

COMMITTEE REPORT

BY THE DIRECTORATE FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 17th July 2019

Ward: Park

Application No.: 190160

Address: "Alexander House", 205-207 Kings Road, Reading, RG1 4LW

Proposal: Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking and amenity space.

Applicant: P.J. Alexander Estates Ltd

Date Valid: 29 January 2019

Application target decision date: 19th July 2019 Extension of time agreed by the applicant - original target decision date was 2nd May 2019.

26 week date: 14th August 2019

RECOMMENDATION

REFUSE.

Reasons:

1. It has not been clearly demonstrated how this proposal for purpose-built student accommodation (PBSA) meets an identified need that cannot be met on those identified sites within the Emerging Local Plan allocated for student accommodation or on those sequentially preferable sites. Alexander House is a specifically allocated housing site within the Emerging Local Plan required to meet the Borough's identified housing needs. Its loss to an alternative use has not been justified and would further reduce the Council's ability to meet its housing need within its own boundaries. The proposal therefore does not comply with Policy H12 and Policy ER1g of the Emerging Local Plan and conflicts with the aims of the NPPF.
2. In the absence of a completed legal agreement to secure a construction phase Employment and Skills Plan and use of the living accommodation to be occupied as student accommodation (Sui Generis) only, the proposal will not mitigate its impact on the social and economic infrastructure of the Borough, contrary to Policies CS3 and CS9 of the Reading Borough LDF Core Strategy 2008 (Altered 2015), Policy DM3 of the Reading Borough LDF Sites and Detailed Policies Document 2012 (Altered 2015) and the Council's Adopted Supplementary Planning Documents on Employment, Skills & Training (2013) and Planning Obligations under Section 106 (2015).
3. 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 CS16 of the Reading Borough LDF Core Strategy 2008 (altered 2015), Policy H4 of the Submission Draft Local Plan 2018, the Council's Affordable Housing Supplementary Planning Document 2013 and Section 106 Planning Obligations (2015).

Informatives:

1. Plans and documents refused.
2. Positive and proactive working.

3. Reason for refusal 2 & 3 could be overcome by a satisfactory Section 106 Legal Agreement or unilateral undertaking
4. Refused scheme CIL (Community Infrastructure Levy) liable development.

1. INTRODUCTION

- 1.1. The application site comprises an existing two-storey office building located on the junction of Kings Road and Rupert Street to the east of Reading town centre. The building, which was vacant at the time of the officer site visit in February 2019, was built in the early 1990s as part of a wider development which also included the residential units of Saxon Court to the north on the junction of Rupert Street and Norwood Road. The building is 'L' shaped, fronting onto both Kings Road and Rupert Street, with vehicular access from the latter to a basement car park.
- 1.2. It is important to note that the site benefits from planning consent under application 162057 for the erection of basement and 4 - 7 storey building comprising 56 residential units (See planning history section) granted at PAC in March 2017.
- 1.3. The application site is within an Air Quality Management Area. Kings Road is a major transport corridor into and out of Reading (the A4/A329) to the east and is also designated as an 'Existing or potential treed corridor' in the adopted Borough Tree Strategy. The site is not within a Conservation Area, although it is relatively close to three: Alexandra Road (170m to the south), Eldon Square (220m to the west) and South Park (260m to the south-east).
- 1.4. The application site is located outside of the designated Reading Central Area Action Plan to the west and outside the designated Cemetery Junction District Centre to the east. The application site does not include any designated heritage assets, although the following are within the vicinity of the site:
 - Sardar Palace (149 London Road - Gladstone Club) Grade II listed building 30m to south-east of the application site;
 - Wycliffe Baptist Church (233 Kings Road) Grade II listed building 110m to the east of the application site
 - Entrance Lodges and Gates to Reading Cemetery (London Road) Grade II listed 240m to the east of the application site
 - Reading Cemetery Grade II listed park and garden, 250m to the east of the application site
- 1.5. The surrounding area comprises a mix of uses, predominantly residential, with office and retail/related uses in the wider immediate area. Both neighbouring buildings on the Kings Road frontage are in residential use, comprising The Pinnacle (approved in 2001) and Crossway Point (approved in 2003). Both are up to seven storeys in height. On Rupert Street, the neighbouring Saxon Court residential block is three storeys in height, typical of the more domestic scale in the area further to the north of the site.
- 1.6. Like the previous approved application on site, this current application is referred to the Committee owing to it being a 'major' development. The location site in relation to the wider urban area is shown below in Fig 3 and 4.



Fig 1. Site Location Plan (not to scale)



Fig.2 Existing Kings Road elevation (Existing plans)



Fig. 3 Aerial view looking north towards the Kings Road street scene elevation (Google maps 2019)



Fig. 4 Aerial view looking southeast towards the Rupert Street scene elevation (Google Maps 2019)

2. PROPOSALS

- 2.1. Full planning permission is sought for the demolition of the existing office building and construction of a new 182 bed purpose-built student accommodation (PBSA) development. The building would contain 7 storeys of accommodation plus lower ground floor (8 storey in total) together with ancillary landscaping, parking and amenity space.
- 2.2. More specifically, the proposed student accommodation would include a laundry room, bookable space / dining area, TV lounge, cinema room, games room and gym at lower ground floor and with 38 bicycle storage spaces would also be located at this level. The main entrance and frontage to the building would be accessed off King's Road at ground floor level, with reception area and a communal study room.
- 2.3. The student rooms would be arranged in 'clusters' of 5 to 9 rooms, with between 21 and 32 rooms on each floor. All floors are accessible by lift, whilst there are two internal stair columns. All 182 rooms within the proposal will be 1-bed. This will consist of 151 en-suite beds (84%), 6 en-suite beds with disabled access (3%), 20

studios (11%) and 3 studios with disabled access (2%). The proposed unit schedule is listed in the Fig. 5 below:

Floor	Ensuite Beds	Ensuite Beds (DA)	Studios	Studios (DA)	Total by Floor
Basement	0	0	0	0	0
Ground Floor	15	0	5	3	23
First Floor	29	1	2	0	32
Second Floor	27	1	2	0	30
Third Floor	27	1	2	0	30
Fourth Floor	23	1	3	0	27
Fifth Floor	21	1	3	0	25
Sixth Floor	11	1	2	1	15
TOTAL	153 (94%)	6 (3%)	19 (10%)	4 (2%)	182

Fig. 5 Proposed Unit Schedule (Planning Statement)

3. PLANNING HISTORY

Relevant planning history on the application site:

- 3.1. **87/TP/1249** - Erection of office block with associated car parking and 7 dwellings with associated car parking. Refused outline permission on 15/01/1988. Allowed on appeal 10/11/1989.
- 3.2. **89-01366-REM (891332)** - Construction of office building together with associated car park and 7 no. dwellings with associated car parking. Reserved Matters Approved 28/03/1990.
- 3.3. **90-00531-FUL (901103)** - Erection of two storey office block with semi-basement car park for 50 cars and two storey block of 7 flats with associated parking. Granted 23/08/1990.
- 3.4. **162057/FUL** - Erection of basement and 4 - 7 storey building comprising 56 (30x1, 18x2 & 8x3-bed) residential units (Class C3) with associated parking and landscaping, following demolition of existing basement and 2 storey office building (Class B1a). Granted

Neighbouring sites

- 3.5. The Pinnacle - **99/01128/FUL (992352)** - Erection of a five, six and seven storey residential property comprising flats, amenity space, car parking and ancillary accommodation following demolition of existing buildings. Granted following completion of legal agreement 05/01/2001.
- 3.6. Crossway Point - **03-00950-FUL (030376)** - Demolition of existing and erection of 98 'affordable' units (30 no.1,60 no.2, 6 no.3 & 2 no.4 bedrooms) within 7 storeys of accommodation with 66 car parking spaces and communal on-site amenity space. Granted following completion of legal agreement 11/11/2003.

4. CONSULTATIONS

RBC Transport Development Control

Summary: No objection subject to conditions.

Full comments:

“The site is located to the north of Kings Road (A329), a major transport corridor into Reading. The site is accessed to the east of Rupert Street, which forms a left-in/left-out vehicle crossover with Kings Road (A329). The site is currently occupied by a two storey office building with 47 parking spaces.

A329 Kings Road forms part of the Red Route ‘no stopping’ corridor which has been implemented along the bus route number 17. Rupert Street and the surrounding residential roads all have parking restrictions in the form of residents parking bays, shared use bays and double yellow lines preventing on-street parking. The shared use parking bays opposite the site permit free parking for a maximum of 2 hours between 8am-8pm. At all other times, these bays revert to permit holders only.

A detailed review of the pedestrian, cycle and public transport infrastructure in the vicinity of the site has been undertaken and included within Transport Statement. There is a major bus route with bus stops located on both sides of the carriageway and dedicated bus lanes allowing for bus priority in both eastbound and westbound directions. By foot, Reading College campus is within a 2-3 minute walk, whilst central Reading within a 15-20 minute walk. An on-road cycle route is promoted along the A329 Kings Road which provides a link between central Reading and areas of East Reading.

The proposals include demolishing the current Alexander House office building and redeveloping the site to create a seven storey, 182 bed student accommodation building consisting of 159 1-bed en-suite rooms and 23 studio rooms.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. The parking standards set for Halls of Residence located in this zone are 1 space per FTE member of staff and no requirements for students, however, there are no adopted parking standards for student accommodation which are provided “off campus” and operate as independent providers of higher education accommodation. Therefore, an application of this type is likely to be considered on its own merits considering local circumstances including access to public transport provisions and the availability of parking and on-street regulations.

The A329 Kings Road and the surrounding road network all have parking restrictions preventing on-street parking. It is proposed to provide 2 staff car parking spaces and 3 disabled car parking spaces located at the rear of the site accessed via Rupert Street. Students will not be permitted to bring cars to the site under the terms of the tenancy agreement and this will be reinforced in their welcome pack and welcome induction.

It is also stated that students and staff would not be permitted to apply for a parking permit to ensure that there is no detrimental impact on the local on-street parking. This will be controlled through the conditions and informatives applied to the consent if permission is granted. This approach complies with policy and is accepted by the Highway Authority.

A Student Accommodation Management Plan has been submitted with this application which details how the arrival and departure at the beginning and end of each academic year will be managed. During this period, the small area to

the rear of the property will be made available for parking and unloading, and managed by on-site staff. A pre-booked timeslot approach will be implemented during the arrival and departure period to minimise the highway impact.

The applicant has provided additional information (received by email from Nyra John of Barton Wilmore on 30/04/2019) which clarifies the following in respect of the how many students would be permitted to arrive at site at any one time:

“The students will agree half hour timeslots over the two check in weekends co-ordinated by our site team. We will limit numbers to 5 in any half hour slot. Where students arrive outside of their allocated timeslots we reserve the right to reallocate a slot later in the day.

On arrival, the procedure will be for students to drop their bags off and wait in reception while cars are parked off site so no car will be allowed to linger around the site. To ensure there is no backlog in reception we will have additional staff on site during the check in weekends to support moving luggage to rooms quickly.

On this basis there should never be disruption to local traffic flows and Homes For Students manage some much larger drop offs in an organised and well co-ordinated manner.”

In principle, this is acceptable but these details should be incorporated into the Student Accommodation Management Plan so that it is contained within a complete document. However, I am happy to cover this by condition.

An assessment of the likely trip generation of the residential development has been submitted using trip rates obtained from the national TRICS database which is a valid way to ascertain likely trip generation. It is noted that the student accommodation will increase the number of multimodal trips compared to the consented residential development. However, the proposed development will result in a significant reduction of car parking and as a result will lead to a reduction in vehicle trips on the network.

In accordance with the Council’s Revised Parking Standards and Design SPD, the development would be required to provide 1 cycle parking space per 3 staff and 1 space per 5 students. The cycle parking will be provided in the form of a semi vertical cycle rack located within the lower ground floor, which will be secure, covered and lit. Students and staff would be given a job to access through the CCTV monitored Rupert Street access to the level threshold external access doors.

The applicant should ensure that the refuse storage provisions comply with the Council’s Waste Management Guidance. The number of refuse bins for the redevelopment of Alexander House has been confirmed with the Council’s Waste Operations Team has been confirmed to be 12 landfill 1,100 litre bins and 12 recycling 1,100 litre bins. The internal bin store is located in the lower ground floor and a levelled threshold from the external access doors is provided to the rear of the site. The site management will ensure that the bins are moved from the internal bin store to the collection point prior to bin collection day. The bin collection point is identified on the Proposed Site Plan A-02-100 Rev 2 (received by email from Nyra John of Barton Wilmore on 30/04/2019) which is located within 10m from the access point of the site.

The applicant should be aware that there would be significant transport implications constructing the proposed building in this prominent location. If this

application is approved, a condition is required to ensure a Construction Method Statement is submitted and approved before any works commence on-site.

There are no further objections to this application, subject to the conditions attached.

Suggested conditions on any consent

Construction Method Statement

Vehicle parking space provided in accordance with approved plans

Bicycle parking space provided in accordance with approved plans

Bin storage

Parking permits 1

Parking permits 2

Prohibition on entitlement to a car parking permit.

Student arrivals / departures and Car Parking Management Plan

Travel Plan

Annual review of the Travel Plan

RBC Waste Minimisation & Recycling Officer

Comments included within Transport response above.

RBC Environmental Health - Environmental Protection (EP)

Summary: No objection subject to conditions.

Full comments:

“Environmental Protection concerns:

- Noise impact on development*
- Noise transmission between dwellings*
- Air Quality impact - increased exposure / new receptors*
- Construction and Demolition phase*

Noise impact on development

I have reviewed the noise assessment that has been submitted with the application.

This has specified suitable glazing and mechanical ventilation in order for suitable internal noise levels to be met.

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. It is recommended that a condition be attached to consent to ensure that the glazing (and ventilation) recommendations of the noise assessment (and air quality assessment, where relevant) will be followed, or that alternative but equally or more effective glazing and ventilation will be used. See recommended condition below.

Implementation of approved noise mitigation scheme

The glazing and ventilation shall be installed in accordance with the specifications recommended within the acoustic assessment submitted with the application (Apex Acoustics, 23/11/19, report ref 7102.1).

Reason: to protect the amenity of future occupants of the proposed development.

Noise between residential properties - sound insulation of any building

Informative

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

Air Quality - Increased exposure

The air quality assessment submitted with the application concludes that the predicted levels of pollutants are below objective levels at the façade of the proposed property.

However, levels of NO₂ are elevated at the Kings Road façade. Therefore, it would not be advisable for the intake for the proposed mechanical ventilation to be from the Kings Road façade.

Can it be confirmed where the intake will be?

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Recommended conditions

Control of Noise and Dust - CMS to be submitted

No development shall take place before a scheme has been submitted to and approved in writing by the Local Planning Authority, which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase. Thereafter, the use shall not commence until the approved scheme has been fully implemented.

Reason: To protect the occupants of nearby residential properties from noise and dust during the development of the site.

Hours of Working - construction and demolition phase

The hours of noisy construction, demolition and associated deliveries shall be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior approval from the Local Planning Authority.

Reason: In the interests of the amenities of nearby residents.

Bonfires

No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development hereby approved shall be burnt on site.

Reason: In the interests of air quality, the amenity of neighbours, and to promote more sustainable approaches to waste management in accordance with Policies CS34 (Pollution and Water Resources) and CS2 (Waste Minimisation) of the Reading Borough LDF Core Strategy 2008.”

RBC Natural Environment Team

Summary: No objection subject to conditions.

Full comments:

“It would appear that the landscaping is the maximum achievable within the proposed scheme. The success of the scheme and critical tree planting within the site is dependent on an adequate viable rooting volume provision being made for the trees new trees the property. These trees will need to be potentially large specimens in keeping with the scale of the new building. They will need good quality soil in order to fulfil their potential. This is likely to include an engineered rooting area made up of soil cells in order to ensure healthy tree growth. Furthermore, it would be desirable for the on-site drainage to filter through tree planting cells to provide adequate irrigation in accordance with Chapter 19 of the Ciria SUDS Manual.

If planning permission is granted, the following conditions would be required:

- Pre-commencement submission and approval of hard and soft landscaping, services etc (standard condition but please include engineered tree pit / rooting area / drainage specifications)*
- Pre-occupation submission and approval of a schedule of landscape aftercare and maintenance covering a minimum of 5 years. Maintenance to be carried out as per the approved document.*
- Implementation of approved soft landscaping in the planting season following or at the time of completion, whichever is soonest.*
- Replacement planting for anything that dies within 5 years of planting”.*

RBC Ecology

Summary: No objection subject to conditions.

Full comments:

“The application site comprises a detached building where it is proposed to demolish the existing office building and to erect a new student accommodation building.

A previous application (ref: 162057) was granted for the erection of a basement and a four - seven storey building following the demolition of the existing basement and two-storey office building. Additionally, a pre-application (ref: 181289) with similar plans and the same ecological reports (Ecological Appraisal and Building Inspection Report: Ref P16/35 1A; October 2016 and Phase 2 Bat Survey Report: Ref P16/35 2A; October 2016) was submitted. As per our previous

comments on the pre-application, since the plans are similar, it would have not been necessary to submit new ecological reports with a full application.

Nevertheless, the applicant has submitted a new Ecological Impact Assessment (ECOSA, January 2019). The report has been undertaken to an appropriate standard and details the results of a preliminary ecological appraisal and the results of a dusk emergence survey carried out in August 2018.

The report states that the majority of the site is dominated by a single building and hardstanding, with two small areas of mown amenity grassland, a small patch of introduced shrub and two ornamental trees. The report states that no bats emerged from the building during the survey and that no evidence of other protected species was found on site. The report concludes that the loss of habitats on site "is considered to be of negligible significance" and that the proposals are unlikely to adversely affect bats or other protected species. However Condition 6 of planning consent 162057 (pasted below) should be attached to this application.

In summary, subject to the condition below, there are no ecological objections to this application on ecological grounds.

Condition:

i) No development (except demolition) shall take place until full details of both hard and soft landscaping have been submitted to and approved in writing by the local planning authority. The submitted details shall include:

- a) pedestrian access and circulation areas, hard surfacing materials (with the use of permeable materials wherever possible), outdoor structures and ancillary objects (raised planters, railings etc);
- b) proposed and existing functional services above and below ground (e.g. drainage, power, communications cables and pipelines indicating lines, SuDS, manholes etc);
- c) planting plans; written specifications (including cultivation, tree pits and other operations associated with plant establishment); schedules of plants, noting species (to include large canopy, native and wildlife friendly species, and species likely to prove adaptable to climate change), noting species, planting sizes and proposed numbers / densities, where appropriate.
- d) Biodiversity enhancements, including bird and bat boxes, tiles or bricks on and around the new building
- e) Details of the green roof structures, substrate and planting plans

ii) Prior to the first occupation of any residential unit hereby approved, a landscaping management plan, including long term objectives, management responsibilities and maintenance schedules for the landscape areas, covering a minimum of 5 years shall be submitted to and approved in writing by the local planning authority. The landscaping management plan shall be carried out as per the approved document.

iii) All hard landscaping works shall be carried out in accordance with the approved details prior to first occupation of the development.

iv) All planting and other soft landscaping shall be provided before the end of the first planting season following the first occupation of the development, or at the time of completion, whichever is the soonest.

v) Any trees or plants that within a period of five years after planting are removed, die, or in the opinion of the Local Planning Authority become seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of the species, size and number as originally approved.

REASON: To ensure provision and retention of suitable hard and soft landscaping in the interests of the appearance of the development and wider area in accordance with Policies CS7, CS33 and CS38 of the Reading Borough LDF Core Strategy 2008 (Altered 2015) and Policy DM18 of the Sites and Detailed Policies Document 2012 (Altered 2015)."

RBC Leisure and Recreation

No comments received.

RBC Sustainable Urban Drainage System (SuDS) (Via RBC Transport, in conjunction with RBC Streetcare Services Manager - Highways)

Summary: No objection subject to condition.

Full comments:

"I have reviewed the SuDs proposals and I can confirm that it is acceptable subject to the below condition.

Sustainable Drainage

No building / dwelling hereby permitted shall be occupied until the sustainable drainage scheme for the site has been completed in accordance with the submitted and approved details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan. In accordance with NPPF Paragraph 103, Core Strategy Policy CS1 and Sites and Detail Polices document Policy DM1

For info my colleague Natalie will be providing the transport comments."

Berkshire Archaeology

Summary: No objection subject to condition.

Full comments:

"Thank you for consulting Berkshire Archaeology regarding the above application. Berkshire Archaeology is part of Reading Borough Council's Museum and Town Hall Services and provides historic environment advice to the five unitary authorities of Bracknell Forest Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council and Wokingham Borough Council. This consultation response relates solely to the buried archaeological heritage. Advice relating to the built environment and listed buildings is provided by the Borough's Conservation Officer.

This application is supported by a 'Heritage Desk-Based Assessment' (Orion, November 2018), which is largely similar to that submitted in relation to a previous, similar proposal for this site (Application 162057). The current proposal is not materially different to the previous proposal as regards the buried archaeological heritage and so Berkshire Archaeology is in agreement with the conclusions of Orion's assessment report. We therefore reiterate our previous advice as follows.

The application site is located within an area which has demonstrable potential for archaeological remains dating from the prehistoric, Roman and medieval periods. This includes features, including burials, associated with a medieval leper hospital about which little is known. While the construction of Alexander House will have reduced the site's archaeological potential, there remains the possibility that isolated pockets of archaeological remains will survive.

On this basis a programme of archaeological work to mitigate the impacts of the development, should the proposal be permitted, can be secured by an appropriately worded condition. This is in accordance with Paragraph 141 of the NPPF which states that local planning authorities should 'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

The following condition is therefore proposed:

Condition:

No development shall take place within the site, other than demolition to ground level, until the applicant, or their agents or their successors in title, has secured the implementation of a programme of archaeological work (which may include more than one phase of work) in accordance with a written scheme of investigation, which has been submitted to and approved in writing by the Local Planning Authority. The development shall only take place in accordance with the detailed scheme approved pursuant to this condition."

Crime Prevention Design Advisor (CPDA) at Thames Valley Police

Summary: No objection subject to conditions.

Full comments:

"I consider some aspects the design and layout to be problematic in crime prevention design terms, creating an environment that could attract crime, increase the fear of crime and vulnerability of the young people (students) occupying the building. I therefore feel that the development does not meet the requirements of:

- *Reading's planning policy Reading Central Areas Action Plan 2026 section 5.27 " It (the development) should provide continuity and enclosure with a high degree of active frontages. It should consider safety, security and crime prevention, which could include Secured By Design principles.*

Specifically these concerns relate to the privacy and security of ground floor student bedrooms and the physical security and access control into and throughout the building, I believe these concerns can be dealt with via minor amendment and the inclusion of a planning condition (physical Security) .

Observations, recommendations and requested condition to address the physical security of the building.

Crime Risk: *In the immediate areas of Rupert Street: Reports of criminal damage, ASB, violence and sexual offences vehicle crime, theft and robbery have been*

reported. Within the wider area Rough sleeping in communal areas of residential blocks is a Neighbourhood priority. Student accommodation has its own risks and needs. Home Office research shows that “Students are, statistically, one of the most likely groups to fall victim to crime. Added to that fact, young people (aged 18 to 24 year old) are around three times more likely to be victims of burglary than people in other age groups, which makes students all the more vulnerable.”

Landscaping /Defensible space: I have concerns that the proposed landscaping will not provide sufficient security or privacy to the occupants of the ground floor student bedrooms.

Students within ground floor rooms that lack defensible space may be inclined to keep curtains/blinds permanently closed in order to prevent strangers (who are legitimately in the public realm) from looking into their private bedrooms, this in turn, presents inactive ground floor frontages and restricts surveillance onto the public realm, increases the fear of crime, ASB and vulnerability of the young people (students resident) on the ground floor. This is a concern, all ground floor bedroom windows should be provided with appropriate off set between the private bedroom window and public footpath, providing the young person with suitable privacy, security and ownership over the area immediately outside their window.

- *King’s Road:* The DAS identifies that the Southern and West facia “benefits from a green buffer” and public realm seating areas to the streets capes of King’s Road and. In addition I note illustrative plans depict a glazed barrier (or balustrade) but it is unclear if this extends to enclose the private bedroom windows. I ask that additional details regarding the design of this balustrade/ fence line be submitted and approved prior to planning permission being granted, I ask that.
- *Rupert Street;* The DAS describes a “Mixture of soft / hard landscaping to strip adjacent to pavement: to include including raised planters” The proposed raised planters are shown as 1.0m in height with no additional; boundary/ fencing. Again I have concerns that this design will not provide sufficient security or privacy to the occupants of the ground floor student bedrooms. I ask that the design of the planters be amended to include the addition of 0.5m open topped railings, this amendment will present greater height and security whilst maintaining surveillance (and protecting the inner planting) I ask that boundary plans showing detailed design of the amended planters/open topped fence be submitted and approved prior to planning permission being granted.

Vehicle/ pedestrian cycle access off Rupert Street: The proposed rigid louvre design will restrict natural surveillance, students exiting the rear court yard should be able to see who and what is happening in the recessed public realm before they open the gates. I ask that the vehicle and pedestrian cycle gate certified to meet the minimum physical specifications of LPA1175 Issue 8 B3.

Bin store doors off Rupert Street. Given the identified crime risk the bin store doors must be robust and secure (and meet the minimum physical security standards of LPS 1175 issue 8 B3),

Postal services: I’m reassured to note that a dedicated post room has been proposed, Given the size of the development I ask that post boxes within the post room meet the requirements Federation’s Technical Standard 008 (TS 008).

Physical Security/Protection: I note that a reception *has* been proposed. The DAS also refers to lighting and CCTV. However, the DAS does not identify or provide details as to how the physical security of the development will be achieved or if provision has been made to prevent excessive permeability of unauthorised access between floors and corridors. Whilst connectivity and circulation should be encouraged this should not be at the expense of an students privacy or security. Crime and anti-social behaviour are more likely to occur where there are several ways into, through and out of residential areas (in this case each residential floor appears to be accessible from two separate cores, creating unrestricted and excessive circular permeability).

Consideration should be given to the possibility that in high density developments such as this, a small percentage of student or their guests may be motivated to access areas where they have no legitimate reason to be. If suitable access control is not included it would be possible for a student or their guests to gain unrestricted access any bedroom door, creating opportunity for crime, ASB and raising the fear of crime.

I understand that the development will benefit from a manned reception which will help create a feeling of safety. However, the presence of a receptionist should not replace the need for 'physical security', (over the life time of the development the manned reception could be withdrawn).:

Access and visitor entry: Whilst there may be a visitor call facility between the communal entrance and individual student rooms and communal areas, there should not be the facility for a student to release the entrance door from their room. The student should have to go to the entrance door to meet and greet their visitor. Any rooms designed for disabled occupation should be in close proximity of the main entrance so that they can easily get to the main door to greet their visitors, (or accept delivery of a 'take-away'). Consideration could be given to the disabled rooms only having a main entrance door release facility in their rooms.

In developments of this size, access control into and between residential floors must be implemented, enabling the young people to identify visitors whilst maintaining a safe and secure distance. Access to communal areas such meeting rooms, communal rooms bicycle storage facilities and bin stores should be treated in the same way and only accessible by authorised individuals.

Physical Security: I ask that a condition is imposed on this application to ensure that, any subsequent approved development is required to be secured by design Silver award. Such a condition will help to ensure that the development achieves the highest standards of design in terms of safety and security, safe guarding future residents.

Reason: Creating 'Safe and accessible environments where crime and disorder, and the fear of crime will not undermine quality of life or community cohesion'.

Condition:

No development shall commence until details of the measures to be incorporated into the development to demonstrate compliance with Secured by Design Silver Award have been submitted and approved in writing by the Local Planning Authority prior to commencement of work above ground . The development shall be carried out in accordance with the approved Secured by Design Application, and

shall not be occupied or used until the Council acknowledged in writing that it has received written confirmation of compliance.

To aid the applicant I have provided the following are some of the critical point and are an aid to achieving the above condition. The SBD application will provide the full requirements he award

- External Communal entrance: All external and internal Communal entrance doors will meet the requirements of LPS1175 Issue 8 B3; access controlled via the include of electronic remote release locking systems with audio/ visual intercom links (where required) to each Bed room.. This will allow students to identity their visitors (or food delivery) prior meeting and collecting them from reception.
- Include secure communal lobbies ; the secondary ground floor internal secure doorsets shall include an access controlled
- Compartmentalisation Larger developments incorporating multiple flats, bedsits or bedrooms can suffer adversely from antisocial behaviour due to unrestricted access to all areas and floors of the building. This can be achieved by controlled lift access (each resident is assigned access to the floor on which their bedroom is located). Fire egress stairwells should also be controlled on each floor, from the stairwell into communal corridors, to reduce the risk of them being used for anti-social behaviour or criminal activities.
- Individual student room: These entry doors should be to BS PAS 24:2016 internal door standard.
- Fire exists doors These should be alarmed as students may prop the doors open to have a cigarette or to allow access to friends etc. As a minimum they should be fitted with an unmonitored screech alarm to reduce opportunity for the doors to be propped open. Any high level external areas, such as the roof terraces should be able to be secured, should be enclosed with high sides to avoid the temptation for students/occupants to act in an anti social manner and for their own safety.
- Laminated Glazing- All ground floor or other easily accessible window frames should be to BS PAS 24:2016. Ground floor and easily accessible windows should incorporate 6.4mm Laminate glass. Also such ground floor or other easily accessible window should be fitted with opening restrictors, so that offenders cannot climb in if a window is left open. Window restrictors at upper levels should also be considered.

Reading UK CIC

No comments received.

Thames Water

Summary: Additional information required.

Full comments:

“We’re writing to tell you that application:

190160- Alexander House, 205-207 Kings Road, Reading RG1 4LS

Will need to approach us for a pre-planning application. They can find details here:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

Our sewer records don't indicate any shared drainage within the site, but there may be newly transferred sewers that we haven't yet mapped and aren't aware of.

If the site owner finds shared drainage, the sewers may need to be diverted, as we don't allow new builds over public sewers. They will need to submit their pre-development application to us and then discuss any potential diversions with the engineer dealing with their application."

Public consultation

Notification letters were sent to nearby occupiers including occupiers of Saxon Court (Norwood Road), Crossway Point, Sovereign Court and The Pinnacle (all Kings Road) and Kingdom Hall (Kingsgate Street), on 07/12/16. A site notice was erected on Kings Road on 09/12/16. No letters of objection have been received at the time of writing.

A total of 11 letters of support have been received from 8 separate addresses outside of those listed above as a result of a community engagement exercise undertaken by Quatro Public Relations Ltd on behalf of the applicant. A summary of the reasons for support are as follows:

- It will bring a vacant building back into use;
- it will help meet the need for student accommodation in Reading;
- It will provide student accommodation within walking distance of facilities, services and potential places of study;
- It will provide more places for students in professionally-managed student accommodation and reduce the pressure on local housing;
- It will be BREEAM 'Excellent'.

5. LEGAL AND PLANNING POLICY CONTEXT

- 5.1. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 5.2. 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.
- 5.3. 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'.]
- 5.4. The application has been assessed against the following policies:

National Planning Policy Framework (NPPF) (Feb 2019)

- Section 2 - Achieving sustainable development
- Section 3 - Plan-making
- Section 4 - Decision-making
- Section 5 - Delivering a sufficient supply of homes
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

Reading Borough Local Development Framework Core Strategy (2008, altered 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
- CS11: Use of Employment Land for Alternative Uses
- CS14: Provision of Housing
- CS15: Location, Accessibility, Density and Housing Mix
- CS16: Affordable Housing
- CS20-23 sustainable transport policies
- CS24: Car/Cycle Parking
- CS33: Protection and Enhancement of the Historic Environment
- CS34: Pollution and Water Resources
- CS35: Flooding
- CS36: Biodiversity and Geology
- CS38: Trees, Hedges and Woodland

Sites and Detailed Policies Document (2012, altered 2015)

- SD1: Presumption in favour of sustainable development
- DM1: Adaptation to climate change
- DM4: Safeguarding amenity
- DM6: Affordable housing
- DM10: Private and communal outdoor space
- DM12: Access, traffic and highway-related matters
- DM18: Tree planting
- DM19: Air quality

Emerging Reading Borough Local Plan (March 2018)

- CC1: Presumption in favour of sustainable development
- CC2: Sustainable design and construction
- CC3: Adaptation to climate change
- CC5: Waste minimisation and storage
- CC6: Accessibility and the intensity of development
- CC7: Design and the public realm
- CC8: Safeguarding amenity

EN1: Protection and enhancement of the historic environment
EN2: Areas of archaeological significance
EN4: Locally important heritage assets
EN12: Biodiversity and the green network
EN15: Air quality
EN16: Pollution and water resources
EN17: Noise generating equipment
EN18: Flooding and drainage
EM3: Loss of employment land
EM4: Maintaining a variety of premises
H1: Provision of housing
H2: Density and mix
H3: Affordable housing
H10: Private and communal outdoor space
H12: Student accommodation
TR3: Access, traffic and highway-related matters
TR4: Cycle routes and facilities
TR5: Car and cycle parking and electric vehicle charging
ER1: Sites for development in East Reading

Supplementary Planning Guidance

Revised Parking Standards and Design (2011)
Revised Sustainable Design and Construction (2011)
Revised S106 Planning Obligations (2013)
Affordable Housing (2013)

Other material guidance and legislation

Tree Strategy for Reading (June 2010)

National Planning Practice Guidance (2019)
The Community Infrastructure Levy (CIL) Regulations (Amended 2015)
Department for Transport 'Manual for Streets'
Department for Transport 'Manual for Streets 2'
Berkshire (including South Bucks) Strategic Housing Market Assessment - Berkshire Authorities and Thames Valley Berkshire Local Enterprise Partnership, Final Report, February 2016, prepared by GL Hearn Ltd
Site Layout Planning for Daylight and Sunlight: a guide to good practice (BR 209), P. Littlefair, BRE, 2011
Waste Management Guidelines for Property Developers, Reading Borough Council

6. APPRAISAL

The main issues are considered to be:

- 6.1 **Principle of development**

- 6.2 **Demolition, scale, appearance, design and effect on heritage assets**
- 6.3 **Residential amenity**
- 6.4 **Transport**
- 6.5 **Trees, landscaping and ecology**
- 6.6 **Sustainability, energy and drainage**
- 6.7 **Other matters**

6.1 Principle of development

Background

- 6.1.1 Members will be aware of recent concerns expressed over the development of new purpose-built student accommodation (PBSA) on sites that might otherwise be used to meet Reading's very significant need for general housing of 699 homes per annum (as referred to in the emerging Local Plan). This has become a particular concern within Reading town centre and follows a series of recent high profile planning applications, Office Prior Approvals and appeals relating to student accommodation.
- 6.1.2 As described above, this site has extant planning permission for 56 dwellings under application 162057, and is allocated in the emerging Local Plan for 26 to 38 dwellings. Loss of an identified housing site for alternative uses will reduce the Council's ability to meet its housing needs within its own boundaries; in addition to the existing shortfall identified in the Local Plan (as amended by the proposed Main Modifications) of 230 dwellings up to 2036.
- 6.1.3 The applicant makes the case that the provision of such private-sector student accommodation helps to free up other accommodation occupied by students, notably HMOs, for which there are high concentrations within close proximity to the University. Officers agree that this can be the case in some circumstances, but is dependent on whether such PBSA accommodation is priced at a level to offer a genuine alternative to HMOs and/or controlled by the University. This will be discussed later in this report. Critically, and in addition unlike a housing development, provision of PBSA does little to meet the Borough's very considerable identified need for *affordable* housing (406 homes per annum, according to the Berkshire Strategic Housing Market Assessment). Application 162057 would have delivered 17 affordable housing units, whilst a policy-compliant development in the range of the local plan allocation would have been provided 8-11 units, so this site is expected to make a significant contribution to the pressing need for affordable housing in the Borough.

Loss of existing office use

- 6.1.4 As with previously approved development on this site, the starting point with this current proposal is a need to establish whether the loss of existing office use on site is justified. Policy CS11 (Use of Employment Land for Alternative Uses) requires the LPA to consider a number of criteria when assessing proposals which would result in a loss of employment land/premises. At the time both approved application 162057 was determined and Pre-Application advice was provided in September 2018, the loss of the existing office use was accepted in accordance with the requirements of Policy CS11.
- 6.1.5 This current application now includes an updated Office Market Report produced in November 2018. The findings of this report do not show any deviation from the findings accepted in 2016 and 2018, and Officers recognise the low demand for the type of office accommodation that exists at Alexander House. In this regard the information continues to be viewed as sound justification for the loss of the existing office accommodation at the site. In addition, Officers are also mindful that the updated NPPF (paragraph 121) requires Local Planning Authorities to take a positive approach to planning applications for change to residential use from commercial buildings where there is an identified need for additional housing and there are not strong economic reasons why such development would be

inappropriate. With all of the above in mind, there are no compelling economic reasons to prevent the loss of the existing office use.

Emerging Local Plan Policy

- 6.1.6 Notwithstanding the approval of residential accommodation on site as part of application 162057, the site is specifically allocated for residential use within the Emerging Local Plan under Policy ER1g. This policy states:

*ER1g ALEXANDER HOUSE, KINGS ROAD
Redevelopment of offices for residential.*

Development should:

*Take account of potential archaeological significance;
Address noise impacts on residential use;
Address air quality impacts on residential use; and
Ensure appropriate back-to-back separation from existing residential.*

Site size: 0.16 ha 26-38 dwellings

- 6.1.7 By 'residential' this is taken to mean Class C3 accommodation, rather than (sui generis) student accommodation, for which there are explicit site allocations contained within the emerging Local Plan itself (e.g. sites ER1a, ER1e, ER2, CR13a, CR14l). The majority of these identified site allocations are located in close proximity to the Whiteknights Campus.
- 6.1.8 The previous approval for 56 dwellings and the emerging allocation for between 26 and 38 dwellings as part of the emerging plan, demonstrates a strong intention on the part of the LPA to support residential development on this site through both decision-making (as a windfall site) and through the advanced plan-making process. As described above, the previous approval and ongoing status as a site allocation within the local plan signifies the important role the site is intended to play in contributing to the Council's significant need for general housing and identified shortfall up to the end of the plan period in 2036. Whilst the implementation of permission 162057 cannot be guaranteed, it is nevertheless a 'hard commitment'. Further, the status as an Emerging Local Plan allocation would remain. Therefore, the loss of this specifically allocated housing site to an alternative use would reduce the Council's ability to meet its housing need within its own boundaries and conflict with the emerging Local Plan.
- 6.1.9 Although the Council's existing adopted Core Strategy (2008) and associated development plan documents accept in-principle the loss of employment use in this location where justified and the spatial strategy for new general and specific affordable housing need, there are currently no existing adopted policies specific to the location of new student accommodation. In a Borough such as Reading, with a substantial established student population and inherent constraints over delivery of new sites to meet its identified housing need, there has been an identified need for such a policy in the new local plan.
- 6.1.10 The Council's concerns about the pressure and issues raised by developments for student accommodation led to the specific introduction of Policy H12 in the emerging Local Plan. Put simply, Policy H12 '*student accommodation*' requires that new student accommodation be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing

student accommodation. Policy H12 contains a clear presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on those identified sites within the Local Plan or on those sequentially preferable sites.

- 6.1.11 Paragraph 4.4.98 of the emerging Local Plan ‘supporting text’ recognises that the provision of new student accommodation needs to be carefully balanced against the needs for other types of housing. The plan recognises the harmful effect of student accommodation preventing potential housing sites from being brought forward and contributing to meeting the more pressing needs for general housing, including that of affordable housing within the Borough. This underpins the clear policy objective for student accommodation to be limited to established student locations unless a specific need for a development in a certain location can be clearly demonstrated.
- 6.1.12 The implications of this specific locally-led policy, which responds to the unique makeup and housing pressures facing the Borough is central to proposals such as this. As such, Officers have a clear need to properly consider the appropriate weight to attach to any such relevant emerging policy in this committee report in light of this submitted planning application.
- 6.1.13 As the emerging Local Plan is at an advanced stage but not yet formally adopted, it is necessary and prudent for the LPA to seek to establish the level of weight this policy in the emerging plan may be given in order to aid the assessment of this current application. The Government’s suite of Planning Practice Guidance (PPG) states that the weight to accord a policy will ultimately be a matter for the decision-maker, in this case the LPA.
- 6.1.14 A starting point is to consider the NPPF 2019 and in particular the relevant parts under Section 4 ‘Decision Making’. Planning Law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 48 of the NPPF states that policies in emerging plans may be given weight according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*
- 6.1.15 In order to provide a full and considered assessment of weight to afford the draft policies (ER1g and H12), it is reasonable for the LPA as decision maker, to consider each of these tests in turn.
- 6.1.16 With regard to a), the Council (as LPA) has been through consultation on Issues and Options (January-March 2016), a Draft Local Plan (May-June 2017), and a Pre-Submission Draft Local Plan (November 2017-January 2018). The Local Plan was submitted to the Secretary of State on Thursday 29th March 2018. This marked the beginning of the process of public examination that took place during 2018. The Local Plan was subject to examination hearings in September and October of 2018. During the examination, the topic of student accommodation was specifically discussed.

- 6.1.17 The Council is now in possession of which main modifications the Local Plan Inspector has identified to the plan, and consultation on these began on Wednesday 12th June. At the time of writing this report, it is therefore a reasonable to determine that the Council is not only at an advanced stage in the new Local Plan process, but is now at a considerably advanced stage from when pre-application advice was provided prior to the local plan examination in September 2018 and now at a more advanced stage than when this planning application was received by the LPA in February 2019.
- 6.1.18 With regard to b), as described above, a number of objections to the proposed policy approach of H12 were received, and this led to discussion at the examination hearings.
- 6.1.19 The Inspector requested that the Council and University of Reading agree a Statement of Common Ground on the matters discussed at the examination, including student accommodation. The Statement was finalised in November 2019. The changes to the Local Plan agreed in this Statement (which have subsequently been identified as ‘main modifications’, currently subject to public consultation at the time of writing) included a recognition of an existing level of need for student accommodation of around 1,000 bedspaces. However, no fundamental change to the overall policy approach of H12 was agreed, and the University (and others) maintained their objections to this.
- 6.1.20 The Inspector has now identified the main modifications she considers are required for the plan to be sound and legally compliant, and consultation on these began on Wednesday 12th June. Other than the modifications agreed between the University of Reading and Council in the Statement of Common Ground (Dated November 2018), no further main modifications relating to student accommodation have been identified in response to objections. There is therefore now greater certainty on the outcome of the examination, and under a) and b) of paragraph 48 of the NPPF, the weight of the policy increases accordingly.
- 6.1.21 Finally, with regard to consistency with the NPPF, as described above, Policy H12 of emerging Local Plan sets out a sequentially preferable approach to the location of new student accommodation. Whilst the NPPF does not prioritise one type of residential use over another, there is nothing within it that prevents local policy from doing so where it has carried out a local assessment of the housing needs of the area and set policy accordingly. The fact that the housing needs of the Borough, in particular affordable housing needs, cannot be met in full (as strongly expected by the NPPF) means that it is important to manage competing demands for limited land, and the Policy is therefore considered consistent with the NPPF.
- 6.1.22 In summary, it is considered appropriate for the Council to afford significant weight to Policy H12 given the stage of preparation, lack of any specific unresolved objections and evident consistency with the NPPF. Of course, the LPA fully acknowledges that the Inspector’s report has not yet been published, and until such time as it has, there cannot be complete certainty on the outcome of the Local Plan. However, in light of the inherent stage at which the Local plan process is currently at (consultation on main modifications) and anticipated timescales, there is now greater certainty than ever surrounding the outcome of the examination and it would not be unreasonable for the LPA to follow Government guidance and apply weight to emerging policies to decision making where current policies are silent.

Need for student accommodation

6.1.23 In seeking to address the requirements of Policy H12, the applicant's justification for the requirement for additional student accommodation centres on existing and future student accommodation needs. This justification is supported by a comprehensive planning statement in addition to a commissioned commentary report from Jackman Education Solutions Limited (hereafter referred to as the Jackman report), and an additional explanation of the figures in the form of an annotated chart. The following sections will respond to existing and future student accommodation needs in turn.

Existing need

6.1.24 The applicant has queried the conclusions of the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) which states that there is no need for additional student accommodation, as the growth in student numbers is simply expected to return the University to historic highs. This was discussed at length during the Local Plan examination, where the Council recognised that there is more up-to-date information available which calls into doubt the conclusion that there is no additional need at all. As agreed in the Statement of Common Ground produced after the examination hearings, Local Plan paragraph 4.4.96 is to be amended to reflect this and states the following:

“More recent evidence from the University indicates that this growth, underpinned by changes to the tuition fee system and the removal of student number controls, has indeed generated a need for new accommodation. In 2016/17, 74% of students were from outside the South East, and 28% were from outside the UK, and these groups are particularly reliant on student accommodation. There is current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation.”

6.1.25 As a starting point, the LPA's view as expressed at the examination and the advice of Officers in considering this current application, is that existing need is not therefore primarily based on the SHMA. The primary basis for the applicant's calculation of existing need comes from the University of Reading Accommodation Strategy Gap Analysis (referred to as URAS in the Local Plan examination Statement of Common Ground) submitted by the UoR at the examination, and in particular relates to a figure of 5,015 students taken from p48 of the URAS. The applicant's Planning Statement considers that this represents *“the number of students who registered interest in University Halls of Residence, that could not be offered accommodation”* for the 17/18 academic year” (paragraph 6.25).

6.1.26 The additional explanation provided by the applicant in correspondence dated 4th April 2019 reiterates this, asserting that that the circa. 5,000 figure represents those students who wanted to be in PBSA. The information contained within the Jackman report identifies a figure of 4,797 students who require some form of accommodation (i.e. are not living at home or commuting) but who cannot be housed in PBSA, but, unlike the other information from the applicant, the Jackman report does not state that this demand constitutes a preference from students to be housed within PBSA.

6.1.27 The LPA's understanding of the circa. 5,000 figure has always been (established at examination) that this represented the overall number of students in all years requiring accommodation but not housed in PBSA. Importantly, this figure did not

carry any implication of preference. Furthermore, it did not necessarily mean that 5,000 students would move into a PBSA if such accommodation was hypothetically made available. This has recently been confirmed through direct contact with the UoR (dated 23/04/19), who stated:

“As indicated above, the figure used by Cushman and Wakefield [the 5,015 figure] confirms the proportion of students which require accommodation in Reading but which are unable to be accommodated by the University in PBSA. It does not provide detail of preference of such students. Importantly though the point is not about personal choice, but the fact that this does represent the number of students arriving and in need of accommodation of some form, but cannot be housed by the University.”

- 6.1.28 On further enquiries, the UoR confirmed on 21/05/19 that they do not have any further figures around preference other than where the ‘first year guarantee’ applies e.g. a guarantee to house first year students in PBSA upon enrolment. The first year guarantee leads to a need for 1,000 bedspaces, which the Council has accepted in the proposed Main Modifications to the plan.
- 6.1.29 Therefore, officer advice is that the starting point that, ‘there is a need for 5,000 students to be accommodated in PBSA’ is fundamentally flawed, because there is no evidence that students do not necessarily all wish to be accommodated in PBSA at all.
- 6.1.30 Further to this, Officers can confirm that when the Council in the Statement of Common Ground states that it has, *“no particular reason to doubt the general scale of existing shortfall identified”* as quoted in paragraph 6.28 of the applicant’s Planning Statement, this was specifically made in relation to the approximately 1,000 students shortfall referred to as unable to be accommodated under the first year guarantee scheme; not the larger figure of circa. 5,000 students. To reiterate, paragraph 6.30 of the applicant’s Planning Statement refers to the shortfall that the Council has accepted in the Statement of Common Ground, but this is the 1,000 figure. In summary, Officers do not agree that it has been clearly demonstrated that the figure of 5,000 students represents the level of existing ‘need’.

Future need

- 6.1.31 The applicant’s planning statement relies heavily on the UoR’s own expectations of a growth in student numbers to 21,000 students in 2028, which was presented at the Local Plan examination. The LPA had very serious concerns about these estimates as Officers highlighted at the time during the examination hearings, which are also articulated in Appendix 2a of the Statement of Common Ground. Whilst there is little benefit in restating these points within this committee report in detail, your Officers maintain the view that these growth figures are untested and hugely ambitious, and would have very significant implications for the town, and consequently should not be considered to be a justified basis for future planning. The advice within the Jackman report supports the general direction of travel in expecting the UoR to grow, but in fairly general terms. Even if the assumptions that underpin this level of growth are accurate, such growth would require a significant amount of University expansion, which, according to the Local Plan, would in turn need to be considered against whether it could be supported by appropriate levels of student accommodation.

Need Summary

- 6.1.32 On the basis of the discussion above, Officers are of the view that the shortfall of 1,000 bedspaces to meet the first year guarantee, is at present, the closest thing the Council has to an evidenced level of need, and further, that there are opportunities to accommodate this level of need on locations compliant with Policy H12. The Campus Capacity Study prepared by the UoR to support the examination identifies potential for 1,935 student bedspaces on site, and, whilst the LPA's view as set out in an appendix to the Statement of Common Ground is that this overestimates capacity by around 500 bedspaces, this is still adequate to meet the identified need. The information submitted to support this planning application therefore falls short of the requirement to clearly demonstrate a need that cannot be met in sequentially-preferable locations, as required by emerging Policy H12.
- 6.1.33 The applicant references the recent dismissal of the St Patrick's Hall appeal. Members will be aware that the St. Patrick's Hall site remains an identified Local Plan site allocation specifically for student accommodation (Ref. ER1e). Given the University's identification of an existing shortfall, the UoR can be expected to bring forward a revised proposal for this site, so the site's ability to continue to contribute to the expected supply of student accommodation over the plan period (albeit in line with the allocation rather than the quantum proposed via that application) must be recognised. Officers note the comments of the appeal Inspector, specifically the need for additional student accommodation and the associated benefits that such accommodation would bring, which the Council has recognised itself in the level of need identified in the emerging Local Plan.

Equivalence

- 6.1.34 Through the examination process, Officers have also expressed concern about the degree to which off-campus private PBSA is genuinely able to offer accommodation that meets the actual needs in which the UoR have identified. The accommodation that has been delivered in the Borough so far tends to be priced at a level which does not offer a genuine alternative to many of the students currently residing in HMOs, and therefore it has been argued this does less to free up those HMOs for family housing as claimed within this application. As the URAS itself recognises on page 36, the rents for the various private PBSA schemes in Reading (mainly in Reading town centre) are between £185 and £296 per week, which reflects the fact that this is high-specification accommodation, usually featuring self-contained units with their own en-suite shower-room and kitchen facilities (as proposed), and it is out of the price range of the average student. The UoR therefore considers that much of the private PBSA development that has been delivered so far, whilst widening choice, is not affordable to many of their students in need of accommodation, and that a partnership arrangement may help to resolve the issue. This issue is why the following sentence was agreed in the Statement of Common Ground, to be added to Local Plan paragraph 4.4.95.

“The Council particularly recognises the benefits of purpose-built student accommodation where there is a partnership arrangement with a further or higher education institution and where it offers accommodation that meets the needs of students in terms of facilities, convenience to places of study and in terms of the cost of accommodation.”

- 6.1.35 Little information has been submitted alongside the planning application to deal with issues such as management and rental levels, and whether there will be any arrangement in place with the UoR.

6.1.36 The Jackman report suggests rental levels of £170 per week for the proposed accommodation, although no further detail is provided and this is unlikely to be capable of being secured by the LPA through a planning consent. Whilst higher than most UoR PBSA rents, it is nevertheless lower than other private PBSA providers, perhaps reflecting the format of the accommodation with a significant number of cluster flats rather than entirely studio accommodation. It would therefore be reasonable to assume that this proposal is more likely to free up existing HMOs for general housing needs than other comparable private developments which contain higher rents. However, this would cause harm, by limiting the Council's ability to address the significant need for affordable housing in the Borough, and would not materially translate to meeting a clearly demonstrated need for student accommodation, which is one of the key reasons for the inclusion of such a policy in the first place. It is therefore your officer's view that the proposal does not comply with Policy H12

6.2 Demolition, scale, appearance, design and effect on heritage assets

6.2.1 As established under application 162057, the existing building is not considered to be of any particular special architectural merit to warrant its retention in its own right. Accordingly, its demolition is considered to be appropriate, subject to the proposed replacement building being suitable in design and related terms.

6.2.2 In terms of the proposed building, the footprint closely follows that of the existing building, and approved replacement building, with the 'L' shaped perimeter block aligning with the junction of Kings Road and Rupert Street. In terms of the King's Road frontage, it remains the case that the front building line needs to be respected. Accordingly, although the frontage deviates slightly to the existing, it is nevertheless considered to generally align with the plot frontage and that of immediately neighbouring buildings. Elsewhere the footprint of the building follows that of the existing building, with small divergences (both within and outside the current footprint) at various points. Given the context of the footprint of the existing building, the proposed footprint is also considered appropriate.

6.2.3 Turning to consider the scale of development proposed, on the primary Kings Road frontage the height of the building, whilst slightly taller, remains visually comparable with both the adjacent Pinnacle and Crossway Point buildings. These buildings rise to seven storeys at their highest points with the eastern element on the corner of Rupert Street/Kings Road being the tallest part of the new building. Whilst taller than the building approved under application 162057, the scale of the new building is still considered to respond appropriately to the local context. More specifically, the closest element of the scheme to Crossway Point is set at 5 storeys on the boundary responding to the three-storey, set back element of this building. As such, the scale at this point continues to increase away from the boundary. The highest part of the building as described, accommodating plant, is also set back slightly from subsequent floors, in order to differentiate and reduce the overall mass. The tallest part would not be discernable or visible from street level owing to the setback.

6.2.4 A similar stepped approach is proposed on the Rupert Street elevation, with the proposed height staggered away from the existing neighbouring Saxon Court building from two-storeys (one less than the three-storey Saxon Court) up to seven-storeys towards the junction with Kings Road. It is considered the proposed scale does not over dominate Saxon Court or other nearby buildings on Norwood Road, with the stepped increase in height of the proposed building away from those

properties assisting in this regard. In overall terms, the scale of the proposed building continues to be appropriate in itself and within the context of the prevailing scale of buildings in the local immediate area.

- 6.2.5 In terms of the detailed design, appearance and choice of materials, the façade adopts a regular floor plan repeated over a number of floors defined by a grid. Within the grid, each bay is split into a hierarchy of elements: window, ventilation grille and a contrasting cladding element. The grid is broken on the separating vertical elements that are defined by horizontal cladding with full-height openings forming a break between the cladding and the grid façade. The proposed front entrance is identified by a highly-glazed façade and approach features like steps and landscaping, as well as the fact it is prominently located facing onto Kings Road and towards the corner of the site. Along with the building's overall height and presence, the principal corner elevation, complete with contrasting cladding and increased glazing, successfully addresses the junction and effectively signals the main entrance and creates a sense of place.
- 6.2.6 The primary material proposed is stretcher bond red brickwork, with a combination of zinc cladding and aluminium louvers. This signifies a greater departure from the design of both the adjoining buildings and approved application 162057, which display greater use of less traditional materials. The finished appearance evidently takes cues from more traditional and good quality historic buildings in the immediate area that use brick to a greater or lesser extent. The proposed building acknowledges these buildings and offers a contemporary interpretation, of what is recognised as improved quality than certain buildings which exist along King's Road and, in itself, is considered appropriate in design terms.
- 6.2.7 In terms of the effect of the proposals on the nearby heritage assets, it is considered that the proposals would result in no material harm to the setting of any nearby listed building, nor the listed park and garden. In this regard Officers concur with the evidence and conclusions stated at Section 5 of the Heritage Desk-Based Assessment (November 2018) prepared by Orion and submitted as part of the application.
- 6.2.8 In overall terms it is therefore considered that the design approach is suitable (subject to submission of details) and appropriate in context, both in itself and also to the site's prominent location along the Kings Road.

6.3 Residential amenity

Quality of accommodation for future occupiers

- 6.3.1 The internal layout of the units reflects the specific use of the building for PBSA. The submitted daylight/sunlight study concludes that within the proposed accommodation, every habitable room at each level would fully satisfy BRE criteria. It is considered that the proposed student bedrooms would receive an appropriate amount of daylight for the nature of the accommodation proposed. This is on the basis that it is reasonable to expect that occupiers would not spend substantial or prolonged periods of the day within these rooms and they exist as part of a wider student accommodation provision. A shared kitchen, living and dining room is proposed for each cluster of rooms. Additional amenity areas exist within the wider site, including the outside spaces and communal facilities on the ground and basement floor. It is also reasonable to expect that occupiers would spend significant periods of time elsewhere on the University's estate. Therefore, the small room sizes (typically 11.5 sq.m.) are accepted for such a PBSA development.

Overall the quality of accommodation is considered appropriate for its intended use, in accordance with Policy DM4. Officers recognise that such provision would not be appropriate for C3 Class dwellings, a such a restriction on the use of the accommodation to 'student occupiers only' would be a requirement through a S106 agreement should the application be approved.

- 6.3.2 In addition to the above, the Crime Prevention Design Advisor (CPDA) is largely satisfied with the proposals subject to conditions recommended as per Section 4 above, with conditions also considered to be necessary in relation to cycle storage / waste management (see Section 4).
- 6.3.3 Overlooking between different student bedrooms within the development will be possible due to the 'L' shaped layout of the proposed building with a short wing extending south towards King's Road. This results in a small number of rooms on each level potentially looking inwards towards other centrally-located rooms. A number of façade design measures have been employed to eliminate and/or reduce overlooking between spaces to acceptable levels. Semi-transparent film / etching are proposed to the inner face of the glazing along with vertical fins extending around 450mm beyond the window mullion to control and limit the direction / extent of views between rooms. Full details of such measures could be controlled by a planning condition and is considered to satisfactorily minimise harmful instances of overlooking between units.

Amenity of nearby occupiers

- 6.3.4 The provision of any taller replacement building, within the context of existing neighbouring and nearby residential buildings, has the potential to cause a loss of amenity to existing occupiers. As such, this element of the proposals has been carefully considered in the context of Policy DM4.
- 6.3.5 Considering first the impact on Crossway Point to the east, the west side elevation of this existing building is a blank façade, meaning there are no adverse amenity impacts at this point. Furthermore, the footprint of the proposed building is such that at the nearest point to Crossway Point, the proposal will not extend beyond the front or rear building lines of the neighbouring building. This minimises any possible privacy/overlooking/visual dominance concerns. It is however acknowledged that the rear (east) elevation of the proposed accommodation fronting onto Rupert Street includes units which will look across at Crossway Point. The distance to the boundary is 13.3m, beyond which is a shared amenity space and the north-facing rear elevation of Crossway Point. In light of this context, in particular the oblique angle at which overlooking between habitable rooms would occur, the loss of amenity to existing Crossway Point occupiers would not be significant. In terms of daylight, sunlight and overshadowing, the submitted assessment undertaken by the applicant demonstrates that there would be no significant harmful impact on Crossway Point as a result of the development.
- 6.3.6 With regard to the impact on The Pinnacle, to the west of the application site, it is noted that that whilst privacy and day/sunlight concerns were not raised during the public consultation period, this requires careful consideration. In terms of overlooking/privacy issues, there would be a minimum of 17m distance between the buildings at the King's Road / Rupert Street junction. Although this is acknowledged to be below the 20m back to back distance specified by SDPD Policy DM4, given the existing context and the separation of the Rupert Street highway, in this instance and based on the site specific circumstances, student accommodation could be provided without any significant detrimental effect on privacy. This is

similarly considered to be the case in terms of visual dominance/overbearing impacts. Although the height of the building will increase compared with existing, and be marginally greater than the approved building under application 162057, the proposed height remains comparable with The Pinnacle. Therefore, although levels of outlook will be similarly reduced by the proposed scale as to the approved scheme, officers advise that this remains at a level of intrusion which would not warrant a sustainable reason for refusal.

- 6.3.7 In considering the impact on daylight/sunlight of The Pinnacle occupiers, it remains the case that the majority of windows on the east elevation of this building continue to meet the BRE criteria guidance (54%). Of the 46% which fail, 35% do so by a marginal amount.
- 6.3.8 In comparing the proposed development and the approved development under permission 162057, it must be recognised that there is now a greater number of rooms on the east elevation of The Pinnacle which will experience a loss of daylight/sunlight as a result of the development. This broadly equates to a 15% like-for-like reduction in the number of rooms meeting the BRE criteria guidance. However, it must also be recognised that the assessments were undertaken by different consultants, assessed architecturally different (but similarly scaled) buildings and contain their own assumptions. Therefore, any degree of confidence in both sets of conclusions is likely to reflect this.
- 6.3.9 The windows affected on the east elevation of The Pinnacle continue to serve a range of rooms, of which some contain recessed balconies whilst others are dual aspect. Similar to the daylight/sunlight assessment undertaken for application 162057, the overall number of rooms affected by the scheme remains small in comparison with the overall number included within the context of the study as a whole.
- 6.3.10 In calculating the level of harm, the BRE guidelines advise that where there is a decrease in daylight or sunlight and such rooms fail to meet the guidelines, factors such as whether a small number of windows or limited area is affected, whether the loss of light is only just outside the guidelines, and/or whether an affected room has other sources of light, must be taken into account. In this regard the development is deemed to have a 'Minor Adverse' impact on the amenity of neighbouring residents.
- 6.3.11 Finally, it remains the case that the BRE Report is not a test to determine whether a development "Passes" or "Fails", but rather "A Guide to Good Practice". Like approved application 162057, the failure of a slighter greater number of windows on the east elevation of The Pinnacle does not categorically indicate that the development is unsuitable and that the planning permission should be refused.
- 6.3.12 With this in mind, the overall improvement in the building's design together with extant planning history, the increased loss of light to those specific rooms on the east elevation of The Pinnacle is not considered substantial enough to warrant a stand-alone refusal reason.
- 6.3.13 With regard to other nearby buildings to the north and south of the site, no significantly harmful amenity impacts are envisaged at these points. In terms of Saxon Court to the north, the south elevation (on the northern boundary of the application site) is the side elevation of this building and windows do not serve habitable rooms. Consequently, the overbearing / overlooking impacts of the

proposed building would not be significantly harmful. To the south, the width of Kings Road prevents any potentially harmful amenity impacts to buildings opposite.

6.3.14 In respect of other amenity impacts which could have a negative impact on any of the nearby occupiers specified above, such as noise and disturbance, lighting, dust/fumes/smells and crime and safety, the transport, environmental protection, CPDA and quality of accommodation of this report confirms these elements are satisfactory, subject to conditions. Accordingly, in overall terms and on balance, the proposals are considered to sufficiently safeguard amenity in accordance with Policy DM4.

6.4 Transport

6.4.1 In line with section 4 of this report, the proposals are considered to be satisfactory from a transport perspective, subject to a number of conditions. In particular, it is noted that proposed PBSA accommodation will not increase traffic in the vicinity of the site to a worse extent than the lawful office use, which is recognised to generate significantly more peak hour vehicular trips than the proposed PBSA use. The same applied to the extant residential permission in which would generate a greater demand for private vehicle use than PBSA. Accordingly, no conflicts are advised with the transport policies above.

6.5 Trees, landscaping and ecology

6.5.1 As per section 4 above, the Council's Natural Environment Officer is content that the landscaping layout shown is the maximum achievable within the constraints of the proposed scheme. Accordingly, the proposals are considered appropriate from this perspective subject to conditions.

6.5.2 The Council's Ecology Consultant is satisfied with the information submitted in this regard, subject to a conditions covering landscaping, drainage and biodiversity enhancements being secured.

6.6 Sustainability, energy and drainage

6.6.1 Information pertaining to sustainability, construction methods to be employed (and materials) are detailed within the submitted Design and Access Statement, Sustainability Report, Energy Report and BREEAM pre-assessment. It has been stated that the whole development would be designed to meet a minimum BREEAM 'Excellent' rating and any approval would be conditioned as such.

6.6.2 The level and nature of information submitted is commensurate for a development of this nature, in line with Policies CS1 and DM1 of the adopted development Plan and policies CC2 and CC3 of the Emerging Local Plan. It is however considered necessary, as is required for all new build dwellings associated with major developments (such as this), for a condition to be included to secure further details. More specifically, this will seek the pre-occupation submission of written evidence demonstrating that Part L of Building Regulations (2013) are met with regard to the requirement to improve emissions rating for the new development. With this condition secured it is considered that the proposals comply with the sustainability elements of those relevant policies CS1 and DM1.

6.6.3 The applicant has also submitted an Energy Strategy with a variety of energy demand reducing and energy efficiencies referenced, and which again follows the SPD guidance. Sections of the submitted document discuss Part L of the Building

Regulations referenced above and confirm compliance. It is considered in overall terms that the proposal has satisfactorily demonstrated that the proposals accord with the principles of Policies CS1, DM1 and DM2 of the adopted local plan and CC2 and CC3 of the Emerging Local plan. In order to ensure that the measures stipulated within the Energy Strategy are implemented, a condition would be necessary specifying this.

- 6.6.4 In terms of flood risk and drainage, a Flood Risk Assessment (FRA) has been produced for the Site and included within the application. The FRA identifies that as the Site is located within Flood Zone 1; it has little or no risk of fluvial flooding and is therefore the sequential and exception test not applicable.
- 6.6.5 With discharge of surface water, the submitted report confirms that discharge to the Thames Water surface water sewer in Norwood Road is the only feasible option for surface water drainage. This option has been queried by Thames Water in correspondence made available by the applicant. Thames Water makes clear that in accordance with the Building Act 2000, positive connection to a public sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being: 1st Soakaways; 2nd Watercourses; 3rd Sewers. Only when it can be proven that soakage into the ground or a connection into an adjacent watercourse is not possible would we consider a restricted discharge into the public surface water sewer network. This is an engineering matter.
- 6.6.6 The submitted information does not explain in any detail why it is not practicable on the site to restrict run-off to greenfield rates as part of the planning application. In considering surface water, previous approved application 162057 incorporated below ground attenuation which was deemed acceptable subject to a condition stipulating these features to be implemented prior to first occupation and maintained accordingly thereafter.
- 6.6.7 In the interest of supporting the uses of sustainable drainage on such sites and with due regard to previously agreed attenuation measures, the Local Authority as Lead Local Flood Authority would consider it necessary to attach a detailed drainage condition as part of any permission. This would seek to demonstrate the surface water hierarchy has been considered and implemented in accordance. The proposed development would therefore comply with the requirements of Core Strategy Policy CS34, emerging Local Plan Policy EN16 and the requirements of the NPPF.

6.7 Other matters

Archaeology

- 6.7.1 As per the consultation response from Berkshire Archaeology (see section 4) above), a pre-commencement condition requiring a written scheme of archaeological investigation is necessary in this instance in order to comply with Policy CS33.

Section 106 and Affordable Housing

- 6.7.2 The proposal is classified as a Major development. As such the requirements of the Employment Skills and Training SPD (2013) apply. Whilst an actual plan is encouraged, the SPD does allow for financial contributions to be made in lieu of a plan. The proposed S106 allows for either eventuality. Using the formulae on pages 11 and 12 of the SPD:

Construction Phase:

Using the gross floor space to be constructed the contribution would be: £2,500 x 5014m² / 1000m² = **£12,535**

End User Phase:

- 6.7.3 The site will employ staff in security and other supporting functions. The submitted application forms confirm the site would employ a Full Time Equivalent of 4 staff. This equates to an 'employment density' of 1252m² per member of staff.
- 6.7.4 The employment density figures will be used in the following formula (See page 12 of the SPD):

Floor area proposed (net) (3589m²) / employment density (1252) x 0.5 (target percentage of jobs for Reading residents x 0.30 (percentage without level 2 skills x £1,500 (average cost of training)) = **£644.98**

- 6.7.5 The written plan, or alternative payment in lieu, is to be secured by S106 agreement to be provided one month prior to commencement to allow training and recruitment to be arranged. As the End User Phase for this site would be £644.98, it is not considered reasonable to secure such low amount through the legal mechanism available. Failure to secure a construction phase Employment Skills and Training contribution by determination would however constitute a stand-alone reason for refusal.
- 6.7.6 With regard to affordable housing, the Council's Housing Strategy (2009-2013) refers to achieving a target of 40% of all new homes in the town to be affordable. Core Strategy Policy CS16 seeks a target 50% provision on sites of 15 units and above to help to meet locally identified needs. The policy will not be applied to student accommodation unless this is being developed on an allocated housing site or a site where residential development would have been anticipated. In this case the site is specifically allocated for residential use within the Emerging Local Plan under Policy ER1g (26-38 dwellings). This would also constitute a reason for refusal if not secured prior to determination. However, it should be noted for the avoidance of doubt that were a suitable contribution towards affordable housing to be secured, this would not negate the LPA concerns for housing need as identified in section 6.1, which would continue to apply.

Community Infrastructure Levy (CIL)

- 6.7.6 The applicant has completed a CIL liability form as part of the submission of this application. As was apparent from the Officer site visit in February 2019 that the building was vacant, however partially occupied as of the previous officer site visit in December 2016 and therefore the existing floor space will be able to be deducted from the CIL liability (providing the building was occupied for 6 of the previous 36 months at the time of the permission). On this basis, the CIL liability (using the 2019 indexation) would only be paid if the application was approved.

Equality

- 6.7.7 In determining this application the Council 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. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

7. CONCLUSION

- 7.1 Based on an the assessment of the proposal as set out in the report above, it has not been clearly demonstrated how this proposal for PBSA meets an identified existing or future need which cannot already be met through those identified sites within the Emerging Local Plan allocated for student accommodation or on those sequentially preferable sites. As identified in Section 6.1, the Alexander House site is a specifically allocated housing site (Policy ER1g) within the Emerging Local Plan, and is an important component part of allowing the Borough to meet its identified housing need over the plan period. The loss of this site to an alternative use has not been justified and without adequate equivalence in housing provision being provided, it would further reduce the Council's ability to meet its housing needs within its own boundaries. The proposal is therefore contrary to Policy H12 and ER1g of the emerging Local Plan and conflicts with the aims of the NPPF.
- 7.2 Officers recognise the merits of the current design, the inherent sustainability measures of the development and compliance with Council's technical standards for environmental protection and transport/highways. Whilst there is in an identified worsening in the level of daylight/sunlight for adjoining occupiers (Section 6.3.4), officers do not consider this a sufficient refusal reason in itself. However, the inability to complete the necessary s106 agreement, due to the application not being supported by your officers and the details not having been agreed, would form further reasons for refusal.
- 7.3 Therefore in summary, when considering all material considerations raised, the benefits of this PBSA scheme or the building itself are not considered sufficient to outweigh the harm cause in preventing the Borough meeting its overall housing needs through the inherent conflict with emerging Local Plan policies and the aims of the NPPF. As such, this application is recommended for refusal.

Drawings submitted:

01 – Location Plan		
Location Plan	1:1250@A3	A-01-001
02 - Site Plans		
Existing Site Plan	1:500@A3	A-02-001
Existing Topographic Survey Plan	1:100@A0	A-02-002
Proposed Site Plan	1:500@A3	A-02-100
Proposed Landscape	1:200@A1	L-90-100
03 – Floor Plans		
Existing Basement & Ground Floors	1:100@A1	A-03-001
Existing First Floor & Roof Plan	1:100@A1	A-03-002
Proposed Lower Ground Floor	1:100@A1	A-03-099
Proposed Ground Floor	1:100@A1	A-03-100
Proposed First Floor	1:100@A1	A-03-101
Proposed Second Floor	1:100@A1	A-03-102
Proposed Third Floor	1:100@A1	A-03-103
Proposed Fourth Floor	1:100@A1	A-03-104
Proposed Fifth Floor	1:100@A1	A-03-105
Proposed Sixth Floor	1:100@A1	A-03-106
Proposed Seventh Floor (Plant)	1:100@A1	A-03-107
Proposed Roof Plan	1:100@A1	A-03-108
04 - Sections		
Existing Section 1	1:100@A1	A-04-001
Proposed Section AA	1:100@A1	A-04-100
Proposed Section BB	1:100@A1	A-04-101
Proposed Section CC	1:100@A1	A-04-102
Proposed Section DD	1:100@A1	A-04-103
05 - Elevations		
Existing Elevations 1 & 2	1:100@A1	A-05-001
Existing Elevations 3 & 4	1:100@A1	A-05-002
Existing Elevations 5 & 6	1:100@A1	A-05-003
Existing Contextual Elevations 7 - 9	1:100@A1	A-05-004
Proposed South Elevation	1:100@A1	A-05-100
Proposed West Elevation	1:100@A1	A-05-101
Proposed North Elevation	1:100@A1	A-05-102
Proposed East Elevation	1:100@A1	A-05-103
Proposed Street Scene - King's Road	1:200@A1	A-05-104
Proposed Street Scene - Rupert Street	1:200@A1	A-05-105
Proposed Context Elevation - North	1:200@A1	A-05-106
Proposed Context Elevation - East	1:200@A1	A-05-107
Proposed Bay Study - Main Entrance	1:50@A1	A-05-108
Proposed Bay Study - Typical	1:50@A1	A-05-109
Proposed Bay Study - Central Studios (S)	1:50@A1	A-05-110
Proposed Bay Study - Central Studios	1:50@A1	A-05-111
06- Other		
External Lighting Lux Plot	1:100@A1	4479-EX-00-DR-E-200
External CCTV Layout	1:200@A1	4512-EX-00-DR-E-500

Case Officer: Brian Conlon

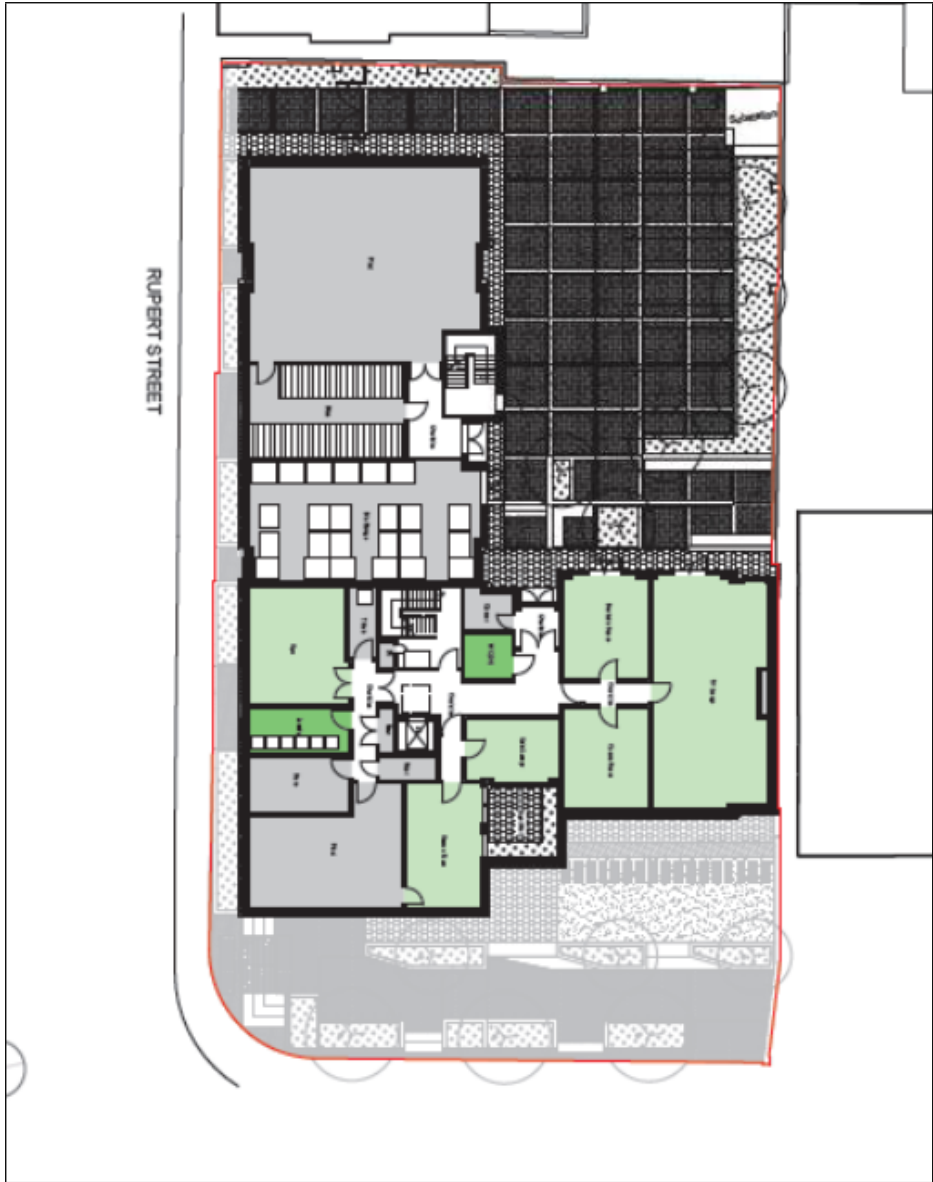
8. Photos and plans extracts



Aerial view looking east towards Cemetary Junction



Existing Kings Road and Rupert Street elevations



Proposed Ground Floor Plan (Not to scale)



First and second floor plan (Not to scale)



Proposed visualisation of the building and Kings Road/Rupert Street streetscene



Proposed visualisation of the building and Kings Road elevation



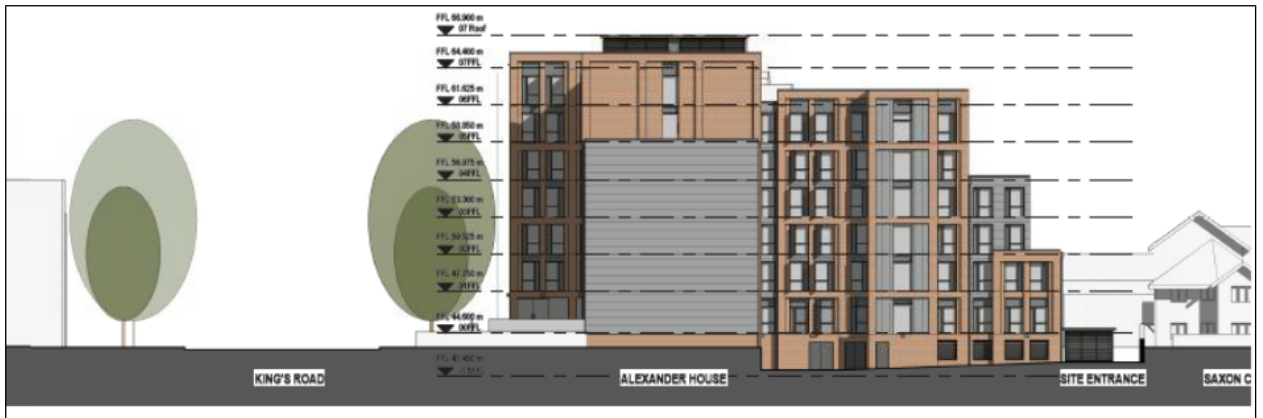
Kings Road elevation



Rupert Street elevation



Proposed north (rear) elevation



Proposed east (side) elevation and section



Comparison between approved Kings Road elevation 162057 (top) and proposed Kings Road elevation (bottom) (Not to scale)