

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 4 SEPTEMBER 2019

Ward: Katesgrove

App No.: 190449/FUL

Address: 40-68 Silver Street

Proposal: Erection of part 1, part 2 and part 4 storey (plus basement level) buildings to provide 79 student studio rooms (sui generis use class) with associated ancillary space and landscaping works.

Applicant: Silver Street Developments Ltd

Date validated: 19th March 2019

Major Application: 13 week target decision: 18th June 2019

26 week Planning Guarantee: 17th September 2019

RECOMMENDATION

REFUSE Full Planning Permission for the following reasons:

1. The proposed development, due to the combination of the bulk and height of Block A, the spacing between Block A and B, and the dominating design including development on three sides of the plot, would result in the site appearing over developed and a harmful addition to the streetscene, of detriment to the character and appearance of the area. As such the proposal is contrary to Policy CS7 of the Reading Borough LDF Core Strategy and para. 17 of the NPPF.
2. The proposed development, due to the height, position and bulk (of Block A in particular), will result in the loss of amenity for neighbouring residents through overlooking, loss of privacy, loss of light and noise and disturbance arising from the use of this small site to accommodate 79 students. As such the proposal is contrary to Policy DM4 of the Reading Borough Sites and Detailed Policies Document.
3. The proposed development, due to the relationship between the Blocks and the overall layout and movement through the site, will result in detriment to the amenity of proposed residents in terms of how they would experience the external courtyard space and internal space through overlooking, loss of privacy and noise and disturbance. As such the proposal is contrary to Policy DM4 of the Reading Borough Sites and Detailed Policies Document.
4. The proposed development would lead to a concentration of student accommodation in this area that would detrimentally impact on the lives of adjoining occupiers and would fail to provide a mixed and balanced community contrary to the aims of Policy CS15, NPPF para.50 and emerging Policy H12.
5. It has not been clearly demonstrated how this proposal for Purpose Built Student Accommodation (PBSA) demonstrates 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. Its loss to student accommodation would further reduce the Council's ability to meet its housing need within its own boundaries. The proposal therefore does not comply with Policy H12 of the Emerging Local Plan and conflicts with the aims of the NPPF.

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

INFORMATIVES TO INCLUDE

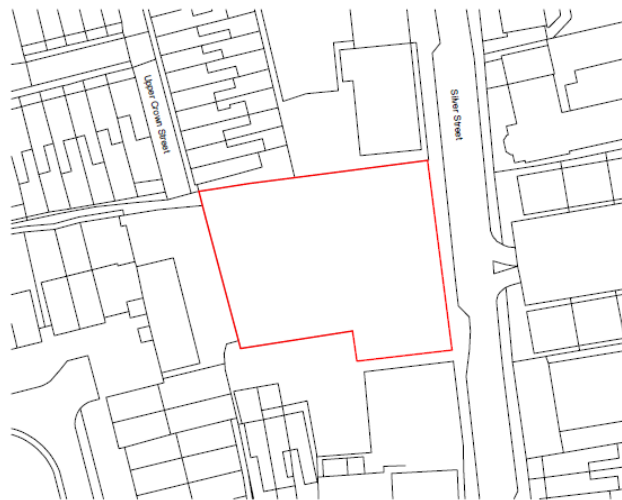
1. IF1 Positive and Proactive Working - refusal
2. Refused plans

1.0 INTRODUCTION

- 1.1 The application site is on the western side of Silver Street. The site was previously occupied by two buildings, now demolished. At 40 Silver Street this was a tall single storey commercial building of 610m² with 3 no. pitched roofs, the former HSS light industrial warehouse. This had been vacant for a number of years and largely filled the site. At 62-68 Silver Street was a further 2 storey I-shaped building formerly in commercial use, also vacant for a number of years, which was granted permission in 2012 for 16 student flats (now lapsed - 110915).
- 1.2 The plot is ca. 36m wide to the frontage, and at its deepest 41.2m. Former 62-68 Silver Street was ca 18.2m deep, and creates an-I-shape to the plot, with the gardens serving Hawk Cottages, located immediately to the rear and side of the application site.
- 1.3 To the west of the site is Rimaud House, which is a 3 no. storey residential block at an elevated position approximately 2m higher than the application site. At the north-west, the site immediately adjoins no 69 Upper Crown Street, indeed part of the northern flank wall of the former commercial building formed part of the southern boundary of that property. Immediately to the north is a flatted scheme called Platinum Apartments which is 2.5 storeys with a third floor of accommodation in the roof, which has private amenity space and parking to the rear (west).

- 1.4 Former 40 Silver Street was set back from the highway edge by just over 7m in contrast to surrounding buildings, which are set much closer to the highway edge.
- 1.5 Formerly the vehicular access to the site was from Silver Street via two dropped kerbs at either end of the site's frontage. Pedestrian access is also via the site's frontage on Silver Street. There is existing parking to the front (7 no. spaces) and a layby by the road. Silver Street is a one way street, with vehicles passing in a north to south direction.
- 1.6 The area is predominantly residential with a mix of traditional terraces and semis, but there are some commercial premises in the area. There is no one single prevailing architectural style which characterises the area, but the majority of the buildings are traditional brick and tile construction. There are a range of different building styles, heights, ages of property and materials, with large scale modern flat blocks located north of the site towards the town centre, and around the site 3-4 storey flats, 2-3 storey courtyard offices (Windsor Square) and to the south 2-3 storey Victorian terraces.
- 1.7 Opposite the site a recently permitted student scheme for 60 units is under construction and will be of a modern appearance.
- 1.8 The site lies within an area that has less than 10% tree canopy cover as identified within the Council's adopted Tree Strategy and within an Air Quality Management Area (AQMA) (Policy DM19) and area of Archaeological Potential as identified within the Council's Sites and Detailed Policies Proposals Map.

Location plan not to scale



2.0 PROPOSAL

- 2.1 Full Planning Permission is sought for the erection of part 1, part 2 and part 4 storey (plus basement level) buildings to provide 79 student studio rooms (sui generis use) with associated ancillary space and landscaping works. This follows the refusal of a scheme at 40 Silver Street for 62 student studios and the subsequent purchase of the adjoining site 62-68 Silver Street.

- 2.2 The scheme would create an 'N' shaped development with two main wings (Blocks A & B) running roughly parallel to each other between 15.1 metres and 12.2 metres apart, with the taller Block A at on the Silver Street frontage. The two wings would be connected by a single storey block with basement and ground floor level links on the northern boundary of the site.
- 2.3 The proposed external surfaces are shown to be fair faced brick, brick sills, standing seam zinc roof and aluminium window frames.

Community Infrastructure Levy

- 2.4 The development would be liable for the Community Infrastructure Levy, and if permission were to be granted a CIL of total floor space is £363,040 (based on original submission of 2449sqm) would be charged to the total floor area of the proposed building.
- 2.5 The following plans and supporting documents have been assessed:

Received 19th March 2019 (unless otherwise stated):

- Existing Location Plan - Drawing no: PL_003
- Existing Site Plan - Drawing no: 10_005
- Proposed Site Plan - Drawing no: PL_004
- Lower Ground Floor Plan - Drawing no: PL_200
- Ground Floor Plan - Drawing no: PL_201
- 1st Floor Plan - Drawing no: PL_202
- 2nd Floor Plan - Drawing no: PL_203
- 3rd Floor Plan - Drawing no: PL_204
- Roof Plan - Drawing no: PL_205
- Elevations Sheet 1 - Drawing no: PL_206
- Elevations Sheet 2 - Drawing no: PL_207
- Elevations Sheet 3 - Drawing no: PL_208
- Elevations Sheet 4 - Drawing no: PL_209
- Section [A] - Drawing no: PL_212
- Block B Section - Drawing: PL_214
- Landscape Layout - Drawing no: 102 Rev B
- Solar Study - Drawing no: PL_210
- Street Elevation - Silver Street - Drawing no: PL_213

Other Documents:

- Area Schedules - PL_216
- Daylight and Sunlight Study, dated February 2019, prepared by Delva Palman Redler
- Design and Access Statement, Version 1.6 dated March 2019, prepared by OEA
- Drainage Strategy, doc ref: 1227-002-003, dated 26th February 2019, prepared by Westlakes Engineering
- Purpose Built Student Accommodation Management Plan, dated March 2019, prepared by Morlet Properties Ltd
- Landscape Design Sketchbook, Issue 1 dated February 2019, prepared by TPM Landscape
- Planning & Heritage Statement, dated March 2019, prepared by GW Planning
- Room Schedule - PL_308

- Additional Supporting Statement - Need for Student Housing, prepared by GW Planning, received 14th May 2019

Amended plans as received 1st July 2019 (unless otherwise stated)

- Lower Ground Floor Plan - Drawing no: PL_200 Rev A
- Ground Floor Plan - Drawing no: PL_201 Rev A
- 1st Floor Plan - Drawing no: PL_202 Rev A
- 2nd Floor Plan - Drawing no: PL_203 Rev A
- 3rd Floor Plan - Drawing no: PL_204 Rev A
- Roof Plan - Drawing no: PL_205 Rev A
- Elevations Sheet 1 - Drawing no: PL_206 Rev A
- Elevations Sheet 2 - Drawing no: PL_207 Rev A
- Elevations Sheet 3 - Drawing no: PL_208 Rev A
- Elevations Sheet 4 - Drawing no: PL_209 Rev A
- Section [A] - Drawing no: PL_212 Rev A
- Lower Ground Floor - Landscape Layout - Drawing no: 102 Rev A
- Solar Study - Drawing no: PL_210 Rev A
- Street Elevation - Silver Street - Drawing no: PL_213 Rev A
- Ground Floor Landscape Layout - Drawing no: 103 Rev D

Other Documents:

- Design and Access Statement, Version 1.6 dated May 2019, prepared by OEA, received 24th May 2019
- Room Schedule - PL_308, received 30th May 2019

3.0 PLANNING HISTORY

40 Silver Street

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

162232/PREAPP - Student accommodation comprising 67 studio rooms with ancillary areas. Total floor space 2432m² - Observations sent 20/3/17

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

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

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

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

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

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

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

iii) a travel plan and highway alterations,

iv) a restriction on occupancy to students only, and

v) implementation of the student accommodation management plan;

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

This was appealed - Ref: APP/E0345/W/3199747 - Dismissed 29/10/18

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

182150/PREAPP - Erection of a three storey (plus basement level) building to provide student studio rooms. Approx 1700m2 GEA. Comments from Design Review Panel provided 1/2/19 and other consultee comments 8/3/19

62-68 Silver Street

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

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

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

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

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

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

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

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

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

181150/NMA - Non-Material Amendment to planning consent 180075 for changes to approved plans at -1 level to allow for the merging of 2 studios in to 1 flat and new studio flat in place of sub-station. No additional rooms provided - Agreed 6/8/2018

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

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

4. CONSULTATIONS

(i) Statutory

- 4.1 No statutory consultations were required given the nature of the application.

(ii) Non-statutory

RBC - Ecology

- 4.2 The application site comprises a workshop and commercial building where it is proposed to demolish the buildings and construct 79 student studio rooms *[comments were received prior to the demolition of both buildings]*. A similar application (172118) was previously refused - there had been no ecology-related objections. In addition, an application for prior notification of demolition of 62-68 Silver Street Reading (190242; part of the current application site) did not face any ecology-related objections, provided the timing of the demolition was restricted to ensure that nesting birds (particularly swifts) were not harmed during the works.
- 4.3 The habitats on and surrounding the site are of poor suitability for use by bats or other protected species. However, Silver Street hosts a large population of swifts which nest under the eaves of the houses. Swifts are in decline and are listed as "Amber" on the Birds of Conservation Concern list (<https://www.bto.org/science/monitoring/psob>), in part due to the loss of and lack of nesting sites. As such, and in accordance with paragraph 175 of the NPPF and Policy CS36 of the Core Strategy, opportunities to enhance the site for swifts should be provided.

- 4.4 Overall, subject to the recommended condition (biodiversity enhancements) and informative (re nesting birds - *Planning Officer note: this is no longer relevant as the buildings have now been demolished*) there are no objections to this application on ecological grounds.

Environmental Protection & Nuisance

- 4.5 Noise impact on development: A noise assessment should be submitted in support of applications for new residential proposed in noisy areas. The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.
- 4.6 Where appropriate, the noise assessment data should also include noise events (L_AMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

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

- 4.7 As a noise assessment has not been submitted and the proposed development is by a busy road, I recommend a condition is attached to any consent requiring a noise assessment to be submitted prior to commencement of development and any approved mitigation measures implemented prior to occupation to show that recommended noise levels in the table above can be met. The noise assessment will need to identify the external noise levels impacting on the proposed site.
- 4.8 Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards. Noise assessment condition recommended and an informative re insulation.
- 4.9 Air Quality - Increased exposure - The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.
- 4.10 The applicant will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.
- 4.11 Where the development involves converting an existing building and allowing a buffer zone is not an option then it may be that other mitigation can be applied. In the first instance this would be to implement measures to

reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

- 4.12 If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.
- 4.13 Mitigation against increased exposure:
- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
 - Buffer zones - consider increasing distance of the building façade from very busy roads
 - Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
 - Mixed use - locate any sensitive uses on higher floors, allowing commercial use on lower elevations
 - Balconies - consider avoiding use in areas of exceedence, especially on ground and first floor level
 - Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants
- 4.14 Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.
- 4.15 Until an [assessment and / or mitigation plan] has been submitted and approved by the Environmental Protection Team it is impossible to determine whether the proposed development is appropriate for the proposed location, therefore until the above has been received I would recommend refusal on air quality grounds or a condition.
- 4.16 Contaminated Land - Where development is proposed, the developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.
- 4.17 The development lies on the site of an historic works which has the potential to have caused contaminated land and the proposed development is a sensitive land use.
- 4.18 Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.
- 4.19 Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action. Conditions are recommended to ensure that future occupants are not put at undue risk from contamination.
- 4.20 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. Conditions to control noise and dust during construction, hours of work and no bonfires during construction are recommended.

RBC Natural Environment

- 4.21 I note that the scheme proposes street tree planting, i.e. within the RBC highway, as opposed to tree planting within the frontage. As previously advised, including trees within the red line should be the default position but IF they can demonstrate that for whatever reason this is not feasible then a contribution on Council land could be appropriate. I cannot see anything in the submissions to explain why trees could not be accommodated within the site. This is required to demonstrate why this site is a special case in order to separate it from any other development where the applicant might seek off-site planting in order to maximise their footprint.
- 4.22 Assuming an appropriate argument is presented to agree the principle of off-site planting, we would obviously need to check whether planting on the Council pavement is practically possible, i.e. are services (above or below) in the way. It does not appear that parking is proposed hence visibility splays Vs trees would not be a concern.
- 4.23 No decision on the application should be made before it is confirmed whether planting is feasible. Liaison with Highways / Parks will be necessary and investigations made; an in principle 'planting is acceptable subject to services' would not be appropriate in case planting cannot then not be done. IF planting is possible on RBC and land AND it's been accepted that agreeing a contribution for off-site planting is reasonable in this case, then it will be acceptable. Input over the costs to be secured within a \$106 will have to be determined and should incorporate a high specification hard landscape tree pit for each tree. Further advice can be given at a later stage.
- 4.24 Conditions will be required to secure landscaping submission, approval, implementation, maintenance and replacement.
- 4.25 ***Planning Officer note:*** Highways confirmed that there would not be enough space to plant trees within RBC pavement. Further Comments from the applicant were as follows: *"The preference for highway trees in this case are because: 1. To maximise amenity courtyard space within the scheme (response to previous RBC objection re proportions); 2. To provide appropriate building line with respect to buildings either side which are further forward; and 3. To best achieve boulevard appearance in relation to other trees to S on Mount Pleasant"*
- 4.26 The Natural Environment Officer responded:
- 1) Courtyard space will be one for you to decide what is more important, particularly if trees can't be planted in the pavement.
 - 2) Historic building line of No. 40 is set back and we said from the beginning to use this as an advantage to allow for tree planting. Again, I don't know how important it is in planning terms for the new build to

respect the building line of the adjacent properties as opposed to the historic building line of the site.

- 3) Given the sporadic planting down Silver Street and the not insignificant distance between the site and nearest street trees, I don't think that tree planting in the pavement can be argued as visually necessary.

4.27 **Planning Officer note:** Amended plans were submitted by the applicant and further consultation undertaken. Further comments from Natural Environment were as follows:

4.28 With reference to Ground Floor - Landscape Layout 103 D: Whilst the inclusion of trees on the frontage is obviously positive, showing these on a plan is not sufficient alone to determine whether and what is feasible. I think it is important for the applicant to show us how trees can be incorporated by providing information on how sufficient underground rooting environment will be provided, confirming the above ground space (distance between trunk locations and front elevation) and confirming what species they consider could be provided - I note the indication of 'small, ornamental' trees on the frontage, multi-stem in form. It may be more appropriate, given the width available to have single stem (with a clear stem of 2.5m) planted to avoid overhanging issues. Confirmation of the space available would help determine what species could reasonably be planted.

SUDS

4.29 No objection.

RBC Transport

4.30 This application enquiry is for the erection of part 1, part 2 and part 4 storey (plus basement level) buildings to provide 79 student studio rooms (sui generis use class) with associated ancillary space and landscaping works. A similar proposal was considered under application no. 172118 which was refused in February 2018 and dismissed at appeal in October 2018.

4.31 The application site is outside the town centre area but is within close proximity to frequent premier bus routes that run to and from the town centre and Reading University. The site is therefore accessible to good public transport links, town centre services and employment areas.

4.32 The A327 Silver Street is part of the "A" road network carrying between 9,000 and 10,000 vehicles a day. Silver Street has "No Waiting" parking restrictions (DYL) preventing on-street parking and peak hour loading bans between 8.15-9.15am and 4.00-6.15pm.

4.33 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.

- 4.34 It is indicated that the site will be managed in conjunction with the recently approved scheme by the same developer at 79 Silver Street. The management of the two student housing schemes at 79 and 40-68 Silver Street site will involve a single (full time) employee working across these two sites. The employee will have some support from nominated student wardens (typically older/ postgraduate students) living within each site. Staff parking would be accommodated at 79 Silver Street.
- 4.35 No on-site parking is proposed and students will not be permitted to bring cars to the site under the terms of the tenancy agreement. It is stated that the off-street parking spaces being provided at no. 79 will allow for limited and controlled use by those working at or maintaining either of the sites and will also be utilised (in a closely programmed manner) for loading/unloading by students at start and end of term.
- 4.36 However, the combined total of students rooms at 79 and 40-68 Silver Street site will equate to 115 students rooms and I am not satisfied that the provision of 3 parking spaces at 79 Silver Street provides the level of parking required to accommodate the demand during the arrival /departure periods at the start and end of the academic year. The information submitted provides very little clarity over how many students would be able to arrive at the site at any one time. I am concerned that management plan states that *"pre-planned arrangements will mostly be programmed on Sundays when access pressures on Silver Street are lowest and some availability of on street parking can be anticipated"*. This provides no assurance that the loading and unloading procedure can be fully accommodated within the site boundary of 79 Silver Street, therefore, the development is required to provide parking spaces within the site as per the recommendation in my pre-application response.
- 4.37 A layby currently runs across the site frontage and there are currently two access points which are protected by "No Waiting" parking restrictions (DYL). The layby is currently unregulated and there are no guarantees that any on-street car parking will be available during the arrival/ departure period. The applicants have indicated that they would fund any appropriate revisions to on-street waiting and loading restrictions along the site frontage. However, given Traffic Regulations Orders are under separate legislation to the Planning Act, there can be no guarantee that any changes to the parking regulations would be approved.
- 4.38 On-street refuse collection will occur and a designated refuse store is provided at ground floor level. It is envisaged that the refuse vehicle will park on the highway, and management staff bring bins to the front of the development and return the empty ones to the store. A designated holding area has been identified within the site and within 6m of the highway for bins awaiting collection.
- 4.39 The development will be required to produce a Travel Plan to encourage safe, healthy and sustainable travel options. A framework Travel Plan has been outlined within the Student Management Plan which includes;
- The appointment of a travel Plan co-ordinator which will be funded for a period of five years after first occupation of the site.

- Provision of sustainable travel packs to all residents including bus network and cycle network maps
 - Restrictions in tenancy agreement for ownership of car in Reading
 - Annual student travel surveys
 - Monitoring of cycle parking provisions
- 4.40 The full travel plan should be submitted 3 months after occupation so that full survey data can be provided of residents.
- 4.41 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. Cycle storage should be in the form of a lockable covered store. The location of the cycle store is conveniently situated in relation to the building entrance. Broxap galvanised heavy duty Sheffield cycle stands are proposed. The proposed location is acceptable, however, we require detailed plans confirming that the cycle parking provision meets the Council's adopted standards in terms of layout. I am, however, happy for this to be dealt with by way of a condition.
- 4.42 I note that the scheme proposes street tree planting, i.e. within the RBC highway, as opposed to tree planting within the frontage. It is unclear from the plans submitted why trees could not be accommodated within the site which has been raised by the Council's Tree Officer. The proposed planting may impact on services located below the footway and may reduce the footway width below an acceptable width. I note this has been referred to the Highways department for further comment.
- 4.43 The applicant should be aware that there would be significant transport implications constructing the proposed building in this prominent location. Any full application would be conditioned to ensure a Construction Method Statement is submitted and approved before any works commence on-site.
- 4.44 Please ask the applicants agent to submit suitably amended plans / information to address the above points prior to determining the application.
- 4.45 Transport recommended the following reason for refusal:
- The layout does not comply with the Local Planning Authority's standards in respect of vehicle parking which could result in on-street parking Silver Street during the arrivals and departure period at the beginning and end of term. This would adversely affect road safety and the flow of traffic, and in conflict with Core Strategy Policy CS24 and Sites and Detailed Policies document Policy DM12.
- 4.46 **Planning officer note:** The agent responded with the following comments:
"I am somewhat surprised by the strength of the Highways concern focused on the issue of student arrivals/ departures. The amount of traffic arising from this scheme will be very low and closely controlled by on-site management, with a number of factors limiting the amounts in this particular case;
- a. *The accommodation will be let on a full year basis (unlike many on campus University Halls which have to be vacated to allow for conference use during University vacations). The accommodation will*

be particularly attractive to those types of student (including many overseas and post graduate students) who do not return to a parental UK home address during university vacations. Indeed in some instances students who like the accommodation may choose to stay for the duration of their University attendance in which case their move in and move out could be 3 or more years apart.

- b. The existing traffic orders in front of the building include 2 sections of double yellow lines, each of which precludes waiting but allows for loading/ unloading outside peak hours. In these circumstances the proposal is not in fact dependant on any change to traffic orders in order to demonstrate the existence of 2 immediately adjacent on street spaces which allow for loading/ unloading. The applicants are not therefore reliant on the success of any traffic orders changes. They do however volunteer to fund the removal of redundant footway crossings and rationalisation of the parking/ loading provisions in front of the building in such a manner as RBC may feel most appropriate. Loading bays could be formalised if considered necessary for such low/ very occasional loading events.
- c. Vehicle use in connection with arrivals/ departures of students will be programmed by the site management on a 'timed slot' basis and spread over a number of days (which can be discussed and agreed with the highway authority). To quantify this for 79 students we would estimate that the peak unloading events would focus on 2 weeks in late September with a preference for weekend slots. It is reasonable to assume that around 20% of student residents could either be already present (from previous years) or arriving with limited luggage and no need of a car (eg foreign students or students relocating very locally on foot from other accommodation within walking distance). This leaves 63 students arriving over 2 weeks with a peak day (which can be defined by management) of no more than (say) around 15 student arrivals/ vehicle trips. Allowing 30 minutes timed slots a single parking or loading space can however be used for 16 arrivals over 8 hours per day at weekends or (if weekday off peak hours 10am-4pm and 7-9pm are added) for up to 224 arrivals over 14 days which equates to 1.6 times the actual combined capacity (140) of the 79 and 40 Silver Street schemes. End of year loading tends to be less concentrated in terms of timing and end/start of term moves in/out are likely to involve only around half the numbers of start/end academic year events. In the circumstances the applicants can be very confident that the 3 off street spaces available at 79 and the existing on-street highway arrangements are more than capable of accommodating student moves in/out for both sites (subject to suitable management to define arrival slots).
- d. In the case of the application site on Silver Street the practical effects on highway flow of the very occasional access needs of non-car use student housing are likely to be less than when 40 Silver Street was in active use as an equipment hire shop involving pick-up and drop of daily hired equipment with much of this during morning and evening peak traffic hours.
- e. Many existing smaller University Halls in other towns/ cities (including for example many of the Oxford, Cambridge and Central London Colleges) operate successfully in locations with nil off street parking and where the highways context is one of much greater highway pressures/ constraints than those evident on Silver Street. Annual and in many cases termly loading is successfully arranged and pro-actively managed by accommodation managers working with highway authorities to minimise effects on other activities. In Oxford for example this

includes the issue of time specific passes to enter and load within otherwise pedestrianised and/or "loading time limited" areas.

- f. If purpose built and managed student accommodation (PBMSO) is not allowed in sustainable locations such as Silver Street students will not disappear - in practice they will have to find other accommodation within the private housing market. Much of this is offered to students as Homes in Multiple Occupation (HMO). Some smaller non-HMO flats available in the mainstream housing rental market will also be occupied by students in practice. In both cases (unlike PBMSO) student car use throughout the year is possible with these types of accommodation so parking/ highway effects including effects on existing residents' parking availability are likely to be very much more significant and effectively unmanaged other than by normal highway authority powers. As a very direct example if PBMSO is refused at Silver Street there is a very strong possibility (given the accessibility to the University) that students would be deflected to other HMO or private rental accommodation in close vicinity to Silver Street/ Mount Pleasant with potentially greater effects on highway flows than a closely managed PBMSO.*

4.47 *Transport responded as follows:*

"All new developments for student accommodation outside of the town centre are required to provide operational parking spaces within the site to accommodate the arrival and departure periods. The previously refused application ref 172118 included the provision of 3 parking spaces set into the building frontage in a similar arrangement to the approved development at 79 Silver Street. Subsequently, the agent was advised that the development would need to include operational spaces in the pre-application response emailed on 8th March 2019.

The combined total of students rooms at 79 and 40-68 Silver Street site will equate to 115 students rooms. The agent has estimated that 20% of student residents could either be already present (from previous years) or arriving with limited luggage and no need of a car (eg foreign students or students relocating very locally on foot from other accommodation within walking distance), leaving in the region of 92 students arriving across the 2 sites.

The A327 Silver Street is part of the "A" road network carrying between 9,000 and 10,000 vehicles a day. Students arriving by car are likely to have a personal belonging that cannot be unloaded in one trip. Therefore, there will be multiple trips back and forth across a busy road. This is likely to cause delay to the loading/unloading process or more likely result in vehicles pulling up as close of possible to building entrance whilst the unloading process occurs. Given the limited number of spaces at 79 Silver Street, any delays to the arrival process will result in drivers looking for an alternative location to park. Silver Street is a one-way road, therefore, if there if the operational spaces are full, drivers may slow down or pull over and wait for a space to become available to avoid the one-way system.

The agent has indicated [*in a further email as included in Appendix 1*] that if Block A is moved away from Platinum Apartments it may be possible to provide an off-street bay and I would suggest that this should be investigated further."

(iii) **Public/ local consultation and comments received**

4.48 58 properties were consulted by neighbour consultation letter. A site notice was displayed. Five objections were received from residents living in Platinum Apartments, Stirling House, and Upper Crown Street as follows:

- 1) This area is becoming heavily overdeveloped, with new flats being built and existing student areas already present. This is not pleasant for existing residents of the area and provides no benefit to the current community.

There is not the appropriate infrastructure, parking spaces, stores etc. to facilitate a substantial increase to the population of this street.

There have already been complaints made about anti-social behaviour, littering and vomit in the streets attributed to the current student population of the area, and I would like this behaviour to decline rather than increase, so I am highlighting these issues and displaying my public objection against this planning application.

- 2) Currently, the surrounding apartment buildings comprise of a number of young families and professional workers who both rent and own their property. Adding further student accommodation to the area will be wholly inappropriate. There is already vast amount of development in the area, with student accommodation at Crown Street a couple of minutes walk away. In addition, Silver Street Developments Ltd (the applicant) already has planning permission for student accommodation at 79 Silver Street, just across the road from the proposed site.

According to the Sunlight and Daylight Survey, submitted with the plans, our living room has been incorrectly marked as our bedroom and vice versa. Our living room is a large and open plan living space, directly facing the proposed site, with a large bay 3-window arrangement, designed to catch the light. This room is a unique selling point, somewhere we spend most of our time (when not at work), and having a 4 storey building directly opposite will substantially reduce the amount of light we have during the day. The Survey does not accurately depict what effect the proposed buildings will have on the surrounding properties and their measurements are not taken from precise points.

If student accommodation (HMO), is allowed to be put in place here, this is likely to cause local residents significant disturbance, due to the potentially unsociable hours that will be kept by the tenants. There is already an issue with antisocial behaviour, due to other student accommodation nearby and Silver Street's proximity to the town centre. Those currently living in the area are mainly working professionals and young families, who do not want to be kept awake at night or woken up in the middle of the night.

Our flat in particular faces in the direction of the proposed site, with the only available windows opening onto the main road and towards the proposed site. This means that any increased noise levels and

antisocial behaviour will be amplified greatly during the summer months when windows are open; leaving us with little choice but to consider keeping our windows closed during the hotter months.

The sheer number of rooms being proposed could be quite imposing considering the current environment and surrounding buildings that already exist in the area, in addition this type of accommodation could encourage crowds to gather outside of the buildings and the surrounding area, which will reduce our privacy and could pose a potential security/criminal risk.

Accommodations of this nature creates transient communities, causing parking problems for those already in the area (and their visitors), along with associated anti-social behaviour, increased foot traffic and late hours kept by those who may be attracted to accommodation of this nature. As a result, this sort of accommodation is like to discourage other working professionals or young families to the area, which is the general demographic here.

Value of local property is likely to decrease significantly if the proposed plans are accepted and acted upon, as noted above. Due to the nature of those already living in the area, having a property like this is likely to reduce attractiveness of the area to other working professionals and young families alike and may even force those renting to look elsewhere, resulting in loss of renting potential for those who own and rent the flats, not to mention any owners who are considering selling their flat, only to find that the value has dropped.

Parking in the area is already a major commodity. Those making this application appear to have given very little thought as to how anyone living in the block(s) of 79 rooms is going to park their cars.

- 3) Last year alone over 2,000 additional beds were provided for students in Reading. Numbers of students coming to University this year are 650 less, (drop in birth rate) and 650 who would have come from Europe. Currently there are around 2,500 beds in student houses with NO tenants from 1st July 2019. So why approve another 79 student bedrooms? There is no longer the demand for additional student accommodation in Reading. This is also a small site where 79 units is a significant over development. We need housing for families, not for students.
- 4) The recent approval upon appeal of 61 studios at 79 Silver St will provide enough student "activity, life and vitality" for the neighbourhood's permanent residents. (Developer's Design Statement Section 2.8).

The approval of a further 79 student studios directly opposite at nos 40-68 will bisect and transform the lower end of Silver St into a student enclave. This outcome would contradict the GW Developer's statement which advocates "a dispersal of managed student accommodation developments." (Developer's Design Statement Section 2.8).

Silver St is predominately made up of houses and flats which are occupied by single people, families and professionals. The social and work schedules of the Street's permanent residents differ from those of a transient student population. The character and atmosphere of the street will change with all the additional comings and goings and the term time activity and holiday down time fluctuations.

The developer brushes aside the 2017 revised Reading Development plan which is awaiting approval and is no doubt anxious for a speedy decision based upon the now out of date 2008 strategy (revised in 2015). In the 2017 document the SHMA (Strategic Housing Market Assessment) advocated there was not a need for significant new student accommodation (H12).

Furthermore in Section 9.2 "The Strategy for East Reading" the areas of tension between the University and surrounding areas are acknowledged and that these need careful management. It advocates a solution: "to support purpose built accommodation on established university sites." This recommendation reduces the need for students to travel and allows "key sites elsewhere" to "deliver much needed general housing." Both nos 40 and 60-68 Silver Street previously had permissions to build 14 and 6 flats respectively; in keeping with the predominately residential locality. By opting for one bed studio accommodation the out of town developer avoids having to fulfill any local housing planning obligations and regulations.

The developer argues that by providing managed student accommodation it would free some multiple occupancy houses for local families' use. The high specification of the proposed development will attract affluent students who would have opted for more expensive better appointed accommodation with or without this development. The HMO type student accommodation will still be in demand for those students on a tight budget. Even the university in its response to 2017 plan acknowledges that student studio developments near the city centre charging in the region of £185 to £296 per week are not the solution for affordable accommodation and are beyond the means of the average UK student living on a maintenance loan capped at £8700 (Reading Borough Local Plan Public Examination Issue 7 Housing Barton Willmore September 2018).

On the submitted plans (p16 Developer's Design Document) Block A has been compared to the highest and widest dimensions of Platinum Apts thereby ignoring the smaller block which is adjacent to the proposed development. Page 19 details the transference of Block B's upper storey to form a 4th floor in the roof of Block A. This arrangement overpowers the adjacent lower section of Platinum Apts and is a case of overdevelopment. To create an optical illusion that Block A does not dwarf the neighbouring Platinum Apts, each computer image has been created at a flattering angle taken from the prospective of the other side of Silver Street approximately opposite to the Platinum Apts' entrance. The 3 storey Rimald House and the lower section of Platinum Apts are similar in height; yet Platinum Apts is not afforded the same design considerations. The sombre grey leaden exterior appearance of Block A's 4th floor roof

level and its large boxy "Victorian chimney shaped" dormers are not in keeping with the adjacent Hiett Close's and the lower block of Platinum Apts traditional roof lines. The roof level dominates Block A's frontage and makes it appear top heavy.

The baseline used for the light survey is the refused application for 79 studios on no 40 Silver St instead of what was on the site prior to development. Even using this baseline, Flat 1 Platinum Apts' kitchen window fails to meet the guidelines as it is overshadowed by the height and depth of Block A.

The lack of a "Smoking Policy" on site raises the possibility of the noise and nuisance of smokers congregating outside the proposed entrance near Platinum Apts. A centralized entrance would resolve the issue and would distance the development's neighbours from day to day comings and goings and any potential noisy incidents at unsociable hours. It would relieve the need to liaise with the sites' management over unruly behaviour and would leave neighbours free to enjoy their leisure time. A central entrance would also be more in line with no 79 which would be practical as the two developments are to share facilities.

The plan indicates that the uncovered refuse area for the 79 studios will run along the boundary wall near Flat 1 Platinum Apt's kitchen and bathroom windows. To avoid noise, odour and potential vermin infestations it would be better if this could be situated in an enclosed facility towards the middle of the development similar to the Platinum Apts' arrangement. If doors opened on to the street there would be no need for the bins to be left out waiting collection. It is questionable if the existing store and collection area are large enough. The noises from the coming and goings of the student cyclists could also be minimized if the cycle store was also moved near a central entrance.

The absence of cycle lanes in Silver Street raises road safety issues. The time quoted by the developer to reach the Whiteknight campus entrance uses Silver St. Cyclists already use the pavement to avoid the narrower stretches of the street, parked cars and fast moving traffic. This puts pedestrians especially children entering and exiting the nearby school and the elderly at risk. The danger is increased when cyclists speed the wrong way down the one way street gathering momentum on the sloping pavements. An increase in cyclist numbers will exacerbate the issue.

The development's high specification will attract affluent students who are more likely to have a car. How the management team will identify any lease infringements is unclear. Furthermore, car ownership and the legal parking thereof away from the site will not contravene any laws; therefore the legalities and enforcement of terminating offenders' tenancies will be questionable. Street parking is already at a premium in Katesgrove for council tax- paying residents without any additional demands. The arrangements for 140 students moving in "mostly" on two consecutive Sundays, with only three car parking spaces at no 79 and the chance that one of the on street spaces may become vacant are unrealistic and inadequate. The process will cause inconvenience to the permanent residents and

will result in the unauthorized use of their parking facilities. No consideration has been given to how the traffic quickly picks up once it is clear of the London Street junction, Silver St's one way status, or its use by buses and by emergency vehicles. At the end of the academic year students will leave when their course finishes which will lead to ad hoc pick-ups.

The sites at nos 40 and 60-68 should be used to alleviate the local housing shortage and to maintain the character of the Silver St neighbourhood. Enough is enough; and 61 students are more than enough for Lower Silver St to accommodate.

One further objection was received following consultation on the amended plans along with one maintained objection (as no. 2 above):

- 1) Once again the sunlight studies have been done on a neighbouring property which faces the opposite way to my house [69 Upper Crown Street]. I have three windows which directly get sunlight from this side of the house; which will not if I have flats there. I also do not see the pre agreed wall between my property and flats, I have made various comments that this development should not compromise my security.
- 2) Having read through those amendments, I believe our original objections to this application would still be relevant as the amendments appear to be only cosmetic in nature.

5.0 RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 5.2 The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (NPPF, 2019)
Chapter 5 - Delivering a Wide Choice of High Quality Homes

Reading Borough Local Development Framework - Core Strategy (2008, altered 2015)

Policy CS1 (Sustainable Construction and Design)
Policy CS2 (Waste Minimisation)
Policy CS3 (Social Inclusion and Diversity)
Policy CS4 (Accessibility and Intensity of Development)
Policy CS5 (Inclusive Access)
Policy CS7 (Design and the Public Realm)
Policy CS9 (Infrastructure, Services, Resources & Amenities)
Policy CS11 (Use of Employment Land for Alternative Uses)
Policy CS14 (Provision of Housing)
Policy CS15 (Location, Accessibility, Density and Housing Mix)
Policy CS20 (Implementation of Reading's Transport Strategy)

Policy CS23 (Sustainable Travel and Travel Plans)
Policy CS24 (Car/Cycle Parking)
Policy CS34 (Pollution and Water Resources)
Policy CS36 (Biodiversity and Geology)
Policy CS28 (Trees, Hedges and Woodland)

Reading Borough Local Development Framework - Sites and Detailed Policies Document (2008, altered 2015)

Policy SD1 (Presumption in Favour of Sustainable Development)
Policy DM1 (Adaption to Climate Change)
Policy DM3 (Infrastructure)
Policy DM4 (Safeguarding Amenity)
Policy DM10 (Private and Communal Outdoor Space)
Policy DM12 (Access, Traffic and Highway-Related Matters)
Policy DM18 (Tree Planting)
Policy DM19 (Air Quality)
Policy SA14 (Cycle Routes)

Supplementary Planning Guidance/Documents

Revised Parking Standards and Design (2011)
Revised Sustainable Design and Construction (2011)
Affordable Housing (2013)
Planning Obligations under S106 (2015)
Employment, Skills and Training (2013)

Submission Draft Reading Local Plan (March 2018)

Policy CC1 (Presumption in Favour of Sustainable Development)
Policy CC2 (Sustainable Design and Construction)
Policy CC3 (Adaptation to Climate Change)
Policy CC5 (Waste Minimisation and Storage)
Policy CC6 (Accessibility and the Intensity of Development)
Policy CC7 (Design and the Public Realm)
Policy CC8 (Safeguarding Amenity)
Policy EN2 (Areas of Archaeological Significance)
Policy EN15 (Air Quality)
Policy EN16 (Pollution and Water Resources)
Policy EN10 (Private and Communal Outdoor Space)
Policy H12 (Student Accommodation)
Policy TR3 (Access, Traffic and Highway-related Matters)
Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)

Other Documents

- Berkshire (including South Bucks Strategic Housing Market Assessment) Berkshire Authorities and Thames Valley Local Enterprise Partnership, Final Report, February 2016, prepared by G. L. Hearn
- Local Plan Background Paper (EV002), March 2018
- Council Response to Issue 7: Housing (EC009), September 2018
- University of Reading Response to Issue 7: Housing (EP017), September 2018
- University of Reading Statement of Common Ground (EC042), November 2018 [including Accommodation Strategy Part 1 - Gap Analysis July 2018-2028, prepared by Cushman & Wakefield; and Campus Capacity Study, prepared by Barton Willmore]
- Reading Borough Local Plan Consultation on Main Modifications (EM001) June 2019

Technical Housing Standards - Nationally Described Space Standards (2015), DCLG
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

6.0 APPRAISAL

6.1 The main issues to be considered are:

- (i) Principle of use/location
- (ii) Design quality
- (iii) Density and mix
- (iv) Impact on amenities of adjoining occupiers and future tenants
- (v) Highways and transport issues
- (vi) Landscape
- (vii) Other (S106, CIL, noise, air quality, drainage)

6.2 (i) Principle of use/location
The location of the site is dominated by residential uses with some business, commercial and community uses. It is an accessible location on the edge of the town centre and the redevelopment of this brownfield site would represent a sustainable development and an effective reuse of the site. This would accord with national and local policies, in particular Paragraph 11 of the NPPF, which sets out a presumption in favour of sustainable development, Core Strategy Policy CS14, and Sites and Detailed Policies Document Policy SD1.

6.3 Since the previous student scheme was refused (172118) the site has been subject of demolition, so is now a cleared site. However, its previous use was commercial, but with no viable commercial user having come forward over a period of many years. Core Strategy Policy CS11 sets out that when assessing proposals outside of the Core Employment Areas, which would result in a loss of employment land, that the following criteria need to be considered: (i) is it accessible by a choice of means of transport?; (ii) would its continued employment use be viable?; (iii) is there a surplus of similar sites?; (iv) would continued employment use detrimentally affect the amenity and character of the area?; (v) is the need for alternative uses stronger than for retention?; (vi) would the proposal result in a piecemeal loss of employment land?. The principle of the loss of the commercial use for residential use was accepted with the granting of planning permission for application 150885/FUL (40 Silver Street) and student housing (16 units) at 62-68 Silver Street (11/01917/FUL).

6.4 At present there is no adopted policy relating to the location or provision of student accommodation. However, the draft Local Plan includes Policy H12: Student Accommodation, which states that:

"New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. There will be a 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 the above sites."

- 6.5 As this policy is at an advanced stage, because the Plan has been the subject of Examination, and the consultation on Main Modifications ended in July of this year, it is considered to have sufficient weight and is therefore, material when assessing the proposal. This approach accords with paragraph 48 of the NPPF.
- 6.6 The emerging policy contains a clear presumption against proposals for new purpose built student accommodation (PBSA) unless it can be clearly demonstrated how such a proposal would meet a need that could not be met on the identified sites in the Local Plan or sequentially preferable sites. The application site is not considered to be a site which forms an extension of existing student accommodation, and therefore, the applicant was invited to submit a statement of need.
- 6.7 The submitted statement focusses on figures of need both current and future, as identified from evidence and background papers presented by the University of Reading for the Reading Borough Local Plan Examination, as well as more generic data from other sources.
- 6.8 As background, for the Local Plan examination hearings in September and October of 2018, the University of Reading (UoR) submitted 'Accommodation Strategy Part 1 - Gap Analysis July 2018-2028, prepared by Cushman & Wakefield; and Campus Capacity Study, prepared by Barton Willmore. The Gap Analysis identified that 5,015 students in 2017/18 academic year as the overall number of students in all years requiring accommodation but not housed in PBSA. This was understood by the LPA, and was established at examination. However, this did not detail any accommodation preference and therefore did not necessarily mean that 5,000 students would move into a PBSA if such accommodation were hypothetically made available, and which has since been confirmed by the UoR. The UoR subsequently confirmed in May 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.
- 6.9 The Council's position as set out in the Reading Borough Local Plan Background Paper (March 2018 and the Statement of Common Ground (agreed between UoR and the Council, November 2018) is that the substantial increase in purpose-built student accommodation in recent years is broadly similar to the reported and predicted increase in the SHMA between 2010 and 2018 of around 2,900 students. The Council, however, also recognises an existing level of need for student accommodation of around 1,000 bedspaces, which relates to the first year guarantee need for bedspaces. The Statement of Common Ground includes a recognition of this existing level of need, which subsequently led to a proposed main modification to Local Plan paragraph 4.4.96 to state:

"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."

- 6.10 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 that there are opportunities to accommodate this level of need on locations compliant with Policy H12.
- 6.11 The LPA had very serious concerns about the UoR's estimate of growth in student numbers from 16,000 in 2017/18 to 21,000 in 2028, as presented at the Local Plan Examination. Such concerns were set out in Appendix 2a of the Statement of Common Ground. Officers do not agree that it has been clearly demonstrated that the figure of 5,000 students represents the level of existing 'need' and are of the view that these growth figures are untested and hugely ambitious. However, 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. Also, as set out in the Statement of Common Ground (Appendix 2A), it is considered that such growth would have implications far beyond accommodation needs, including transport infrastructure, the provision of services and facilities, pressures on the natural and historic environment and impacts on existing communities.
- 6.12 As well as issues relating to need, although the application site is not a specific allocated housing site, its development for alternative uses to housing, would reduce the Council's ability to meet its own housing need, thereby conflicting with policies CS14 and emerging policy H1. Also, unlike a housing site, provision of PBSA does little to meet the Borough's identified need for affordable housing, in conflict with policy CS6, and emerging policy H3.
- 6.13 The applicant's submitted Statement of Need identifies that the provision of private sector student accommodation can help to free up other accommodation occupied by students, such as HMOs. It is considered, however, but this would be dependent on whether such accommodation was priced at a level to offer a genuine alternative. No clear evidence has been presented by the applicant to show that this would be the case, and indeed there is information to suggest that the PBSA, which has been delivered in the Borough so far (mainly central Reading), are between £185 and £296 per week. This pricing reflects the high-specification accommodation, featuring self-contained studio units, and which is out of the price range of the average student. As a comparison, in a recent online search of available data on property websites, those properties advertised as student friendly HMOs within the University area of Reading, were priced from ca £90 pppw up to ca £156 pppw, the latter being the better quality with ensuites. ,
- 6.14 The Statement of Common Ground echoes this concern for whilst the UoR considers that the PBSA does widen choice it is not affordable to many of their students in need of accommodation, and that a partnership arrangement may be needed to resolve the issue. This 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."

- 6.15 No information has been submitted alongside the planning application which deals with issues such as rental levels, and whether there will be any arrangement in place with the UoR.
- 6.16 It is therefore not accepted that the evidence presented by the applicant demonstrates that the application site would meet a need that cannot be met on those identified sites within the Emerging Local Plan allocated for student accommodation. The majority of these are located in close proximity to the Whiteknights Campus, or on sequentially preferable sites. It is therefore considered that the proposal would not comply with Policy H12 of the Emerging Local Plan and conflicts with the aims of the NPPF.
- 6.17 It is concluded therefore, that the principle of the use of the site for student housing would not be acceptable. The proposal is further assessed below with regard to its compliance with existing adopted policies relating to the character of the area, quality of the layout and design, residential amenities and transport.
- (ii) **Design quality**
- 6.18 Policy CS7 requires that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including: -
- Layout: urban structure and urban grain;
 - Landscape;
 - Density and mix;
 - Scale: height and massing; and
 - Architectural detail and materials.
- 6.19 The scheme will be assessed to ensure that the development proposed makes a positive contribution to a number of urban design objectives. This part of the report will look at the layout, scale and architectural detail of the proposed scheme.
- 6.20 The amended proposed scheme is a 'n' shaped building, comprising a block to the rear of the site with 2 storeys plus basement (Block B), a northern link building with one storey plus basement, and a frontage building to Silver Street (Block A).
- 6.21 With respect to the height and appearance in the streetscene Block A is proposed with a mono-pitched roof, with inset flat roofed dormers. The overall design is groups of projecting sections with corresponding dormers above, with a variation in building line to break up the mass of the frontage. The proposal is for a contemporary appearance using fair faced brick, feature recessed panels, brick cills, standing seam zinc roof and aluminium windows and ventilation louvres.

- 6.22 The maximum height of this building would be 12.2m above ground level, when viewed from Silver Street, which compares to Platinum Apartments to the north (right), at 10.2m, and Hieatt Close to the south (left), at 11.0m.



Proposed Silver Street elevation

- 6.23 This compares to the refused scheme, which was 13m at its maximum height as shown below (*please note that the refused scheme was considered in the context of 62-68 (left of elevation), which was still in existence, and not part of the application site area, at that time*).



Refused elevation - Silver Street

- 6.24 Following the previous refusal which included a reason which referenced the height of Block A, the applicant sought pre-application advice (182150) through the presentation of a draft scheme to Reading's Design Review Panel (DRP) in January 2019, as shown below.



Pre-application elevation to Silver Street

- 6.25 This proposed reducing the number of storeys above ground to 3 no., equating to a maximum height of 11m. This DRP considered sat "*extremely comfortably within the visualisations provided, in fact to the frontage the Panel considered an additional storey could be achieved. The mono-pitch roof form should be revisited come what may as it provides an unnecessarily elevated ridge line*". This led to the applicant increasing the number of storeys back to 4no. above ground level for the submission scheme. A further review by the DRP held in April 2019, confirmed that this was acceptable in principle, subject to reducing the pitched roof

height to drop the overall height, which the amended proposal (as shown above) does.

- 6.26 Officers consider that although the proposed design is more contemporary than existing neighbouring buildings, because of the refinements of the front elevation, which includes removal of the undercroft parking to bring built form to the ground, in combination with the triplet projections, that the appearance is more acceptable than the refused scheme. There are still concerns, as raised by the DRP regarding the choice of proposed materials, and *"whether this ties strongly to the brick foundries historically prevalent in the area"*, but this could be addressed through a suitably worded condition.
- 6.27 More fundamentally however, although the proposed scheme is considered to be an improvement on the refused scheme, it is not considered that the changes have gone far enough in addressing the relationship with Platinum Apartments, discussed further in the amenity section below.
- 6.28 One suggestion by officers, and highlighted in the committee report for the refused scheme, was to reduce the bulk by using a similar design approach as was used with the approved 79 Silver Street opposite, but this was not reflected in the amended scheme.



- 6.29 Additionally, one of the key issues with the respect to the refused scheme was that the combination of the heights of Block A and Block B and their proximity to each other would lead to a cramped appearance, resulting in the site appearing overdeveloped. This issue was borne out by the Inspector into the appeal who considered the proposed courtyard to be oppressive and that the constrained nature of the proposed courtyard led the Inspector to conclude that the development would also be an overdevelopment of the site.
- 6.30 Amendments have been made to the scheme, which reduce the overall height of the rear building B by removing one storey (as advised by DRP and during pre-application discussions), whilst adding a storey to Block A, and by moving the buildings slightly further apart as can be seen on the plans and images below. DRP considered that the amended roof form of Block B *"looks much more in keeping with the surrounding context"* and the dropped roof level would *"allow increased light into the courtyard"*:



Refused Scheme - Lower Ground Plan



Proposed - Lower Ground Plan



Refused Scheme - Section



Proposed Scheme - Section

- 6.31 Officers consider that while the overall distance between the blocks is improved they are still considered to be too close to each other and would still result in an oppressive space, especially because of the scale of Block A.
- 6.32 In addition officers are still not convinced by the inclusion of the northern link section, which is considered to add to the overall feel of an overdeveloped and hemmed in site. Officers provided advice in this regard and during pre-application discussions in January 2019 and the DRP suggested the removal of units from the northern edge of the courtyard. Further exacerbating this is that units previously shown at lower ground level have now been shifted to the ground floor level of this link.
- 6.33 It should be noted that there have been changes to elevation details and proportions, which have responded positively to matters raised by DRP (full comments Appendix 2) and in particular officers now consider that Block B is acceptable in its design and overall scale and massing.



Refused - Block B from courtyard



Proposed - Block B from courtyard



6.34 The rear of Block A has also been simplified.



6.35 In conclusion, however, although there have been improvements to the overall design, scale, massing and layout of the scheme it is still considered to be an overdevelopment of the site. The proposed height of Block A and its appearance in itself are an improvement as compared to the refused scheme. However, its overall scale and mass, in the context of the streetscene, combined with its proximity to Block B and the link building, means that it will be read as one. The proximity to surrounding existing buildings, all contribute to failing to secure a high quality design required by Policy CS7 and harm the character and appearance of the area.

(iii) **Density and mix**

6.36 Developments should provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures to accord with NPPF and local policy DM5, and should include for providing for the housing needs of students.

6.37 However, Policy CS15 sets out that an:
"appropriate density and mix of residential development within the Borough will be informed by: -

- An assessment of the characteristics, including the mix of uses of the area in which it is located;*
- Its current and future level of accessibility by walking, cycling and public transport, as defined in Policy CS4;*
- The need to achieve high quality design in accordance with Policy CS7; and*
- The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers."*

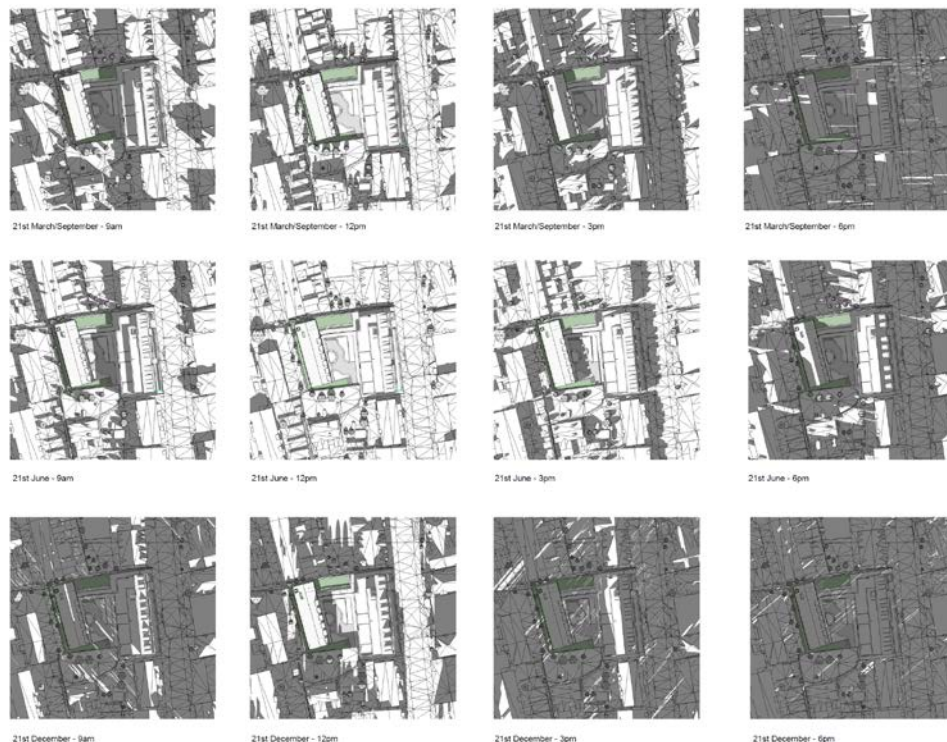
6.38 As set out above the proposed scheme has not demonstrated that there is a need for student accommodation which meets the requirements of emerging policy DM12, and therefore the overall principle of the scheme is not acceptable.

6.39 However, even if a density of 564 dwellings were acceptable (not unusual for an edge of centre scheme), and subject to other policy considerations being met, there would still be an ongoing concern at the potential concentration of student accommodation in this area. Combined with No. 79 Silver Street opposite (60 units), and 99 student rooms to the north of Crown Street, the scheme would detrimentally impact the lives of adjoining occupiers. This is an issue also raised through neighbour consultation as documented above. By failing to provide a mixed and balanced community the scheme would be contrary to Policy CS15, NPPF para.50 and emerging Policy H12.

- (iv) Impact on amenities of adjoining occupiers and future tenants
- 6.40 Policy DM4 (Safeguarding Amenity) states that development should not cause a significant detrimental impact to the living environment of existing or new residential properties in terms of privacy and overlooking, access to sunlight and daylight, visual dominance and overbearing, noise and disturbance, artificial lighting, crime and safety. Policies CS7 and CS15 also refer to the need to ensure that the amenities of neighbours are not significantly harmed.
- 6.41 One of the previous reasons for refusal was that the height, position and bulk would result in a loss of amenity to neighbouring residents through overlooking, loss of privacy, loss of light, and noise and disturbance arising from the use of the small site for 62 students. The Inspector into the previous appeal supported the majority of these amenity concerns, and considered that the proposed development would create “the sense of being hemmed in by built development” and would be likely to “make the outdoor living environments for the existing occupiers gloomier”.
- 6.42 There have been some amendments to the scheme with respect to seeking to improve amenity for surrounding and proposed residents including:
- Reduction in a unit at third floor (top) closest to Platinum Apartments and reducing the depth of Block A units at third floor level to improve daylight/sunlight levels and reduce the bulk when viewed from neighbouring buildings.
 - Reduction in the height of Block B.
 - Removing lower ground floor units on the northern link.
 - Moving the blocks further apart.
 - Introducing defensible space in front of lower ground floor units, and ground floor northern link units.
- 6.43 Despite the amendments to the refused scheme it is still considered that the overall height and mass of new buildings, at part 4 storeys, with buildings on three sides, and proximity to boundaries, would have a detrimental effect on nearby residents who would find their outlook and amenities harmed through loss of privacy, overbearing and loss of light. In particular this would be the residents to the north of the site in Upper Crown Street and Platinum House. A number of objections have been received which focus on such issues.
- 6.44 The changes made to reduce the height of Block B has improved the situation in this part of the site, but the addition of studios at the ground floor on the northern link, and the retained proximity of the units on the northern end of Block A, continue to present a scheme, which is considered to be too overbearing and too dense for the plot, which would still be dominant in the outlook from internal living spaces and gardens. The upper studio accommodation, specifically within Block A at second and third floors would be close to the northern boundary of the site, which would be likely to invade the privacy of adjoining occupiers.
- 6.45 The purchasing of the adjacent site since the refusal provided the opportunity to present a less dense scheme, however the proposal would still bring 79 students to a small site. This would not only create a significant detrimental effect to neighbouring amenity with regard to the level of noise and disturbance from outside use and the general comings and

goings, but would also provide a poor level of amenity for the proposed residents. In particular, the proximity of the blocks would reduce the potential for the outside space to provide an effective quality of space in terms of user experience, especially since this is an area through and around which students would access rooms. Although the central courtyard provides a better ratio of space per student than the previous scheme, it is still considered inadequate for the proposed 79 students, and would still feel cramped, overlooked and dominated by the mass of buildings. Occupiers of the space would still experience *"the overwhelming sense of being observed whilst using this space."* (Inspector into the previous refusal).

- 6.46 The submitted Daylight & Sunlight Study analyses the impact of the proposed development against a baseline of the former buildings and the refused scheme (172118). This confirms that the properties most impacted would be 69 Upper Crown Street and the south facing units in Platinum Apartments. Of the 10 rooms (a total of 19 windows) tested in these specific properties that were tested overlooking the site 4 rooms would suffer an adverse impact and in 2 cases an over 40% reduction in daylight is anticipated. Although this is an improvement on the refused scheme, this, in combination with other amenity concerns, is considered to be unacceptable.
- 6.47 The submitted solar study also shows (see below) that even on June 21st that the courtyard space would, for large parts of the day, be wholly or partially in the shade, which would contribute to it not being a quality amenity space.



- 6.48 The location of the bin and bicycle store areas close to the Platinum Apartments on the ground floor would not only be unpleasant for those residents in terms of noise and disturbance arising from the activity of use, and potential odours, but also for the studio located on the thoroughfare

from the main entrance. This unit would be surrounded by service space, and as the front door would open directly onto the main entrance space it would be noisy. The applicant has advised that this room would be designated for the on-site warden, who would be well placed to *observe and control student behaviour with 'eyes on the street entrance point'*. This is not considered a suitable justification for this unit.

- 6.49 In conclusion the proposed scheme is not considered to have sufficiently resolved amenity concerns. The siting of the buildings are still considered to be too close to the properties on the northern side, and to each other, and too densely developed a plot, with resultant detrimental amenity issues both within and around the site contrary to policies DM4, CS7 and CS15.

(v) Highways and transport issues

- 6.50 The transport comments are provided in full above. Transport have objected to the scheme based on the level of off-road parking spaces, proposed, to be shared with the site opposite (no. 79), and the level of parking required to accommodate the demand during the arrival and departure periods at the start and end of the academic year. It is considered that the proposal would adversely affect road safety and flow of traffic. A number of neighbour respondents also refer to such concerns.

- 6.51 Transport also require details of the cycle parking provision in terms of layout, but this could be dealt with by way of a condition.

- 6.52 The applicant responded to Transport with further clarification as to how the proposal could work, however Transport still consider that the scheme would not comply with relevant transport policy. A reason for refusal is included regarding vehicle parking along with a refusal reason related to a lack of S106 obligations which includes with respect to a Student Travel Plan and payment towards road restriction works.

(vi) Landscape

- 6.53 During the course of the application Block A was moved back to re-incorporate trees within the site along Silver Street, which had initially been shown within the highway, which the Natural Environment officer considers positive. There are a number of questions about the detail of the proposed landscaping to which the applicant has not yet responded. However, there is no fundamental objection to the landscape scheme as proposed. This aspect of the proposal would be acceptable subject to conditions to ensure the landscaping is carried out as proposed and to secure additional detail.

(vii) Other (S106, drainage, equalities)

S106 planning obligations

- 6.54 Had the planning application been found acceptable negotiations for a S106 legal agreement would have progressed to secure:
- i) an acceptable mitigation plan or equivalent contribution towards the provision of Employment, Skills and Training for the construction phase of the development,
 - ii) a travel plan and highway alterations
 - iii) a restriction on occupancy to students only,
 - iv) implementation of the student accommodation management plan,
- The absence of such an agreement is recommended as a reason for refusal of planning permission.

Drainage

- 6.55 The sustainable drainage details submitted have been assessed and confirmed to be acceptable.

Equalities Impact Assessment

- 6.56 In determining this application the Committee 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, gender, and sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. CONCLUSION

- 7.1 The purchasing of the adjacent site since the refused scheme provided the opportunity to develop a less dense scheme, however, it appears, albeit that adjustments have been made, that the scheme overall has blocks which are still too close together, and to surrounding neighbours, and at too high a density. A pre-application scheme was considered by the Design Review Panel in January 2019 and then the submission scheme in April, however, the changes made are not considered to have gone far enough to address the fundamental concerns regarding overall, scale, mass and proximity to neighbouring properties with resultant detrimental amenity issues.
- 7.2 The Officer advised the applicant that the overall quantum of development needed to be reduced so that there would be better spacing between the proposed buildings and especially the properties to the north. In particular it was suggested that the northern link block be removed and also units within Block A to assist with improving the overall proposal. The applicant has suggested some further amendments that could be made, which are documented in Appendix 1, however these are not considered to be sufficient to remove the objections to the proposal, and in particular the specific policy objection regarding the need for student accommodation.
- 7.3 The proposed development is not considered to comply with the relevant Development Plan Policies as assessed above. It is therefore recommended that it should be refused planning permission for failing to provide an acceptable design, for leading to a loss of amenity for neighbours and future tenants, for failing to provide for a mixed and balanced community and for the absence of a S106 legal agreement.

Case Officer: Alison Amoah

APPENDIX 1: EMAIL FROM AGENT WITH SUGGESTED AMENDMENTS - received 9/8/19

We are entirely willing to make further detailed adjustments to the scheme if this can secure a recommendation for approval. I am not clear however that there is much we can do that would satisfy all the matters you schedule.

I would take the opportunity to comment as follows in respect of your numbered points;

1. Relationship between block A and block B

In comparison to the previous appeal scheme the height of block B is now a storey lower (two stories now was then three above ground), and the depth of both Blocks A and B has been reduced. These changes have in my view significantly reduced the sense of enclosure that was the subject of the comments by the inspector that you quote. As you know the rear elevation of Block A was simplified following Design Review Panel comment and in the process this has slightly reduced the courtyard again at lower levels. We are willing to reverse this adjustment/ adjust the Block A rooms facing into the courtyard again if this would assist? Or if courtyard width is at the margin of acceptability we could consider a slight further reduction in the overall depth of Block A (further reduce room sizes/ numbers whilst keeping a central corridor layout). We could also consider reducing the frontage set back from Silver Street for Block A and thus widen the courtyard -there is a precedent of the adjacent Jubilee apartments which are at back of footway. Another and very simple possibility is to move block B closer to the rear site boundary reducing the landscape behind it (and possibly deleting corridor windows). Any or all of these possibilities can be explored if the width of the courtyard per se is critical to you. However in our view the proportions of the courtyard are now attractive from a student experience viewpoint and the landscaping to both the street and rear frontages of the site as proposed is worth having.

2. Relationship to neighbouring properties

In respect of Platinum Apartments and comparing to the appeal scheme Block A has been reduced in depth and the scheme is cut back at 3rd floor level. The distance between block A and the rear corner of Platinum Apartments has increased. The overall effect is to reduce the effects of block A in terms of daylight/ sunlight and outlook especially on the rear elevation of Platinum Apartments and on the parking area behind.

In terms of the outlook from all the properties to the North of the site the reduction of the height of Block B by one storey has significantly increased the available sky view for neighbours.

Block A on the frontage is now proposed at similar height to Platinum apartments. The proposed 'link' at one storey and the proposed Block B at two storeys above ground levels are now no more bulky or dominant in views from neighbours than the previous commercial premises were.

Overall we believe the current proposals have made a significant response to mitigate the inspectors appeal comments in respect of neighbour effects.

3. Design/ Height/ Layout

We are willing to consider stepping Block A away from Platinum Apartments although in streetscene terms this would open up a gap between buildings where a

continuity of frontage relationship as proposed would seem preferable. If necessary to secure a recommendation for approval we could introduce parking bays in a gap. We are also willing to delete the Northernmost ground floor studio although we consider that this will not be unattractive to use (effectively similar to other ground floor frontage studios in having a street facing window) and would work particularly well in locating the resident student warden by the building entrance where information for and oversight of the students on site can be readily provided.

4. Natural Environment

We agree that tree planting choice will need careful consideration to suit the limited space and are entirely willing to discuss this in more detail. This issue can be controlled by condition. It would have been our preference to achieve proper 'boulevard' tree planting with street trees comparable to those introduced by RBC within the highway further along the street to the South but highways opposition to street trees on front of our site has required us to bring them back into the scheme boundary where they will necessarily be smaller ornamental species. Maybe a better solution (at my clients expense) could be to have a couple of trees in 'pavement build outs' into the carriageway between parking bays if your transportation colleagues could accept this?

5. Transport Comments

I made a response in May justifying the arrangements as proposed. I understand that a further response/ comment on this from your Transport colleagues is awaited. As above if Block A is moved away from Platinum Apartments it may be possible to provide an off-street bay should this be seen as absolutely necessary.

Our overall position in respect of Transport is that this is a no-car student scheme which will operate in conjunction with no.79 (we can confirm this by condition or S106) sharing the manager based there. As such there is no need for off street parking for any daily needs of the proposal. The very infrequent events of student start and end of year arrival/ departure would be programmed and supervised at off peak traffic times and using the off street parking bays available at 79 (as well as available on street parking in front of the site itself).

The site currently has three pavement crossings into it (two for 40 and one for 62-68) with associated 'no parking' zones across the entries. These will be removed as a consequence of development thus allowing extra parking (or servicing) bays to be available on the street frontage. It is a matter for the highway authority as to whether this freed space is used for additional on street parking, for defined servicing, or for street trees. My clients are willing to fund any necessary costs of any of these that the planning/ highway authority consider appropriate.

6. Need

It is a fallacy to plan on the assumption that only first year students 'need' Purpose Built Student Accommodation (PBSA). All students need a home and in practice it is evident across the UK that when there is a choice available between PBSA and market rental (in practice often HMO) properties a growing proportion of upper years students will choose the qualities, support and 'all-inclusive' budgeting of PBSA accommodation. In any case the growing overall need for accommodation for upper years students must be factored into Reading's housing provision numbers whether as additional PBSA or as additional general housing allocations. From a planning viewpoint PBSA is a particularly effective way to use land with relatively intensive accommodation often in or close to town centres where associated

economic benefits are evident. PBSA provides management standards and control of student behaviours.

Experience in cities where higher levels of PBSA have been sought and achieved by planning authorities is that there is associated reduction in student pressures and in several cases 'destudentification' of older existing residential streets. This generally involves a reduction in student demand for HMO and other homes releasing private rental and home purchase availability (often at lowered prices) for other residents.

The proposal is for a premium PBSA scheme close to the Town Centre. There is a strong market demand for such housing, notably from overseas (particularly Chinese) students, from postgraduates and other older students. The student homes would be in a highly sustainable location. It is not the role of planning to preclude the choice of such accommodation from students. We can provide information in respect of proposed rental levels should you require but I am unclear how this would be relevant to planning?

My clients are in dialogue with the University of Reading and will ensure that the scheme fully meets the University's quality standards and can be scheduled as available approved accommodation accordingly. They note however that the University has a commercial role in providing student accommodation which is not always quite the same thing as its strategic wish to ensure the growth and attractiveness of the University. In these circumstances it would be anti-competitive and inappropriate for the Local Planning Authority to require that only those PBSA schemes that are on University Land or promoted with a formal partnership involving the University should be allowed.

I would be grateful if you will draw the Committee's attention to the above responses when this application comes before them in September.

APPENDIX 2: DESIGN REVIEW PANEL RESPONSES - received 30/4/19

Site
<p>Overall Height + Street Scene:</p> <p>An additional storey has been added to Silver St, the DRP are generally comfortable with the principle of the additional storey, however would like to see the pitched roof reduced in height even more than shown currently to drop the height of the form.</p> <p>The corner junction of the brick parapet and gable edge should be reduced by creating a continuous brick parapet line around the building. The gable face could be set back slightly and clad in the roofing material to make this corner less jarring.</p> <p>The panel discussed that the amended roof form of Block B looks much more in keeping with the surrounding context. The dropped roof level will allow increased light in the courtyard particularly in the afternoon/ evening.</p> <p>Comments were made by the DRP regarding the revisited bays which are considered to be slightly more muddled than the previous design on Block A with the initial triplet concept lost. Perhaps revisiting the widths of the windows and openings will help this elevation appear better proportioned alongside reviewing the widths of the bays to ensure they are all consistent in width. The treatment of the glazing should also remain consistent on both stair cases.</p>
Building
<p>Staggered Rear Building Line Block A:</p> <p>The building steps back minimally on several levels which results in an over complicated rear facade to block A. More thought needs to be given to this and simplifying the number of setbacks on this elevation while still allowing enough light into the space should be considered.</p> <p>The shift in the building plan on Block A is not necessary, a cleaner elevation will be created along the street and courtyard elevations if this all aligns. This will give more spacing back to the rear courtyard if the central section of the shift moves towards the street to line up with the end portions. All the studios on ground floor can terrace back on block A in the same line giving back more space to the central courtyard.</p> <p>The angled windows looking onto the courtyard bring another concept into the scheme, and although overlooking needs to be considered creating these in a brick material would reduce the number of materials and ideas being introduced across the back elevation.</p> <p>The distance between Block A and B within the courtyard is 12m² at the smallest point and increases to 15m² as this widens when the building steps away in section from the lower ground floor. As Block B has now been reduced in height, this distance between the two blocks is deemed sufficient.</p>

Design Approach

Removal of Studios at Lower Ground:

The removal of the studios on the northern boundary replaced by common room areas onto the external amenity space will activate this area much more and connect with the courtyard.

Careful thought needs to be given so that there is separation (defensible planting and level changes) between the student rooms and the public the courtyard at lower ground floor. In a similar way to how a house is separated from a street, the people using the courtyard should not be able to walk up to or sit directly outside student's bedrooms.

On the north west corner at Lower Ground floor the externally accessed studio next to the stair and amenity area is poor quality design and should be removed. As it is sits under a walkway + canopy at lower ground level there will be poor light levels into the space. Additionally there is no defensible space separating the studio from what is main thoroughfare within the building.

Additional student rooms have been added onto the link at ground floor level. As a form, these studios create a block on the link visually connecting Blocks A and B. The link may be more legible if these studios are read as a separated form (set apart from A +B) which pop out of this link level.

The way these studios are accessed needs to be considered (similar to the comment on lower ground floor area) so there is adequate defensible planting and separation from the main thoroughfare directly outside the rooms, perhaps via a gate and a recessed shared entrance. Decreasing the number of studios along this link may help.

The studios in this area should be internally planned so bathrooms are moved to the back of the space to increase light levels and open areas around the windows, top lighting will further increase light in these spaces.

The DRP suggested the corner studio adjacent to the front entrance and accessed off the main lobby will need to be removed or significantly reconsidered as this as is fully surrounded by service spaces (service zone for bins/bikes) and the front door opens directly onto the main entrance space in the building which will be noisy.

The DRP commented that the long external corridor adjacent to the common room space needs to be reviewed as this will have no passive surveillance and although this is an enclosed development won't feel safe. Perhaps some glazing to the common room into this zone could be introduced.

APPENDIX 3: PLANS

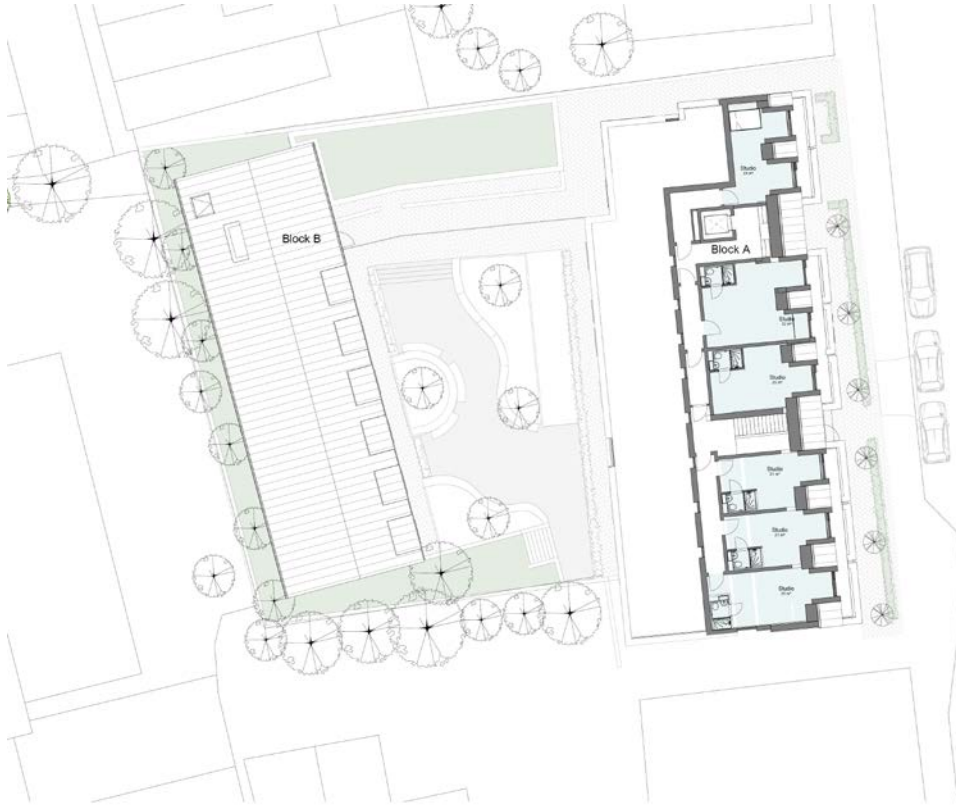


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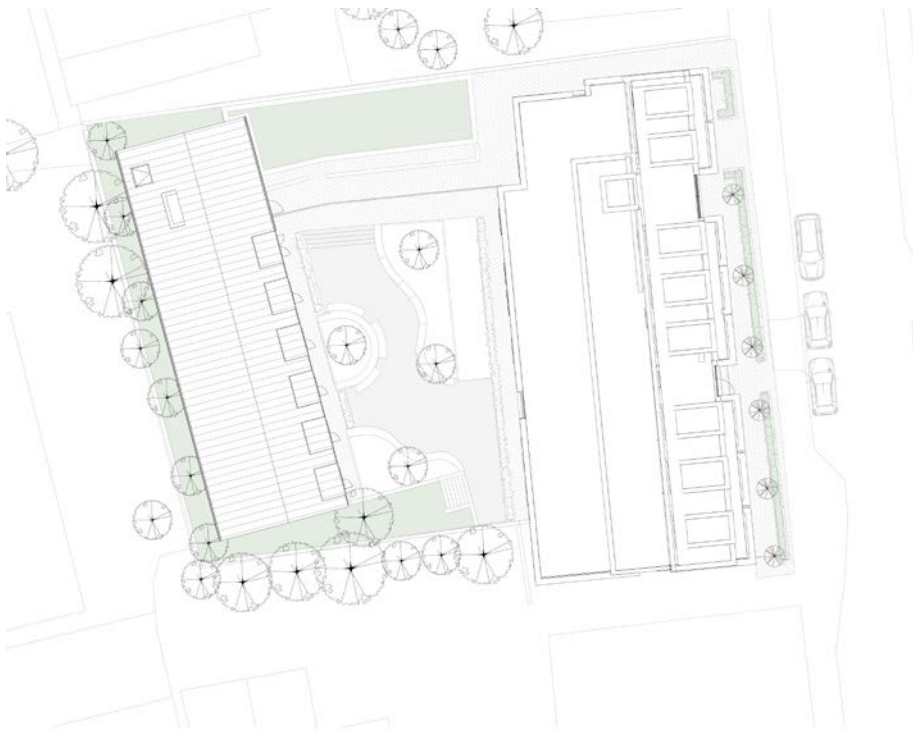


1 Level 0
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Level 3
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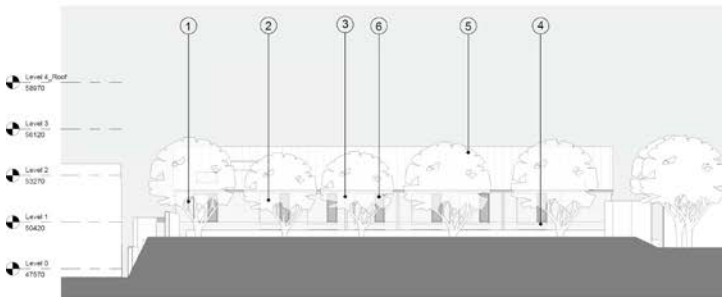
1 Level 4_Roof
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2 Street Elevation - Silver Street long elevation
1 : 200



1 Street Elevation - Silver Street
1 : 100



1 Elevation 4 - Block B West
1 : 100



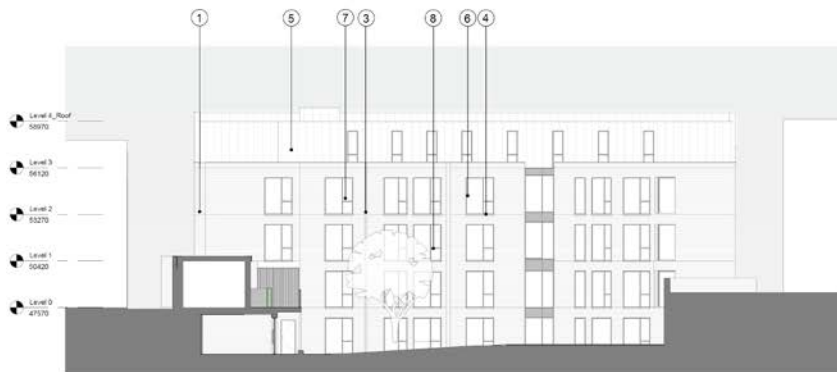
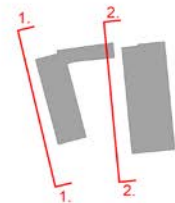
Notes:

- All dimensions are in millimetres unless stated otherwise. No 10 dimensions are to be rounded up.
- All dimensions are to be rounded up.
- The building is to be constructed in accordance with the Building Code of Australia (BCA) and the relevant standards.
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- Copyright of this drawing and all the information it contains is the property of the architect and is to be kept confidential.

External Finishes

Ref. Description

1. Fair Faced Brick
2. Feature/recessed Brick Panel
3. Recessed Joint in Brick
4. Brick Cill
5. Standing Seam Zinc Roof
6. PPC Aluminium Window
7. PPC Aluminium Ventilation Louvres
8. Glazed Balustrade



2 Elevation 2 - Block A Courtyard
1 : 100

PLANNING

Silver St
Developments L

CREC

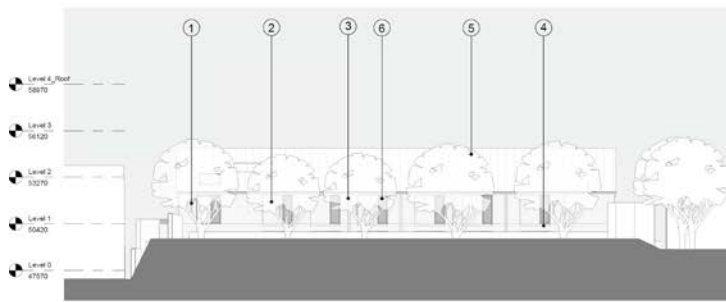
Project No. Elevations - Sheet 1

Site No. 40-68 Silver Street, Reading

Scale: As indicated @ A1

Drawn: 15/04/17

Check: PL_200



1 Elevation 4 - Block B West
1 : 100

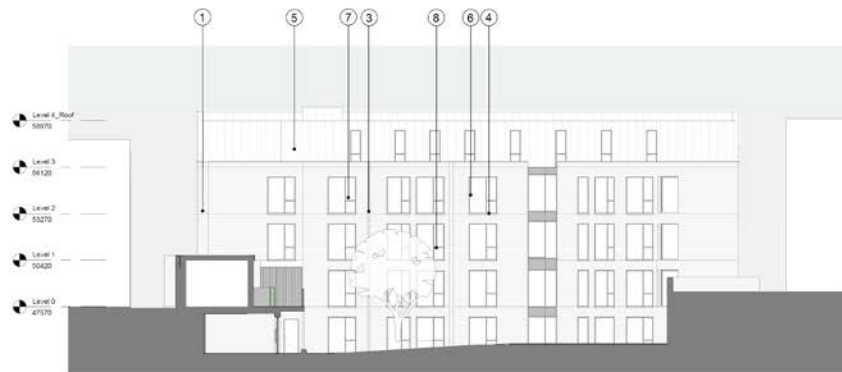


External Finishes

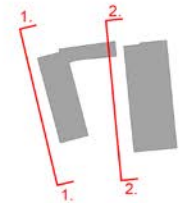
Ref. Description

1. Fair Faced Brick
2. Feature/recessed Brick Panel
3. Recessed Joint in Brick
4. Brick Cill
5. Standing Seam Zinc Roof
6. PPC Aluminium Window
7. PPC Aluminium Ventilation Louvres
8. Glazed Balustrade

Notes:
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2 Elevation 2 - Block A Courtyard
1 : 100



PLANNING

Silver St Developments Ltd

40-68 Silver Street, Reading

10/04/17

PL_200



5 Elevation 5 - South
1 : 100



External Finishes

Ref. Description

1. Fair Faced Brick
2. Feature/recessed Brick Panel
3. Recessed Joint in Brick
4. Brick Cill
5. Standing Seam Zinc Roof
6. PPC Aluminium Window
7. PPC Aluminium Ventilation Louvres
8. Glazed Balustrade

Notes:
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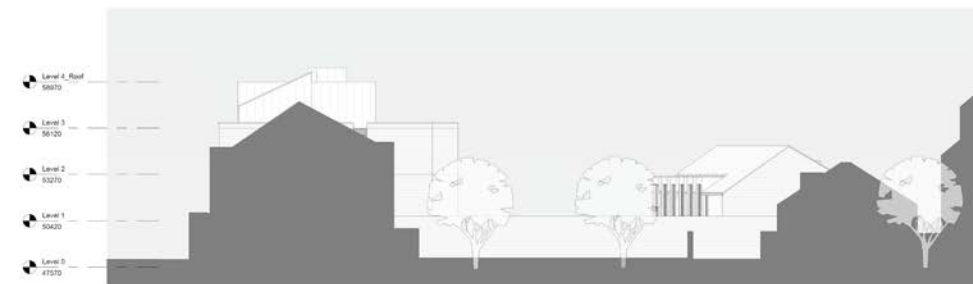
PLANNING

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10/04/17

PL_200



6 Elevation 6 - North
1 : 100