 151638-STL-XX-22-DR-L-ZZZZ-09145 P01 are acceptable.
- 4.36 Tree within planter 151638-STL-XX-XX-DR-L-ZZZZ-09401 P01 details are acceptable. It is not clear whether these details are applicable to the planters without trees too. [Confirmation awaited].
- 4.37 Site Sections drawing 151638-STL-XX-XX-DR-L-ZZZZ-09300 P01 does not make it clear, from sections 1 & 2 how the tree planting ('buffer planting') on the east side will be accommodated. This should be clarified. [awaited].
- 4.38 It is noted that the Service Entry Zone drawing now shows services long the frontage, whereas previous service routes were only shown on the west side. This has resulted in the route of water being through the soft landscape bed in which the individual *Quercus Robur* is proposed. There also appears to be a foul drain proposed in the location of the 4 trees on the frontage. Tree pit/planting opportunities are already limited by existing services, this should not be constrained further by new services. Comment is required on the feasibility of this - it is important to understand the full constraints to the rooting environment of these trees. [Discussed and details awaited].

4.39 In relation to the Typical Tree Pit in Soft landscape area drawing, it is noted that the inclusion of a root barrier '*Where required 1000mm deep root barrier to be installed against edge of tree pit along the line of underground services, roads and footways*'. In addition to the new services shown on the Service Entry Zones drawing, it would be helpful and necessary to plot the existing utilities on the soft landscape drawing in order for the position of root barriers to be established. It is also noted that root barrier locations are shown for the western trees on the Soft Landscape Works plan for the Ground Floor but not for those on the frontage/north side. [awaited].

4.40 151638-STL-XX-XX-SP-L-4080-SP001- Outline Soft Landscape Specification P01 specifies that trees shall be planted in a pit excavated 1200mm deep and that the depth of soil will be 900mm plus 300 drainage layer. This depth is indicated on the Typical tree pit detail but it would be helpful to receive specific confirmation that this can be achieved for all trees. The specification also refers to semi-mature trees surrounding by hard landscaping - It is not clear which this refers to. [Requested. Details awaited].

RBC Ecologist

4.41 No objections, subject to a condition for wildlife mitigation and for the Tree and landscaping detail to include biodiversity enhancements [Discussions as to the design and location of a rooftop Peregrine Falcon nesting platform are ongoing]

RBC Sustainability Team

4.42 Has reviewed the energy and sustainability strategies produced and concur with the approach taken by the applicant.

Berkshire Archaeology:

4.43 The applicant has submitted with this application a 'Project specification for an archaeological evaluation' prepared by Thames Valley Archaeological Services (TVAS) and dated 3rd January 2018 (revised). The document was prepared for and cites application 162166 rather than the current application.

I am aware that the programme of archaeological work set out in TVAS's specification has since been undertaken and Berkshire Archaeology is in receipt of two reports from TVAS on the results of the exercise. The results make it clear that the programme of archaeological work has been completed satisfactorily.

On this basis, there are no further concerns as regards the buried archaeological heritage in relation to this application (182196).

Historic England

4.44 The application should be assessed against National and local policy guidance and on the basis of Reading's own specialist conservation advice.

RBC Emergency Planning Manager

4.45 No response received. Comment on 162166 was that risk of the building itself being a target for terrorist attack is low, but proximity to bomb blast of the Station is a risk. Suggests laminated glass for areas facing the station. [*This could be a condition of any approval, as previously*].

Civil Aviation Authority

4.46 No response

Wokingham Borough Council
4.47 No response

South Oxfordshire District Council
4.48 No response

Reading Civic Society
4.49 No response

Crime Prevention Design Advisor (Thames Valley Police):
4.50 No response received. Comment on 162166 was that has a number of concerns with this complicated development, but advises that a comprehensive security strategy (secured by condition) could overcome this.

Network Rail
4.51 Has responded to the application in a similar way to previously. The majority of the concerns raised relate to the safe functioning of the railway and are largely a matter to be resolved between the respective landowners. The applicant is aware of these points, which could form an Informative on any permission.

Crossrail
4.52 No response

Caversham GLOBE
4.53 No response

Reading UK CIC
4.54 No response

RBC Waste Manager:
4.55 No objection received (also none previously on 162166)

Thames Water
4.56 Suggests informatives, but also (consistent with 162166) requests that conditions be attached to any planning permission to secure upgrades to foul sewerage infrastructure and drinking water supply; and to control foundation piling works close to water infrastructure.

Public consultation

4.57 Site notices were displayed on Kings Meadow Road and Napier Road frontages to the site.

4.58 Letters were also sent to the following addresses:
All properties in Napier Court
All properties in Kingfisher Place
All previous objectors.

4.59 20 letters of objection and one comment have been received, raising the following issues:

- The recent application for an additional storey to the development has failed to properly notify all residents at Kingfisher Place.

- Ongoing concerns about the loss of light/overshadowing on our living environment and property value [Kingfisher Place]. The additional proposed storey is expected to have a further detrimental impact in this regard.
[Officer comment. Letters were sent to all addresses in Kingfisher Place. Site notices were readily visible when entering and leaving Kingfisher Place]
- Out of proportion and too high for the surrounding area.
- How will RBC enforce that affordable part gets built and let appropriately?
- There is a plan for office space as well - The Arc? Don't trust what is really going on here.
- I am against this building application because i believe that it will add a massive burden to the community's infrastructure.
- But, this application is only adding an extra 13 storey part to the original application and what I object to specifically here is that there is no SOCIAL housing included in this project. Therefore this will become a ghetto of up-market flats and not an intergrated community. SOCIAL housing must be included.
- 12 floors were passed by the council in 2017 somewhat to our dismay but we could not object further having already won the reduction in floor levels from 26 to 12 on this element of the building. I strongly object now to a further floor to the 12 agreed. floors are determined above the service levels which actually are the equivalent height of three floors. therefore finished height total will equal 16 floors if this futher application is agreed completely blocking the short amount of sunlight we experience on the south facing aspect of our buildings. getting access to our exit road will also be impacted in a major way given other plans for flats further up our access road. The few more apartments that a 13th floor will provide is for the owners of the Thames 1/4 is disproportionate to the loss of value to our 38 apartments at Kingfisher Place.
- Outwith the growth in height of developments and the associated increase in population density that has occurred in Reading over the last decade without significant infrastructure improvements it is bordering on negligence to allow this development to be built with only 49 car parking spaces. As recently as 2012 the Mayor of London commissioned a survey with the following findings:- Car ownership levels Inner London: Almost half of the households in Inner London new developments do not have access to a car while 43 per cent have one car, 8 per cent have two cars and just 2 per cent have access to three or more cars. Outer London The majority of households, 52 per cent, living in Outer London new developments have one car while a further 18 per cent have two cars. Only a small minority, 3 per cent, have access to three or more cars. The proportion of households without a car is 27 per cent. Only 17% of purpose built flats in outer London were provided with less than 0.5 parking spaces per apartment, with 73% of residents owning a car. Based on the various elements of the noted study it would be a marketing error to assume that most potential typical residents would want to live in this development considering the limited onsite parking and scarce availability of on road parking
- Plans show tower will stick out like a sore thumb from several local viewpoints. Makes biscuit tin look small! Will block out lots of light in already quite dark area. Strongly object to location and usage of tower. Large number of vehicles will be attracted to area both in development and final usage. Vastern / Napier rd roundabout is well known traffic hotspot and tricky for cyclists and pedestrians to navigate safely. More people living right on the roundabout will create significantly more traffic: leads to worsening air pollution and increased risk of cyclist and pedestrian deaths both short and long term. Report often uses line: "the proposed intervention will make an imperceivable impact upon.."; when there would definitely be a significant negative impact for us locals. Developers have either not carried out assessments properly or don't really understand / care about the

hugely negative impact such a ginormous monstrosity will have. Building unlikely to bring any additional jobs locally and will create extra demand for already scarce resources. I VERY strongly object against the proposed plans.

- This sounds awful. A 23 storey building will tower over everything else and stick out like a sore thumb. The traffic around the roundabout is already very busy at peak times - another 338 apartments will just make things even worse. And where will all the residents park?
- Object. Too high for the area and would cause more vehicle in Reading which is already too congested there are way too many tower blocks in Reading. More and more flats are being built but no extra schools are being built, doctors surgeries or hospital places are even considered. Reading is already grid locked with traffic and this development will only add to this on an already very very busy roundabout. To also have a tower block this high so close to the river will only ruin the views even more. I object to this and feel it has been kept very hush hush as to what is being built there. I am a very angry resident who has lived in Reading all my life.
- Strongly object to this project at this size. A smaller building at the height of the others in the immediate area would most likely be fine both asthetically and in terms of impact. 338 apartments is a huge number to add to a part of reading already struggling with traffic, public services, pollution etc... please do not let this go ahead as planned.
- I object strongly to further accommodation and high rise building in this area , the roads are already extremely busy and the infrastructure such as schools , GP surgeries are already struggling
- I am objecting to the height of the building, 23 storey and 13 storeys will be totally wrong for this site. A total of 338 apartments is just too much. The roundabout is currently having severe problems with many accidents, lack of cycle lanes, air quality. Traffic from this development will obviously add to the current problems. What about the infrastructure, where are all these people supposed to go to a dentist, doctor or hospital? The whole town is straining under overdevelopment - no provisions put in place for services and the horrendous traffic problems in Reading. It's just a goldmine for developers who have no consideration for the structure of the town. Just down the road on the old Homebase site another huge development approved by Reading Borough Council. I know we need housing, but really a total overdevelopment of this side of town.
- 13 storeys is much too high in this position. Reading needs more accommodation, but preferably affordable flats for people without cars who can use the facilities that already exist, rather than more posh accommodation for commuters to the capital.
- This is a terrible suggestion: far too many flats are proposed, the proposed building is far too tall, the impact on traffic in an already congested area will be fatal, especially given the poorly planned roundabout directly in front of the site which is already the site of numerous accidents. Also no indication that any consideration into supporting infrastructure has been made. A really terrible idea to build such an enormous block of flats here.
- Regarding traffic, the plan has relied heavily on the MRT development (as part of the Local Transport Plan) to reduce parking/traffic in the area. However, RBC has now withdrawn the planning application for the MRT. In the proposal it has been stated that MRT was crucial to keep traffic and parking in the area under control. It is not clear how the applicant is going to respond to these important changes in the RBC LTP. Therefore, there is a serious risk that traffic/parking (already particularly congested at the moment) is going to deteriorate even further, with serious risk of collapse for the wider area of Caversham/Napier road/etc. Regarding services (like schools, doctors, etc), it has been very difficult (for a non

expert like me) to identify how the applicant is addressing these aspects. There is the impression that these aspects have not been discussed in depth.

- I have 2 objections (1) the size/height of the buildings is too large in comparison to other buildings in the area and therefore intrusive, (2) traffic congestion is already bad in that area, particularly over Reading Bridge in rush hour, and having 338 more households right at this junction can only make this worse.

1- the flood plain issue. At the time when EA is working on defence flood walls plans, it seems absurd to add on buildings, so close to the river. Despite what the application says, all extra weight on ground is going to have an impact. I think RBC should be strict on this issue and refuse all new constructions.

2- the height is wrong for a central position. Too many flats, too many cars (parking space being very limited), congestion of roads will be increased (at a time when RBC is trying to reduce the number of cars in the town!), access roads are already full at peak hours, the new 700 houses on the Homebase site are also going to add to the traffic problems.

3- where are all the new residents going to send their children to school? Where will the new surgeries be? Reading surgeries are already over full. What about the Hospital already unable to deal with the present patients, without imposing long waiting lists and delays?

This is why I think that the application should be refused: it's a clear case of speculative use of the land. The developers have been working hard from the start to put as many flats as possible, to provide LUXURY accommodation and create extra pressure on the infrastructures which will be detrimental to the environment and the everyday lives of the local residents. Building these high rise towers outside the centre would be more acceptable but not in the centre of Reading.

- I object to further apartments on this site and increasing the height of the building. The tower is far too high for the area and I feel the view from Caversham has not been sufficiently considered, and hope that the height of the buildings are not increased in any way. The impact on waste water surely increases with increased apartment numbers. I believe the council has recognised an increase in potential flooding to Lower Caversham and am concerned the increase will have an impact.
- Strongly object to this revision to the previously consented planning permission 162166. The previous scheme was better balanced, in terms of appearance and scale.
- This will be far too tall, ruining the skyline of Reading and setting a precedent for future developments which would further ruin the skyline. The cladding on the tower will not fit in with the surrounding area and will be an eyesore. The adjacent roundabout is already gridlocked during rush hour and this development would only make matters worse. Also where will everyone park? It will block up all the surrounding car parks stopping people from visiting Reading. Money should be taken from developers to enhance Readings cultural heritage, not build awful tower blocks adding to the faceless 'you could be anywhere' look we seem to be going for in Reading.
- Planning permission has already been granted; work has commenced on the site. I see no reason why this application should be granted. They are being greedy asking for another storey from 12 to 13. The crane that's there can be seen for miles which means the 23 storey agreed will be an eyesore. The applicant really should get up to date - how can the development; facilitate the mass transit scheme; as it's been thrown out. Please reject this blatant scheme which is only driven by money.

5. RELEVANT POLICY AND GUIDANCE

- 5.1 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 5.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 In terms of impact of development on the setting of a scheduled monument, securing the preservation of the monument 'within an appropriate setting' as required by national policy is solely a matter for the planning system. Whether any particular development within the setting of a scheduled monument will have an adverse impact on its significance is a matter of professional judgement. It will depend upon such variables as the nature, extent and design of the development proposed, the characteristics of the monument in question, its relationship to other monuments in the vicinity, its current landscape setting and its contribution to our understanding and appreciation of the monument.
- 5.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 5.5 National Planning Policy Framework (NPPF) (2019)
- The following NPPF 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
 - 11. Making effective use of land
 - 12. Achieving well-designed places
 - 16. Conserving and enhancing the historic environment.
- 5.6 Other Government Guidance which is a material consideration
Historic England Advice Note 4: Tall Buildings (2015)
DCLG: Accelerating Housing Supply and Increasing Tenant Choice in the Private Rented Sector: A Build to Rent Guide for Local Authorities (2015)
Government National Planning Practice Guidance (NPPG) suite (including specific chapter on Build to Rent (13 September 2018)
- 5.7 Reading Borough Local Development Framework: Core Strategy (January 2008) (as amended 2015)
CS1 (Sustainable Construction and Design)
CS2 (Waste Minimisation)
CS3 (Social Inclusion and Diversity)
CS4 (Accessibility and the Intensity of Development)

CS5 (Inclusive Access)
 CS7 (Design and the Public Realm)
 CS8 (Waterspaces)
 CS9 (Infrastructure, Services, Resources and Amenities)
 CS10 (Location of Employment Development)
 CS11 (Use of Land for Alternative Uses)
 CS15 (Location, Accessibility, Density and Housing Mix)
 CS16 (Affordable Housing) including update to policy, 2015
 CS20 (Implementation of The Reading Transport Strategy (Local Transport Plan 2006-2011))
 CS21 (Major Transport Projects)
 CS22 (Transport Assessments)
 CS23 (Sustainable Travel and Travel Plans)
 CS24 (Car/Cycle Parking)
 CS25 (Scale and Location of Retail, Leisure and Culture Development)
 CS26 (Network and Hierarchy of Centres)
 CS29 (Provision of Open Space)
 CS33 (Protection and Enhancement of the Historic Environment)
 CS34 (Pollution and Water Resources)
 CS35 (Flooding)
 CS36 (Biodiversity and Geology)
 CS37 (Major Landscape Features and Strategic Open Space)
 CS38 (Trees, Hedges and Woodlands)

5.8 Reading Borough Local Development Framework: Reading Central Area Action Plan (RCAAP) (2009)

RC1 (Development in the Station/River Major Opportunity Area). The site is identified in the RCAAP as site RC1h Napier Road Junction
 RC5 (Design in the Centre)
 RC6 (Definition of the Centre)
 RC9 (Living in the Centre)
 RC10 (Active Frontages)
 RC13 (Tall Buildings) (the site is at the eastern extremity of the RC13a Station Area Cluster)
 RC14 (Public Realm)

5.9 Reading Borough Local Development Framework: Sites and Detailed Policies Document (2012) (as amended 2015)

SD1 (Presumption in Favour of Sustainable Development)
 DM1 (Adaptation to Climate Change)
 DM2 (Decentralised Energy)
 DM3 (Infrastructure Planning)
 DM4 (Safeguarding Amenity)
 DM10 (Private and Communal Outdoor Space)
 DM12 (Access, Traffic and Highway-Related Matters)
 DM18 (Tree Planting)
 DM19 (Air Quality)

5.10 Reading Borough Submission Draft Local Plan 2018

The examination process included a set of public hearings. These hearings took place between 25th September and 5th October at the Town Hall, Blagrove Street. The Inspector has provided a Post Hearing Advice Note in respect of a number of issues arising during the examination which is available to view at <http://www.reading.gov.uk/localplanexamination> (document ref EI 014).

CC1: Presumption in Favour of Sustainable Development
 CC2: Sustainable Design And Construction
 CC3: Adaptation To Climate Change
 CC4: Decentralised Energy
 CC5: Waste Minimisation And Storage
 CC6: Accessibility And The Intensity Of Development
 CC7: Design And The Public Realm
 CC8: Safeguarding Amenity
 CC9: Securing Infrastructure
 EN1: Protection And Enhancement Of The Historic Environment
 EN2: Areas Of Archaeological Significance
 EN3: Enhancement Of Conservation Areas
 EN5: Protection Of Significant Views With Heritage Interest
 EN6: New Development In A Historic Context
 EN7: Local Green Space And Public Open Space
 EN9: Provision Of Open Space
 EN10: Access To Open Space
 EN12: Biodiversity And The Green Network
 EN13: Major Landscape Features And Areas Of Outstanding Natural Beauty
 EN14: Trees, Hedges And Woodland
 EN15: Air Quality
 EN16: Pollution And Water Resources
 EN17: Noise Generating Equipment
 EN18: Flooding And Drainage
 EM1: Provision Of Employment
 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
 TR2: Major Transport Projects
 TR3: Access, Traffic And Highway-Related Matters
 TR4: Cycle Routes And Facilities
 TR5: Car And Cycle Parking And Electric Vehicle Charging
 CR1: Definition Of Central Reading
 CR2: Design In Central Reading
 CR3: Public Realm In Central Reading
 CR6: Living In Central Reading
 CR10: Tall Buildings
 CR11: Station/River Major Opportunity Area

- 5.11 Supplementary Planning Documents
 Reading Station Area Framework (RSAF) (2010)
 Sustainable Design and Construction (July 2011)
 Parking Standards and Design (October 2011)
 Employment, Skills and Training (April 2013)
 Affordable Housing (July 2013)
 Planning Obligations under S.106 (April 2015)

5.12 Other Reading Borough Council corporate documents

Tall Buildings Strategy 2008
Tall Buildings Strategy Update Note 2018
Reading Open Space Strategy (2007)
Reading Tree Strategy 2010
Local Transport Plan 3: Strategy 2011-2026 (2011)

6. APPRAISAL

6.1 The extant permission 162166, currently under construction has many similarities with the current proposal. This is a material consideration in the determination of this application and the main issues raised by this current planning application are therefore focussed on :

- (i) Principle of Development
- (ii) Height and Massing in Context
- (iii) Affordable Housing and Housing Need

(i) Principle of Development

- ***Tall Buildings Policy***

6.2 The principal difference in design terms between the current application and permission 162166 is the addition of a further storey of development to the lower building to take it from a consented 12 residential storeys to the proposed 13 storeys. The first matter to consider is therefore the policy basis for assessing such a difference in height and to discuss whether this is materially significant.

6.3 Tall buildings policy proposals for the Station Cluster (which includes the application site), originated in the Tall Buildings Strategy (2008) and are identified in the Reading Central Area Action Plan (particularly Policies RC1 and RC13) and are supplemented with much more detailed guidance in the Reading Station Area Framework (RSAF), adopted in 2010. The RSAF looked at a number of matters critical to the approach to tall buildings in the area, such as height, scale and massing and key views. It identifies sites suitable for 'district and local landmarks', and provides clarity to the approach that a cluster of tall buildings is proposed, generally forming a 'dome' pattern with the highest buildings on the sites closest to the station.

6.4 The Applicant asserts that the RCAAP, Core Strategy and RSAF are out of date. Officers disagree and refer to the recent Tall Buildings Strategy Update 2018 which was submitted in evidence to the recent Local Plan examination alongside the 2008 Tall Buildings Strategy. It is worth highlighting paragraph 2.11 of the TBS Update which confirms that, "*The Local Plan proposes that the Station Area Framework will continue to apply*" and paragraph 7.2 which states, "*it is considered that the overall evidence and approach that was set out by the TBS and resulting RCAAP policy is still generally valid. As a result, the TBS, accompanied by this note, remains a valid piece of evidence for policy making in 2018, and it should continue to underpin the policy approach of the Local Plan.*"

6.5 It is also relevant to note that the NPPF expressly supports the Council's approach in setting a clear design vision and expectations as per the RSAF as underpinned by

relevant Development Plan policies. Para. 125 states *“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development”*.

- 6.6 Para 126 continues: *“To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”*
- 6.7 In terms of local policy, the **RCAAP RC1(h)** designation envisages a dense, large scale development and this is carried forward in the Submission Draft Local Plan 2018, which shows an indicative development potential for this site of 200-300 dwellings, plus some commercial (draft Policy CR11h). It is relevant to note, for context, that Napier Court to the east is also identified in the draft plan for higher density redevelopment, (not Tall Buildings). Therefore, the removal of the present building and the redevelopment of the site more intensively is acceptable in principle, which was also acknowledged when determining the extant permission 162166.
- 6.8 The **RBC Tall Buildings Strategy (2008)** (a background paper to the RCAAP), and the 2018 Update Note (both background papers to the emerging Local Plan) identify a cluster of tall buildings around the station where the tallest buildings are intended to command the dominant position in the cluster for the Reading skyline. The eastern and western tall building zones identify point markers, such as The Blade and Kings Point (now ‘Verto’) in the east and Fountain House and Chatham Place in the west. In this way, the skyline of the town is balanced and the appropriate scale or build-up of scale can be attributed to the locations of the greatest importance and sustainability. This is related to the policy aim of increasing densities for the Central Area, as set out in the RCAAP.
- 6.9 In the **RSAF**, the aspirations for heights are set out in Chapter 6 entitled, Density, Mass and Height. The application site is earmarked for “Medium-High Density” (Figure 6.7) (as opposed to “Very High” for the more central sites in the tall building cluster around the Station) and suitable for a “Local Landmark” building (Figure 6.8) (as opposed to other sites which are identified as suitable for a more prominent “District Landmark”). Therefore the RSAF provides useful and specific advice on the required function of the landmark at this location. Figure 6.10 of the RSAF SPD provides the suggested relative heights in the Central Area (entitled “tall building location guidance”) and indicates that a lower overall height would be appropriate for this site, which is at the eastern extremity of the RSAF area. The RSAF clearly indicates that in height and density terms, this site is to be developed at a significantly smaller scale than the tallest buildings which would be sited immediately adjacent to the station.
- 6.10 As with the Committee report for 162166, it is worth noting the scale of other tall building proposals/permissions in the Central Area:

Site	Height (max.)	Comment/status
Plot C, 'Station Hill 3'	109-128m AOD	OUTLINE PLANNING PERMISSION, not commenced. (the height is a range due to the parameters set by the outline planning permission)
29-35 Station Road (adjacent to Station Hill)	121m AOD	Current application 181930
Thames Quarter	111.7 AOD	Permission granted under 162166.
80 Caversham Road 'Royal Mail site'	123.18m AOD	Current application 182252.
Thames Tower	103.3m AOD	PERMISSION, completed (with roof extension)
Chatham Place	102.5m AOD	PERMISSION, completed
Kings Point/Verto	94.1m AOD	PERMISSION, completed

- 6.11 Whilst exceptions may exist to the general rule that heights should reduce with distance from the station, these would need to be carefully controlled. Paragraph 6.26 of the RSAF states that: *“Landmark buildings may exceptionally ‘puncture’ the benchmark heights [8 storeys on this site, as set out in the RSAF, Figure 6.8] and the general ‘dome’ massing pattern in order to create emphasis and to mark important places. It is not envisaged that every potential landmark location in Figure 6.9 will necessarily provide a landmark building”*. The ‘landmark element of the current proposal is the same height as that approved under 162166 and is considered acceptable in this regard.
- 6.12 As concluded in the planning assessment of application 162166, the development opportunity of this site is considered to be for a single local landmark building which will need to show deference/subservience to the height of the buildings at the centre of the Station Area Cluster. It should nevertheless be capable of functioning as a gateway building, or in the words of the RSAF, a ‘local landmark’. This approach still has merit at this time as it did at the time of assessment of application 162166.
- 6.13 Both the permitted tower element and the permitted lower element of the development are ‘tall buildings’ in terms of the definition in **Policy RC13** (23 and 12 residential storeys). The sections below review the current application scheme in terms of the various requirements of the policy, where relevant.
- 6.14 It is considered that a tall building on this site would be unlikely to comply with the ‘normal’ criteria in **Policy CS7**, in terms of the effect on local character. In Reading, tall buildings are generally an exception to the prevailing character and represent a new direction for the townscape in character terms. Policy CS7 requires development to maintain and enhance the character of the area of Reading within which it is located. The criteria within the policy focus on *existing* grain, scale, layout and distinctiveness etc. The Committee report for extant permission 162166 clearly describes the more low-key character existing around the application site. Policy CS7 should therefore also be read in the context of other specific tall buildings policies which facilitate the step-change in scale; i.e. Policies RC1, RC13, the RSAF and emerging policy in the Draft Local Plan.

- 6.15 The contention of the Applicant is that there is no discernible difference between a 12 storey and a 13 storey lower block that that no significant adverse harm would be caused to the Benchmark Height of this area of Reading and therefore the skyline of the Reading Central Area. However, the Reading Station Area Framework sets clear guidelines for height and massing and states in paras 6.22-6.25:

“6.22 The benchmark height is the general recommended height for each area. The benchmark height is defined in commercial storeys, not metres and does not exceed ten storeys because this is the point at which tall building controls and design guidance applies. As a general rule, 10 commercial storeys equate to 12 residential storeys.

6.23 Benchmark heights may be modified upwards in order to realise certain urban design or other major planning benefits, or where applicants have demonstrated convincingly that the potential impact of higher buildings on the surroundings can be mitigated.

6.24 Benchmark heights are not guarantees and may be modified downwards where it becomes clear that proposed buildings will harm residential amenity or affect the setting of listed buildings, important views or open spaces.

6.25 There is a general presumption that benchmark heights should grade back to the established heights in the surrounding areas.”

- 6.16 The proposed ‘benchmark’ element of the proposed building (in fact the majority of the building footprint) would exceed the 10 commercial/12 domestic storey recommended height set by the RSAF and Policy RC13. The RSAF is clear that benchmarks are based on “storeys” rather than “metres”. It is also relevant to note that the RSAF suggests a benchmark height of 8 (commercial) storeys for this site (see fig. 6.9, p.37). The lower 8 storey site-specific height suggested for this site is consistent with the site’s peripheral location in terms of the Station Area Cluster (see fig 6.10 of the RSAF).
- 6.17 Officers consider that it is apparent that the now-proposed 13 storey lower element exceeds these criteria and does not comply with the guidance in the RSAF. It is acknowledged that the extant permission for a 12 storey (10 commercial equivalent) block also exceeds the 8 storey guide. However, the proposed creep upwards to exceed both the general 10/12 storey guide and the 8 (commercial) storeys site specific guide is an indicator of harm in basic policy terms.
- 6.18 It is acknowledged that a slavish adherence to policy is not always appropriate. Indeed the guidance in the RSAF notes that Benchmark heights may be modified to achieve certain urban design or other major planning benefits, or where applicants have demonstrated convincingly that the potential impact of higher buildings on the surroundings can be mitigated. But it is also considered appropriate to give significant weight to the fact that the tall buildings policies result from a body of background research and are intended to steer a new, ‘emerging character’ and one which has potential to substantially alter the character and appearance of the town. This necessitates a good degree of prescriptive guidance to ensure that the new character is of benefit to the town. The Tall Buildings Strategy (p.2) states that “*This strategy will inform the development of a tall buildings policy and of specific guidelines for individual sites and areas that will be documented within the Reading Central Area Action Plan. It will also operate as a useful tool for the Council in assessing proposals for taller buildings in the central area of Reading*

over the coming years.” Read together, the Development Plan and supplementary guidance in the Reading Station Area Framework (RSAF) provide an appropriate framework within which the question of appropriate intensity and scale can be evaluated.

- 6.19 In this instance, officers are not convinced that clear arguments have been provided by the applicant to demonstrate that no harm will be caused to the strategy for benchmark heights in this peripheral, edge of centre location. The unjustified elevation of the lower block would be, in your officers’ view, at odds with the carefully-presented adopted strategy to ensure that these important ‘benchmark’ structures do not start to loom in these locations, thereby blurring the distinction between tall buildings and the surrounding skyline.
- 6.20 It is considered that the height and mass of the proposed development would be harmful to character measured against the guidance set out in Development Plan policy and associated guidance and would fail to achieve the objectives and aspirations for tall buildings as set out in these. This harm (together with any “mitigation” will be considered further as part of the overall ‘Planning Balance’ below.

- ***Density and Efficient Use of Land***

- 6.21 The applicant considers that the Development Plan is out of date insofar as the NPPF 2019 puts increased emphasis on efficient use of land for housing.
- 6.22 The NPPF 2019 in para 118(c) ‘Planning policies and decisions’ states that LPAs, *“...should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”*
- 6.23 This is a new requirement within the 2019 Framework. However it is considered that this is consistent with existing Development Plan policy and local guidance which supports a high-density, tall building on this site, for instance Policies CS4, CS15, RC1 and RC13, as supported by the RSAF. The Development Plan is not considered to be inconsistent or out-of-date in this regard and remains the starting point for decision making as per s.38(6) of the Act and as confirmed by para 12 of the NPPF itself.
- 6.24 Para 123 of the NPPF refers to density. Officers advise that the extant permission currently under construction already exhibits a significant uplift on the average density of residential development in the area and could not reasonably be described as ‘failing to make efficient use of land’ as alleged by the applicant. 338 dwellings on a 0.5 hectare site results in 169 dwellings per hectare which is well in excess of the minimum density of 70 dwelling per hectare for town centre sites set by Policy CS15 and also the emerging Policy H2 which suggests a minimum of 100 dph in the centre. The RSAF refers to ‘plot ratios’ as a measure of density (floor area relative to plot size) which in the case of the current proposal would be 6:1 or 600%. Fig. 6.7 of the RSAF suggests a “medium-high” density for the application site (“medium” is defined as 200 to 500% or 2:1 to 5:1, with “high” being 500 to 1000% or 5:1 to 10:1). The proposed density is therefore firmly in the “high” rather than “medium” density range.

6.25 It would be illogical to suggest that the renewed emphasis on efficient use of land within national policy requires additional density in circumstances where higher than prevailing density is already encouraged and allowed for within adopted local policy in the Development Plan (as is the case here). Notwithstanding the fact that the Development Plan is not out of date in this regard, it is considered that the extant permission already complies with the 'substantial weight' in the NPPF given to increased densities and the current proposal to increase density further does not add any additional benefit in this planning assessment and should not be given weight in this planning assessment.

ii) **Height and Massing in Context**

• ***In Relation to Surrounding Townscape***

6.26 The Applicant contends that there would be no material harm to the street scene surrounding the site. In effect, he is arguing that because the Council has already approved a 12 storey building, an additional floor cannot really be significantly harmful.

6.27 Pre-application discussions prior to the submission of application 162166 focused largely on alternative options for bulk and massing on the site. The refused Swan Heights proposal (150120/FUL) was considered to be capable of harm to a range of views and settings in the Borough at all distances.

6.28 Both the extant (162166) scheme and the current application propose a (Local) Landmark tower at the western end of the site and as can be seen from the photograph at the beginning of this report, the lift core has now been constructed to the total height, in accordance with planning permission 162166. Although it remains the case that a Landmark does not necessarily mean a Tall Building (it could be distinctive due to other attributes other than height), there have been no changes in policy or the site context to suggest a different approach to the Landmark tower under the current application.

6.29 The officer assessment of the extant (162166) scheme said that: *"The applicant's DAS describes the design envelope in terms which echo the RSAF, in that there is a 'landmark building' (the tower) and a 'benchmark building' (the lower element). The North-West corner is identified as the location for the tower and given the location of the railway and the centre of the tall building cluster, this is considered to be the best location for the taller element of the scheme. The benchmark building is the lower building and its height has been primarily dictated by the prevailing heights of the surrounding built form, for instance the Forbury Place development. In proportion, the tower is roughly twice the height of the tower and in your officers' opinion - as has also been voiced in design reviews - anything less would appear proportionally to be too squat. Therefore, the design proposes a benchmark height 'city-block' building and this surrounds the tower. The architectural detail, discussed further below, seeks to distinguish the two distinct design elements. Officers are therefore content that the massing complies with the RC1h designation for the site as amplified by the RSAF, which require a single tall building."*

6.30 Policy RC1(vi) requires "Development in the Station/River Major Opportunity Area" to "Give careful consideration to the areas of transition to low and medium

density residential and protect and, where appropriate, enhance the setting of listed buildings;”

- 6.31 Para 6.13 of the RCAAP states that, “...schemes in these areas should take account of the fact that there are areas of low-rise housing fringing the area, and this should be reflected in the design of schemes, both in terms of the effect on character of the area and on the amenity of residents.”
- 6.32 The application suggests that the primary reference point for the benchmark site for the site should be recently constructed buildings on Forbury Road. It is noted that these are set on higher ground. Former Energis House (2 buildings) has 8 commercial storeys above street level (street level is broadly level with the top of the adjacent railway embankment). A key question is therefore how these buildings are *experienced* within the townscape relative to their surroundings, and not just in medium-distance views within the town. It is considered that that the proposed new building needs to respect local topography if it is to respond appropriately to its context. This is reflected in fig. 6.4 of the RSAF which refers to benchmarks being set as storey heights rather than metres. Para 6.15 of the RSAF also gives guidance on relating buildings to topography: “*The [Station] area marks a bluff or low hill with the ground rising from the Thames flood plain to the east, north and west. Building heights can mirror this topography. Conversely, lower buildings are to be encouraged on the lower ground.*” This approach avoids a hypothetical situation whereby buildings lower in the valley rise to the same height as those upslope, which would otherwise result in the valley bottom being occupied by disproportionately large and oppressive buildings.
- 6.33 With regard to Energis House and One Forbury Road, officers note the following:
- Energis House building (permission 121826/FUL) has an adjacent road level of 41.37m AOD and Forbury Road is almost 4 metres higher on the frontage with Energis House compared with Kings Meadow Road to the north of the railway.
 - One Forbury Rd (070930/FUL) has a ground floor level of 41.45m AOD (the Lower Ground basement level is 38.25m)
 - The proposed Thames Quarter building has a Ground floor level of 38.8m AOD with the adjacent road level of 37.6m AOD.
- 6.34 The relative height and massing of the proposed 13 storey element of the current application above adjacent *street* level would therefore be greater than that of buildings that rise to a broadly comparable height AOD (sea level) on Forbury Road.
- 6.35 It should also be remembered that the currently proposed 13 storey element of the scheme would be attached to the 23 storey tower element. The two are not separate in terms of their potential townscape impact. It is considered that the combined effect of the lower surrounding land levels and the overall scale of the building (lower element and tower element combined) would be a far more imposing building compared with Energis House, or One Forbury. The massing of the lower ‘benchmark’ wing of the building approved under 162166 (under construction) is already substantial compared with surrounding development. It would appear to be at the very limits of what can be justified in terms of townscape/character and was arrived at after lengthy negotiation relating to height and massing following the refusal of the wholly inappropriate ‘Swan Heights’ proposal. The proposal would fail to address the transition *to low and medium density residential and other domestic scale buildings* to the north of the site. There is also no apparent additional ‘mitigation’ within the new enlarged design to suggest a different approach, contrary to para 6.23 of the RSAF.

6.36 Put simply, the proposed height of the benchmark building is too tall in a valley location and is rising upwards to match the height of buildings located on higher ground. Combined with the substantial mass of the building this will result in an imposing and over-dominant building in the immediate street scene. Viewed from further away the building will intrude negatively within views and the excessive scale will be apparent.

- **Building Proportions**

6.37 As identified under 162166, overall and despite what appears as a “slightly overly-extended massing”, the form of the tall (Landmark) tower is considered to be elegant and any harm that may occur is considered to be comparatively limited. On balance, the scale, form and massing, when considered in the context of views and townscape was considered to be supportable under 162166, largely on the basis of the elegance of the tower.

6.38 It remains important that the tower ‘landmark’ element retains a strong vertical emphasis as a slender, vertical, elegant structure punctuating the skyline; discernible as purposefully distinct from a fundamentally subservient lower element sitting alongside. It is considered that the proposed upwards creep of the benchmark element in the current application would unbalance the proportions of the proposed building and would appear to exceed a tipping point visually, reducing the visual primacy and Landmark qualities of the tower by reducing the subservience of the Benchmark element and ‘suffocating’ the tower in visual terms and making it appear squat. This raises at least two key concerns. Firstly it harms the elegance and vertical emphasis of the tower identified previously by obscuring its lower storeys and secondly it results in the overall mass of the building as a whole becoming more apparent. The two elements would no longer sit side-by-side as distinct, separate elements and instead merge to form a monolithic mass. It is acknowledged by officers that this is a matter of quite fine detail, but it is considered to be critical. It is fundamentally important that the lower element should retain the relative subservience of the current approval and failure to do so would result in visual harm and an overly-dominant and bulky scale, built form, and appearance.

6.39 In terms of architectural *detail* the architectural treatment of the vertical tower and the lower ‘horizontal’ element were considered important in order to distinguish between the two distinct design elements. Officers at the present time have not approved the design details (brickwork and other façade detailing etc) which were highlighted as being an important component of the overall design in their role differentiating between the lower and tower elements. The details submitted pursuant to conditions attached to 162166 have not yet been approved and are still subject to assessment and negotiation.

- **Views**

6.40 As noted under the assessment of application 162166 and indicated above, the development would be evident in the majority of views identified as being affected. Having identified harm resulting from the proposed scale of building, it follows that this harm will be compounded due to the visibility of the building, particularly within mid and short-range views.

- ***Height and Massing Overall***

6.41 Based on the above assessment, it is considered that the proposed building is contrary to Policy RC13 in that the proposal does little to step down in height towards the adjacent lower buildings and would not enhance Reading's skyline due to an overly bulky profile and lack of care in the design of the middle section of the building. The proposal would not offer a 'human scale' to the street and would instead appear over-dominant and overbearing on persons experiencing the building at street level. As explained above, views of the overly-massive building would not be of the required high-quality from a range of distances and vantage points. It is considered that the building would fail to appropriately account for its context and would present a bulky over-dominant mass to the street. Policy RC13 also requires tall buildings to create safe, pleasant and attractive spaces around them and avoid detrimental impacts on the public realm. As explained above (see also daylight and microclimate sections below), it is considered that the scale of building proposed would fail in this regard.

6.42 It is considered that the significant increase in scale relative to that approved under 162166 results in a creeping decline in design quality as the new design starts with the approved design of building (which is already at the limits of acceptable scale) and simply inserts an additional floor, in effect 'jacking the building up' by a floor with no mitigation for the additional height and mass in evidence. On the basis of the above assessment, it is considered that the height and massing of the proposal is contrary to Policies CS7, RC5, RC1 RC13 and detailed guidance within the RSAF and the identified harm caused is not proposed to be mitigated. This is reflected in the first recommended reason for refusal.

iii) Affordable Housing and Housing Need

6.43 Policy CS16 (Affordable Housing) as revised in 2015, sets a requirement that 30% of all housing within relevant major developments shall be affordable. This requirement is also supported by the Council's adopted SPD, 'Affordable Housing'.

6.44 By way of background, application 162166 was initially submitted with 0% Affordable Housing. In discussions with officers it was agreed, at that time and in the absence of specific local policy to the contrary, that a Build To Rent (BTR) model was not conducive to accommodating Affordable Housing on site due to site-specific design and viability issues; but that the agreed surrogate site could be secured to provide 18% of Affordable Housing units, but as building land only, not completed units. This was provided together with a 'top-up' contribution and deferred payment mechanism in the S106, where that surrogate site could not achieve all the Affordable Housing provision required.

6.45 This baseline position is a material consideration to the assessment of the current application, as the earlier planning permission has been implemented and outline planning permissions related to the contractual obligations in the s106 attached to permission 162166 have also now been granted for development on the surrogate site (181652/OUT /181653/OUT).

6.46 The current package proposes to build on this agreed position, but in lieu of the top-up amount, the applicant is proposing a second surrogate site. At the time of writing this second site has not been identified.

- 6.47 This is a complicated Build to Rent proposal and at this time the Council's viability consultants are unconvinced of the relative merits of the proposed package over and above the currently approved package which was achieved in permission 162166. Despite this element of uncertainty, they confirm that even the best-case amount of Affordable Housing which appears to be outlined in the applicant's s106 offer/viability assessment does not achieve 30% Affordable Housing units on site, or equivalent within the range of values that they are currently evaluating.
- 6.48 A fuller assessment of this situation will be presented to Committee in an Update Report, nonetheless, officers recommend reason for refusal 2 in relation to this matter.

iv) **Other Matters**

- **Existing and Emerging Policy on Build to Rent**

- 6.49 Government Policy is set out in the National Planning Practice Guidance (NPPG accompanies the NPPF) at: <https://www.gov.uk/guidance/build-to-rent>. Build to Rent is defined in the NPPF Glossary as *"Build to Rent: Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."*
- 6.50 The guide at national level is for 20% of the dwellings to be Affordable Housing (Affordable Private Rent tenure) on site unless a commuted payment or other form of provision is agreed with the LPA.
- 6.51 The process for managing affordable private rent units should also be set out in the section 106 agreement. This should set out the parameters of the lettings agreement, the rent levels, apportionment of the homes across the development, a management and service agreement, and a marketing agreement setting out how their availability is to be publicised. The national guidance addresses the question of eligibility criteria for occupants and recommends a 3 year minimum tenancy.
- 6.52 Policy H4 in the emerging Draft Local Plan specifically deals with Build to Rent Schemes. It is considered that this policy can be given some weight. The initial findings of the Local Plan Inspector require the Council to provide more evidence on the appropriateness of the proposed 30 year Build to Rent tenure requirement (and the Rent with Confidence Standards). This implies that other aspects of the policy in respect of Affordable Housing and quality of accommodation and standards of design have been deemed to be acceptable.

- **Landscaping**

- 6.53 Discussions over appropriate landscaping of the road frontages and the interrelationship with proposed and future (MRT etc) highway works are ongoing. Any progress made will be reported in an Update Report. Although it is considered that all landscaping and highways-related matters are capable of being dealt with by way of conditions and a s106 agreement, as with 162166.

- **Amenity of Occupiers**

- 6.54 Whilst the density of the development would increase under the current proposals, there is no indication that the quality of the internal areas, (excepting daylight/sunlight matters) or access to outdoor amenity space would change. These aspects remain acceptable as described previously under 162166. Policies DM4 and DM10 apply.

- **Effect on Heritage Assets**

- 6.55 As with 162166, officers have considered the effects on all Heritage Assets which may be adversely affected by the application in consultation with the Council's Historic Buildings Consultant. Historic England advises that the Local Planning Authority can assess this and does not wish to comment.

- 6.56 There are many listed buildings whose settings could potentially be affected, but most are too distant from the application site. The nearest Listed Building is the Kings Meadow Baths (Grade II) and although an additional building mass would be presented to the Baths, creating some significant overshadowing very near to it, this would not directly affect the Listed Building. Given that the development is some 100 metres away and there are mature trees which screen for most of the year, the development would not overshadow the baths and the general setting within Kings Meadow would remain (albeit it will be altered by the presence of the development). Overall, officers are satisfied that the harm to the setting of the Baths which may occur would increase as a result of the increased massing proposed but would not increase to such an extent as to suggest a switch from the "less than substantial" level identified previously to "substantial harm" within the terms of paragraphs 195 and 196 of the NPPF. The level of harm remains "less than substantial" within the terms of Policy CS33 and the NPPF's guidance regarding the effects on Heritage Assets.

- 6.57 Similarly, effects on the prison (Grade II) the Abbey Ruins (Scheduled Ancient Monument) and the Forbury Gardens (a Registered Garden) would be less than substantial harm. Clear views from both Forbury Gardens and Caversham Court Gardens (again Registered) are not possible, due to tree cover and the scale of the proposal. Whilst the development would be seen from views from St. Lawrence's Church (Grade I), there would be a limited impact on its setting, given that the tower would just be visible over the lower eastern element of the church. Views out of the Market Place (Conservation Area) would be largely unaltered, although the presence of the tower would be discernible.

- 6.58 It is considered that impacts on heritage assets remain reasonable (less than substantial) and that giving the impacts on their settings and views considerable importance and weight would not be so significant as to override the policy aims which seek a dense development on this site, incorporating a 'local landmark'.

- **Mitigation of wind speed/turbulence**

- 6.59 Approved application 162166 was supported by a wind/microclimate study to support the submitted design. This document was reviewed by the Building Research Establishment (BRE) on behalf of the Council. Officers had concerns for the usability and attractiveness of some of the external amenity areas with the Swan Heights proposal and these areas have again been the focus of concern with this current application.

- 6.60 Concerns were raised by the BRE on 162166 but following detailed discussions, the BRE was able to advise that the proposed wind conditions would be safe within the whole of the development (street level and on the elevated terraces) and appeared to be suitable for the intended usage of the site, subject to various caveats.
- 6.61 With the 162166 scheme it was concluded that there will be opportunities to use the roof terraces at all times of the year for at least short periods and a significant amount of the terraces will be suitable for longer periods of sitting throughout the year. It was agreed that for reasons of comfort, the South-Western terrace on Level 12 should have its parapet height increased to 1.6m and that this should be set out in a planning condition.
- 6.62 With regard to the current scheme, the applicant has submitted a brief note from their microclimate consultant which states that *“At ground level, the key factors dictating the wind conditions are consistent between both previous and revised designs. Therefore, the wind microclimate is expected to remain unchanged.”*

At the elevated levels, the majority of locations are expected to remain comfortable for outdoor seating purposes, with the tested mitigation measures in place. A minor deterioration of wind conditions could potentially occur at one or two elevated terrace locations, where the wind comfort criteria for long-term sitting in summer may be exceeded. However, the wind conditions are still expected to be tolerable for sedentary recreational activities”.

- 6.63 This conclusion is not conclusive and does not appear to have been verified by either a computer simulated model or a physical model in a wind tunnel. It is also reasonable to expect these outputs to be tested by an independent body for the LPA, which previously was the BRE. Officers have not involved the BRE at this stage due to the other concerns expressed elsewhere in the report in order to avoid abortive costs to the Applicant. However this does mean that it has not been demonstrated that a suitable, or in fact safe, wind and microclimate environment will be achieved and as such the proposals are currently contrary to CS7, RC5, RC9, CS13, CS34, DM4 and DM10. A reason for refusal reflecting this is recommended. It is acknowledged that this could potentially be overcome through completion of a fuller assessment, involving third-party verification of the findings, but this has not been offered or agreed with the applicant at this time.

- **Suitable Levels of Daylighting and Sunlighting**

- 6.64 The BRE was also instructed to assess daylight and sunlight on behalf of the Council in respect of 162166 and advised at that time that the compliance rate for daylight provision to the proposed flats would be high, compared to the majority of flats in urban areas. Obstructions to light entering the flats would be minimal due to the avoidance (and removal) of balconies and the most obstructed flats are the lower flats in the Level 03 courtyards.
- 6.65 Light impacts on surrounding residential properties was also suitably modelled for 162166 in this scheme and no significant issues of overbearing, glare, etc. were identified. Although impacts on Kings Meadow have not been modelled, the BRE did not raise any concerns for this. Given the above, although there will be limited instances where light penetration to flats is not substantial, the scheme was considered to be acceptable indicates no conflict is identified with policies RC1, RC5, RC13 and DM4.

6.66 A revised daylight report has been submitted for the current proposal. This concludes that, *“The proposed scheme has been carefully designed to safeguard daylight amenity to the surrounding residential properties. Predominantly the reductions do not exceed 20%, which the BRE Guide states will be unnoticeable. The small handful of windows which experience reductions greater than this only do so by 25-28%, which are minor derogations from BRE Guidance and certainly not uncommon within urban areas. On planning balance these minor derogations from the BRE Guide are considered acceptable under the circumstances”*.

6.67 As with wind/microclimate, it is necessary for these findings to be verified given the significant increase in height and massing proposed and the inherent complexities of daylight and sunlight assessment. As with wind, officers have not involved the BRE at this stage due to the other concerns expressed elsewhere in the report in order to avoid abortive costs to the Applicant. However this also means that it has not been demonstrated that a suitable daylight and sunlight environment will be achieved both within and surrounding the development and as such the proposals are currently contrary to RC1, RC5, RC13 and DM4. A reason for refusal reflecting this is recommended. Similarly, it is acknowledged that this reason may be overcome through completion of further assessment, involving third-party verification of the findings and further modelling/adjustments to the development, where necessary.

- **Residential mix**

6.68 Reason for refusal 11 of the Swan Heights scheme related to the failure of the mix of units to accord with RCAA Policy RC9 although application 162166 was suitable in terms of mix. The supporting text to RC9 states that the aim of the policy is to make sure that housing in the centre is not unnecessarily limited, hence the minimum percentages set out in the Policy. These major developments must contribute to providing choice of housing unit sizes and thereby mixed communities in the town centre. The proposed mix reflects the proportions of that previously proposed and is as follows:

Studio - 38 units

One bed - 99 units

Two bed - 183 units

Three bed - 18 units

- **Residential Outlook**

6.69 Outlook from the dwellings is generally good, with many units being dual-aspect. The easterly elevation includes side windows overlooking Napier Court. Officers, when considering the previous application 162166, concluded on balance that although the relationship with Napier Court was not ideal due to future development potential, it was not harmful enough to warrant a refusal of permission as causing conflict with Policy DM4. There is no evidence to suggest a different approach with the current scheme.

- **Air Quality and Noise**

6.70 The air quality assessment submitted with the application shows that at some heights, the air quality is above national objective levels for Nitrogen Dioxide and this is primarily due to proximity to the railway line.

6.71 The mitigation proposed to protect future occupants in internal spaces is for Mechanical Ventilation and Heat Recovery (MVHR) units to be installed with the intakes at a sufficient height to provide clean air and a condition is recommended. All windows would also be openable. The noise assessment submitted shows that the recommended standard for internal noise can be met, if the recommendations from the assessment are incorporated into the design. The design of the MVHR units is still being considered by the Council's Environmental Health Officers and it is recommended that as with 162166 a condition be attached to any consent to secure the precise design of ventilation etc and ensure that the glazing and ventilation recommendations of the noise assessment will be followed, to comply with policies RC9, CS34 and DM4.

- **Other S.106 requirements**

6.72 The applicant has agreed to a land swap to facilitate the MRT route along Napier Road. Furthermore, based on 162166 the following would be required as planning obligations to be secured by S106 agreement:

- (i) £128440 towards improvements to Kings Meadow park (commensurate with previous contribution secured under 162166 and necessary to mitigate the increased use of the park anticipated as a direct result of the development);
- (ii) £100,000 towards improvements to the Vastern Road railway underpass (index linked from date of 162166 permission)
- (iii) £86,700 towards a new signalised pedestrian crossing on Kings Meadow Road (index linked from date of 162166 permission)
- (iv) £46,915 to establish an on-site car club (index linked from date of 162166 permission)

- **Flooding**

6.73 The RC1h site in the RCAAP requires that an acceptable dry access scheme must be part of any development on this site. The site was also included in the Council's Strategic Flood Risk Assessment (SFRA).

6.74 In determining this application, the Council must ensure that the sequential test is satisfied. The first stage of the sequential test has been satisfied as the site is allocated in the Development Plan. The extent of the Sequential Test is therefore limited to the siting of development *within* the site itself which has largely been established under recent permission 162166.

6.75 As with 162166 it is considered that suitable confirmation of safe access during a flood and other usual good practice flooding controls has been demonstrated and the development poses no additional flooding risks in accordance with the NPPF and Core Strategy Policy CS35.

- **Ground conditions**

6.76 The site was in car-related use for many years and prior to that industrial/railway-related use. The applicant's contamination report acknowledges that there is further remediation required in relation to an incident in 2013 where an oil tank was overfilled and there was contamination of watercourses including the Thames. The report also advises that there may be other historic pollutants present. The

Council's EP Team is confident that the site can be made suitable for the proposed development, but further investigations into the extent of historic contamination of the site and any remediation as necessary are required before the development takes place. The EP Team recommended that contaminated land conditions and a multi-part land gas condition is also required in order to comply with Policy CS34. These have largely been dealt with during the initial construction works associated with implementation of permission 162166.

- **Noise generation from the development**

6.76 This major development is likely to include noise-generating plant. An acoustic assessment would need to be submitted for such, carried out in accordance with BS4142:2014 methodology. Noise impacts during construction would be managed with a Construction Method Statement. This was dealt with by condition under 162166 and the same approach would be appropriate for the current scheme.

- **Sustainability and Energy**

6.77 As with 162166, overall, officers are satisfied that the development is capable of meeting and exceeding the Building Regulations and is being designed with energy considerations in mind. It is advised that any permission should be subject to a condition to seek that the build takes place in accordance with the energy/sustainability statements and supplementary letter supplied, in order to meet the policy and SPD objectives.

6.78 The Council's adopted suite of sustainability policies is CS1, DM1 and DM2 and the Council's revised SPD on Sustainable Design and Construction.

- **Building Maintenance Arrangements**

6.79 The application includes a building management framework report which indicates that upper floors will be cleaned via abseil and not building maintenance units (BMUs). This will ensure that there will be no unsightly cleaning apparatus on the roof of the building and a condition can confirm this. This addresses one of the criteria of Policy RC13.

- **Fire Safety**

6.80 As with 162166 although fire safety within buildings is not a material planning consideration (it is dealt with under The Building Regulations), if the application were to be recommended for approval, officers would request additional information in terms of a fire strategy and fire resistance for completeness.

- **Provision of MRT Route, Parking and Servicing**

MRT

6.81 The NPPF requires development plans to set out opportunities for ensuring modal shift to more sustainable travel modes and protecting land for strategic transport projects (paragraphs 35 and 41). In relation to this site, this is reflected in Core Strategy policies CS20 which requires implementation of the Reading Transport Strategy, CS21 which seeks the realisation of major transport projects and RCAAP Policy RC1 which requires land to be safeguarded for mass rapid transit

infrastructure. The RCAAP plan (Figure 6.2) shows the site on the MRT route, with a transit stop. Furthermore, point iv) of Policy RC1 requires that development in the Station/River Major Opportunity Area will safeguard land which is needed for mass rapid transit (MRT) routes and stops. The tall buildings policy, RC13, includes reference to such developments coming forward in a 'coordinated manner', which indicates the strategic transport requirements applicable to the realisation of these sites. Officers note that the MRT remains a strategic objective in published policy. The recent refusal of the scheme by Wokingham Borough Council does not alter this and providing land for potential future schemes remains appropriate.

- 6.82 The layout of the application provide land within the application site to allow an additional lane for the MRT and a land swap has now been separately been formally agreed with the Council (as landowner). The proposal allows for a pedestrian crossing of Kings Meadow Road and the provision of an adjusted pedestrian route, segregated from the main highway.

Parking

- 6.83 Given the highly accessible nature of the site, the parking level is considered to be acceptable. The usual conditions that no parking permits will be issued to residents can be applied. The site is very accessible to the north station entrance and the town centre. The site is also a good candidate site for a car club and the applicant has signalled a willingness to provide this although further detail is required as per Transport comments in the consultation section above.
- 6.84 Overall, officers are satisfied that the development is suitable in terms of the way it has been designed to accommodate the wider strategic requirements of the MRT route, the maintenance of pedestrian 'desire lines' and safety, adequate parking with thought given to sustainable modes of transport and suitable servicing. The physical aspect of the proposals is therefore compliant with policies CS4, CS20, CS21 and CS22, Policy DM12 and the Parking and Design SPD, as well as the Council's broader stated aspirations for MRT and public parking (the S106 agreement obligations are dealt with separately above).

- **Equalities Act and Accessibility**

- 6.85 The application explains the approach to accessibility in the DAS. Inclusive design is to be part of the brief to all designers involved in the scheme. This includes:
- setting out suitable levels and gradients across the site
 - relating the building to local transport infrastructure
 - access to the landscaping, architecture and the accommodation provided with all areas of external paving having a smooth, walkable surface.
 - considerations of the Building Regulations Part M, BS 8300 and best practice.
 - designated disabled parking bays will be located in close proximity to the main core from within the car park.
 - the main lobby will have disabled access toilets and a concierge desk designed in accordance with Part M.
 - designated flats will be wheelchair adaptable to meet the specific requirements of residents.
 - passenger lifts are sized for wheelchair users and stairs are suitable for ambulant disabled people and corridors and doorways are widened.

- 6.86 Attention will need to be paid to the external elements under consideration of hard landscaping details via conditions. A further condition should be added for the retention/provision of adaptable units, in order to meet Policy CS5. As with all taller building proposals, it is important that all lifts function at all times and this should also be subject to a condition.
- 6.87 In determining this application, the LPA is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. Conclusion and Overall Planning Balance

- 7.1 The report on the previous scheme 162166 concluded that in terms of massing, height and responding to local context, the application proposal was much-improved over the previously-refused 2015 (Swan Heights) scheme. This was due to a combination of the long process at pre-application stage to try to modulate the bulk of a large, high-density development for the site, but also latterly at application stage, where the applicant was asked to confirm the detailed design quality of the development.
- 7.2 It is considered that the current application is a retrograde step in design terms, undoing a good deal of work at pre-application stage prior to the approval of 162166. The absence of pre-application discussions for the current scheme is evident.
- 7.3 On the basis of the above report, it is considered that the Development Plan is not out of date and remains the starting point for decision making as per s. 38(6) of the Act.
- 7.4 The recent changes to the NPPF have little impact on the proposal, on the basis that the Development Plan remains relevant and local policy provides a strong framework for high-density tall buildings in the Central Area.
- 7.5 There are no convincing reasons for justifying a taller-than-policy building on the site. There are no mitigating factors evident.
- 7.6 The report identifies harm at 'benchmark' level in terms of the impact on views within and around the town and effects on the skyline.
- 7.7 The report identifies harm to immediate street scene and public realm due to the bulk, height and massing of the proposal as experienced from surrounding streets.
- 7.8 The report identifies harm in respect of the proportions of the resulting building. The lower 13 storey element is no longer subservient to the taller element and would compete visually with the slenderness of the tower, making it appear squat, as opposed to elegant. This also serves to accentuate the monolithic scale of the proposal.

- 7.9 The application fails to demonstrate that the proposals would be suitable in terms of daylight/sunlight and wind/microclimate.
- 7.10 It is considered that in general there is nothing inappropriate in terms of the style of the building (the façade materials, colours, general architectural approach etc) as a continuation of that approved under 162166, however, there is also nothing in the design detail to justify or mitigate the additional mass proposed.
- 7.11 Whilst there is little apparent harm to longer range views, such as those from the outskirts of the Borough, harm has been identified in terms of closer views as described in the report.
- 7.12 There are also clear benefits to the scheme in terms of Affordable Housing, in absolute terms because the scheme delivers Affordable units that would not otherwise exist; and in relative terms compared with the extant scheme 162166 as there is a material increase in provision. Whilst the precise level of provision is still subject to review, it is clear that the amount falls short of the 30% required under Policy CS16 and draft Policy H4. It is a benefit, but not to such an extent as to outweigh the harm identified arising from the bulk/massing/design of the proposal.
- 7.13 There are material benefits in terms of the additional 23 dwellings proposed. Although it should be remembered that this is less than 7% of the whole and would not provide additional housing to the extent that it should outweigh harm identified. Any benefit in terms of the provision of housing should also be tempered by the sub-30% Affordable Housing provision referred to above.
- 7.14 The extant permission is already very dense and the design is acceptable. The proposed design is also very dense but the design is harmful as described in this report.
- 7.15 The proposal provides benefits in terms of the proposed Build to Rent housing model, as set out in national policy and guidance and emerging policy H4 in the Draft Local Plan. These benefits are not directly linked to scale and the extant scheme provides much the same benefit.
- 7.16 The proposal provides clear economic benefits. These benefits are also achieved to a large extent by the extant permission and offer minimal additional weight in respect of the current proposal.
- 7.17 Other social benefits are referenced by the applicant in terms of the provision of housing, the new pedestrian crossing, Employment Skills and Training, public transport (MRT) and an exemplary fire strategy. Other than housing, (referred to above) these benefits would not increase substantially with scale and would largely be achieved under 162166, which is currently under construction.
- 7.18 The applicant suggests that the proposal would have environmental benefits in terms of remediation of contaminated land, tree planting, habitat enhancements, Carbon Dioxide reduction and public art. However it is apparent that the remediation has already taken place under 162166. It would also appear that tree planting is minimal given the constrained nature of the site. Habitat enhancements associated with the scheme are not particularly notable. CO₂ reduction is a standard policy requirement. Public art under the railway bridge is welcome and would provide some visual improvement. Overall the environmental benefits are

relatively typical of a scheme of this nature and would not in themselves outweigh the harm identified.

- 7.19 Overall it is considered that the harm identified is significant and contrary to Development Plan policy. The relevant policies in the Development Plan are not out of date and the proposal does not comply with the Development Plan for the reasons given in this report. There are no material considerations, including those set out in the NPPF or in terms of the direct benefits of the proposal, that outweigh this harm. It is therefore recommended that planning permission be refused for the reasons described in the recommendation at the head of the report.

Case Officer: Steve Vigar

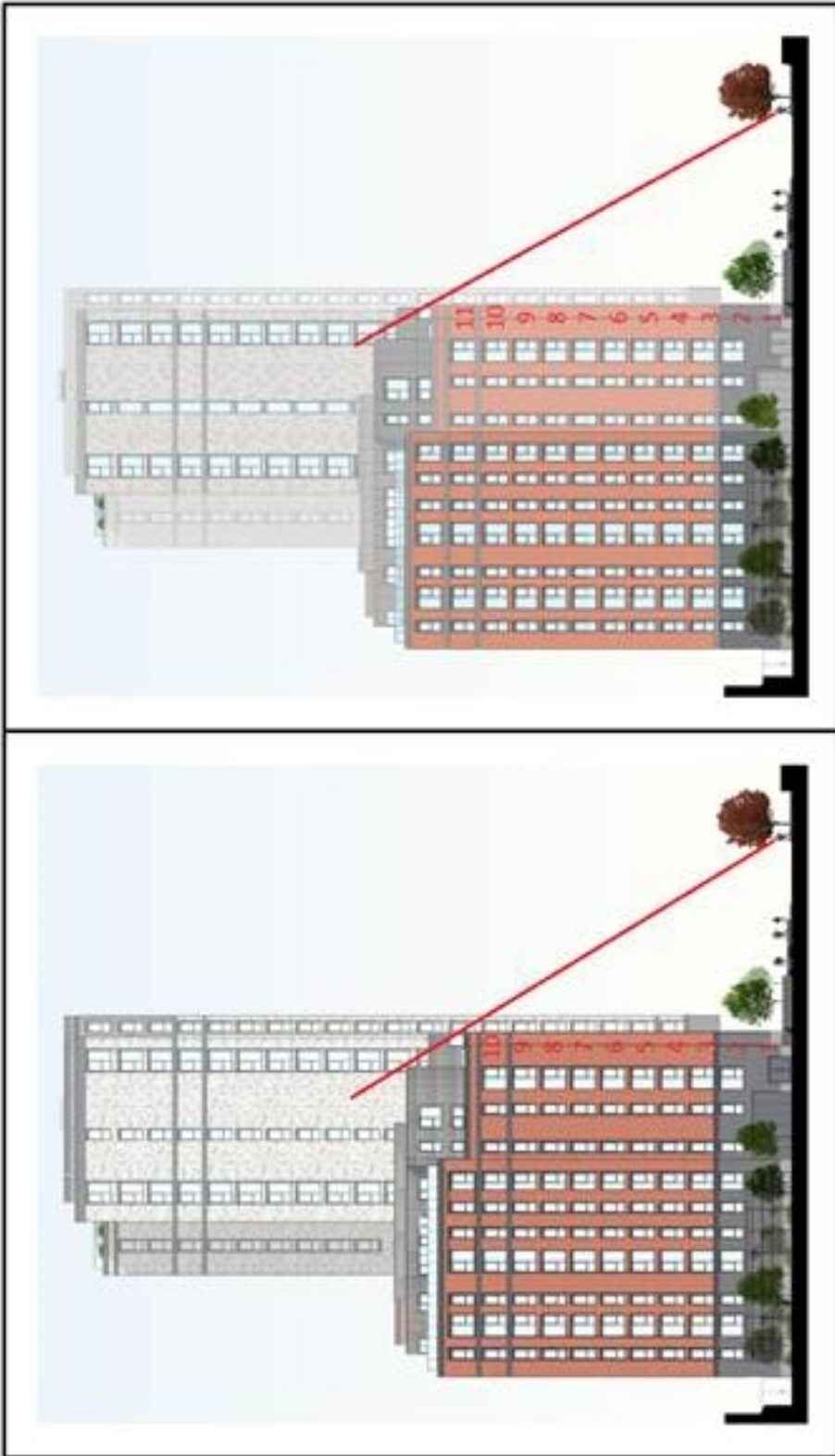
Drawings - Selection Only. Full set available at <http://planning.reading.gov.uk/>



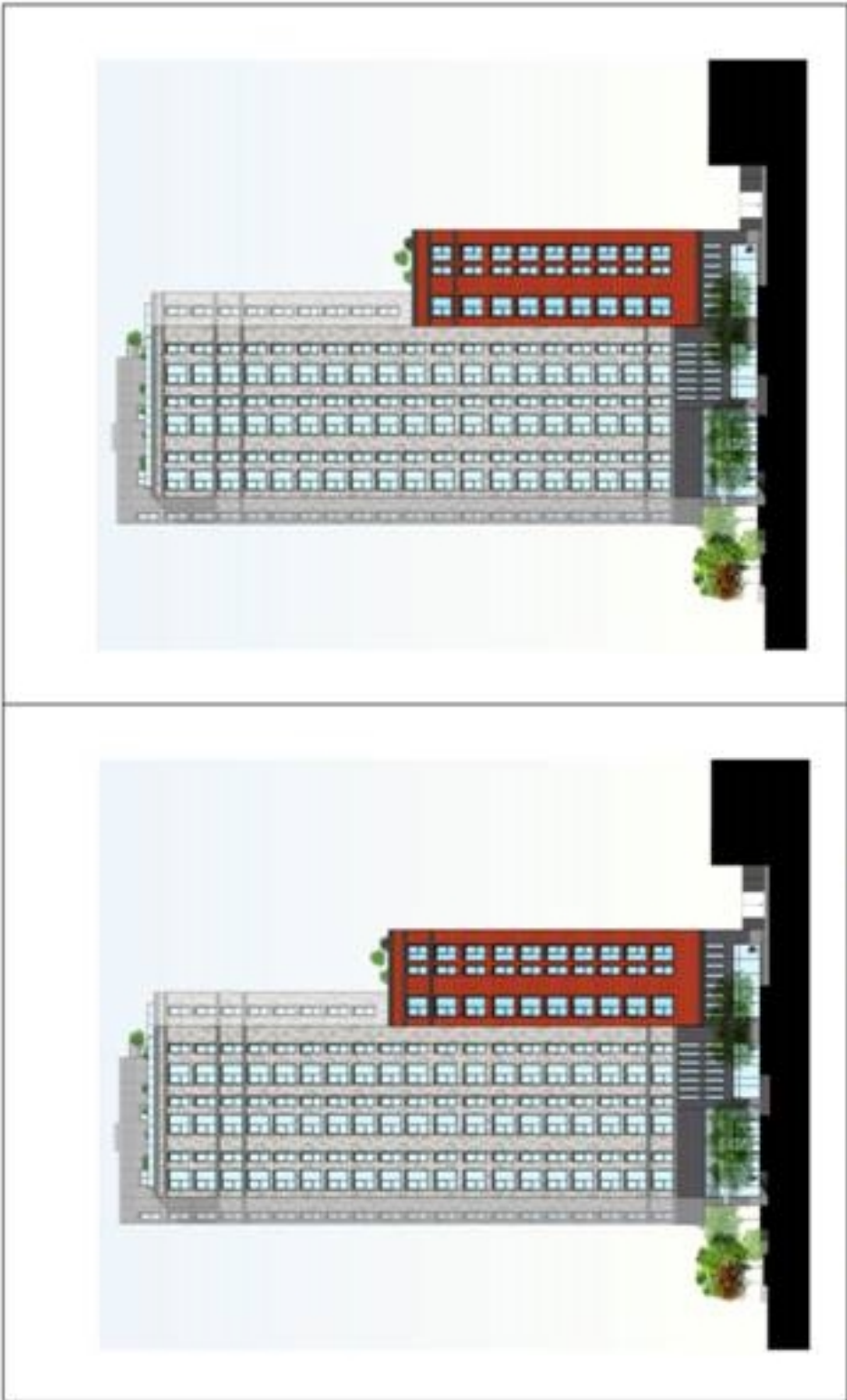
Consented scheme compared to existing tall buildings
Image Credit: CallisonRTKL

Proposed scheme compared to existing tall buildings

Comparison diagram from Design and Access Statement



East Elevation - Comparison image provided by Applicant (Applicant's annotation)



West Elevation Comparison image provided by Applicant.



Proposed North Elevation (to Kings Meadow Road)



South Elevation
1 - 2000

Proposed South Elevation (to Railway)

Proposed Ground Floor/Site Plan

Responsibility is not accepted for errors made by others in using this drawing.
 All construction information must be taken from signed documents only.
 500mm
 1000mm



Level 00
 1:200

NO. MS-TR-042319-01 Rev. 01
 REV. BY: DATE DESCRIPTION
 CLIENT M&G INVESTMENTS
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Project Name: Thames Quarter
 Reading

DRAWING TITLE
 Floor Plan - Ground Floor

STATUS	SCALE
PLANNING	1:200 @ A1
PROJECT ORIGINATOR / NUMBER	ROOM
152067-STL-10X50	PL1



Photograph from Reading Bridge (10/4/19)



Photograph from Forbury Road (5/4/19)