



Reading
Borough Council
Working better with you

Eve Ladden Timbers
Planning Associate
Barton Willmore
7 Soho Square
London
W1D 3QB

Via email only to Eve.LaddenTimbers@bartonwillmore.co.uk

ADVICE WITHOUT PREJUDICE

Your contact is: **Mr Jonathan Markwell, Planning**

Dear Mrs Ladden Timbers,

TOWN AND COUNTRY PLANNING ACT 1990

Enquiry Reference & Address: 181724/PREAPP - SSE, 55 Vastern Road, Reading, RG1 8BU

Proposal: Redevelopment proposal to demolish a number of structures & erection of a series of buildings to form a residential scheme (2-11 storeys) of 246 residential units, including a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road towards Reading Station.

Pre-application meeting number: 1 (following a scoping meeting on 09/11/18)

Information considered: Pre-application enquiry form; 'River Gate, Vastern Road, Reading-on-Thames', by Broadway Malyan, Ref 33440-07 Rev K, as received 14/11/18 (which updated Rev J received on 02/10/18).

Those in attendance at the pre-application meeting: Jonathan Markwell (Principal Planning Officer, Reading Borough Council); Jonathan Mullis (Historic Buildings Consultant for Reading Borough Council); Darren Cook (Transport Development Control Manager, Reading Borough Council); Sarah Hanson (Natural Environment Officer, Reading Borough Council); Eve Ladden Timbers (Barton Willmore); Katy Walker & Angus Cook (Berkeley Homes); James Cook & colleague (Broadway Malyan); James Weeks (The Built Heritage Consultancy Ltd); Glen Macfarlane (Macfarlane Associates); Dan Townsend (Peter Brett Associates).

Input from other officers, albeit not in attendance at the meeting: Giles Sutton (Ecology consultant for Reading Borough Council); Lynne Reynolds (Policy and Project Officer - Leisure and Recreation); Rebecca Moon (Senior Environmental Protection Officer).

Thank you for your recent enquiry in relation to the above site. This written note of advice follows pre-application meeting 1, as held on 21/11/18. Prior to this meeting an initial scoping meeting took place on 09/11/18 and a pre-application Planning Performance Agreement (PPA) is in the process of being entered into.

Giorgio Framalico
Head of Planning, Development
& Regulatory Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787

Our Ref: 181724/PREAPP

Direct: ☎ 0118 9372458

e-mail: jonathan.markwell@reading.gov.uk

5th December 2018

General advice / introduction / background

This written note provides a summary of the matters which were discussed at the first pre-application meeting. In advance of the meeting the agenda confirmed the main topics for discussion were:

- Principle of development/demolition
- Initial design concept,
- Bulk, scale and massing
- Public Realm and Landscaping
- Highways and Parking Overview
- Confirmation of supporting reports

Any planning application at the site would presently be considered within the context of the Council's LDF Core Strategy (2008, Altered 2015), Reading Central Area Action Plan - RCAAP (2009) and Sites and the Detailed Policies (2012, Altered 2015) documents. In addition, in this case the Reading Station Area Framework (2010) would also be relevant. Other topic based supplementary planning documents would also be applied where relevant, together with national policy and guidance (the NPPF and PPG). Please use [this link](#) to view the local policies and guidance.

You will already be aware that a new local plan for Reading is at an advanced stage, although adoption of the [new local plan](#) (and its policies - replacing the existing policies referenced above) is not anticipated until at least the beginning of 2019 at present. It is also advised that the emerging policies can be afforded some weight in the determination of planning applications now that the draft local plan has been submitted to the government (The Local Plan was submitted to the Secretary of State on Thursday 29th March 2018) and that the examination in public has taken place (September-October 2018). This weight is limited at this time, but will increase in weight as the plan moves closer to adoption. Once adopted, the new policies will be afforded full weight and will supersede the Core Strategy / Central Area Action Plan / Sites and Detailed Policies.

The site/immediate surrounding area has a number of planning constraints / designations including (in no particular order):

- Part of the RC1g site designation within the Station / River MOA (and emerging CR11g site)
- Within the central core of the RCAAP
- Within the office core of the RCAAP
- Detailed as part of a key corridor of movement at figure 6.2 of the RCAAP
- Detailed as an approximate location of potential new open space at figure 6.2 of the RCAAP
- The entrance building is a designated (from 22/05/17) locally important building (ref LL8)
- Within Flood Zone 2 & 3
- Within an air quality management area

- Within a smoke control zone
- Includes contaminated land
- Adjacent to a public right of way along the river
- The River Thames, Christchurch Meadows, Kings Meadows and Hills Meadow are major landscape features
- Christchurch Meadows, Kings Meadows and Hills Meadow are important areas of open space
- From an ecological perspective the site backs on to the River Thames which constitutes a Priority Habitat 'Rivers' (as per the NPPF)
- The River Thames is an existing green link
- There are mature Plane trees on the Vastern Road frontage
- Within Abbey Ward

As such, this is evidently a constrained and sensitive site and location. Firstly, it is naturally welcomed that pre-application discussions are beginning on an allocated site (and a series of pre-application meetings would be expected and needed for a site of this nature), albeit it is somewhat surprising and disappointing that this proposal only relates to part of the site allocation. The splitting up of the site potentially makes any proposal even more complex. Furthermore, on first glance, it appears that the emerging proposal is extremely ambitious in its nature and scope.

Hereafter, the main topics discussed at the meeting are discussed in-turn, incorporating comments from specialist officers where relevant (acknowledging that there is some overlap in some areas):

Principle of development/demolition

In terms of the loss of the existing office use/floorspace at the site, it will be expected for some succinct commentary (supplemented with photographic evidence) to be provided in line with the criteria at Policy CS11. Given that the wider site is allocated for residential (as the main use), it is considered likely that officers will be able to accept the justification to be submitted. Nevertheless, this information still be required to be submitted for consideration in this regard and the onus is on you to provide this.

Turning to consider the proposed land uses, the principle of residential accommodation at the site aligns with the main land use identified by the wider site allocation. Accordingly, there are no in-principle concerns with a residential-led redevelopment of the site, should the loss of the existing office use (as detailed above) be justified.

It is however also noted that Policy RG1g refers to some small-scale offices and leisure also being appropriate at the site. Emerging Policy CR11g again references some small-scale leisure (indicative potential stated as 1,000-2,000sqm) and complementary offices (indicative potential stated as 'no significant net gain') also being acceptable. Based on your submission it would appear that no provision has been made for either leisure or office uses on site. It is advised that you fully explore the inclusion of these additional uses, in line with the adopted and emerging policy context, in order to provide animation of this route. If you subsequently

do not seek to provide these uses, detailed commentary and justification for the reasons for this should be submitted for consideration at a later pre-application meeting.

Moving on to consider the principle of demolition of the existing buildings/structures, only an external inspection of the site has been undertaken to date; no access within the site or into the existing buildings/structures has been undertaken by officers. It is within this context that this advice is provided.

As you are already aware the entrance building is locally listed and your proposal is, put simply, seeking its demolition. In this regard your submission makes reference to an initial heritage statement (not submitted in full for this pre-app) which details the building as being much or somewhat compromised, that the proposals incorporate references to the existing building and that there is a need to take a 'balanced view' in the competing demands against significant public benefits.

Input has been received from the RBC Historic Buildings Consultant. Although his full comments (detailing the policy/guidance context) are outlined at Appendix 1 below, in short, at this juncture (i.e. based on the information submitted) it is evident that the proposed development would disappointingly result in the demolition of the locally listed building. Moreover, it is also considered that this would amount to substantial harm to the locally listed building. Furthermore, greater weight should be afforded to the conservation/preservation of this non-designated heritage asset in the planning balance. Accordingly, significant concerns are raised with the demolition of the locally listed building.

It is also interesting to note that, within the past week, an appeal elsewhere in the Borough ([3-5 Craven Road](#)), also seeking the demolition of a locally listed building, has been dismissed partly on this basis.

As such, should you continue to seek to demolish the locally listed building it is considered that full / comprehensive justification will be required. As part of this you should also explore options which retain the building and incorporating it within your emerging proposals (possibly as a gateway to the public route through the site to the river). It is acknowledged that this would have knock-on implications for the remainder of the site; but the full methodology which has led you to arrive at your preferred option should be re-visited and explored further, so officers can give this appropriate consideration. To be clear, officers would however far prefer you to retain the existing building (and incorporate it as an integral part of your scheme) as part of your emerging proposals.

In addition, it is also noted at this initial stage that the intended proposal, to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block, is not considered to have any heritage benefit within the terms of Reading LDF Policy CS33. It is considered to be an abstract interpretation which would not be recognised by a casual observer, nor arguably by a more informed observer either.

Initial design concept / Bulk, scale and massing (and related matters as a result)

Considering the part 5, 6, 8 & 11 storey apartment blocks fronting Vastern Road first, concerns are raised that these are overwhelming in scale, in the context of the existing prevailing character. In particular, concerns about the increase in scale between the Victorian terrace to the west and the proposed 5 storey block (adversely impacting on the properties on both Vastern Road and Lynmouth Road, with the proposal being two storeys higher than existing and the footprint potentially being closer too - the footprint / massing of the existing buildings could be used as a possible basis to seek to demonstrate the appropriate scale at this point). Concerns regarding the general scale of this element continue further east too. For example, the 4/5 storey blocks to the east of the site are set well back from the Vastern Road frontage, unlike the proposed footprint (which appears to be significantly closer than the prevailing context). As such, the substantial increases in height proposed, appear out of context with the prevailing scale and lack a design based rationale. Although it is acknowledged that any redevelopment proposal would seek to increase the scale at this point in comparison with existing, little reference to the Reading Station Area Framework appears to have been made. Put another way limited justification for the heights proposed, far in excess to those noted in the Reading Station Area Framework, has been submitted. Based on the information provided it is considered that the scale and massing of these apartment blocks should be reduced considerably.

In addition, the form of the apartment blocks appear bland (officers would expect a site of this nature to be of the highest design quality) and do not appear to actively engage with the street (unlike the Victorian terrace to the west, e.g. no active frontages are proposed, with standardised apartment entrances provided instead, rather than a series of front doors for individual ground floor units with front amenity spaces).

Turning to consider the 2/3 storey houses along the western boundary of the site, although the principle of providing such an element within your scheme is broadly welcomed (in the context of the north-south pedestrian route and the presence of Lynmouth Road to the east), serious and significant concerns are raised with the footprint of these units. The resultant depth of the rear amenity areas to the boundary with Lynmouth Road properties is only 2.5m-3m, which calls into question the outlook (and subsequent sense of enclosure) from the ground floor for future occupiers.

Furthermore, the back-to-back distances of the buildings (to the rear of Lynmouth Road properties) range between 10m-13m, which is far below the 20m standard specified in Policy DM4. The existing context of the front to front distances between Lynmouth Road properties (built in a different time) is not considered a suitable basis for seeking to justify these obvious and serious shortfalls of the emerging proposals. The resultant proposals are likely to be visually dominating and overbearing for the existing and future occupiers of properties along Lynmouth Road at the distances shown, regardless of the measures you outlined may be incorporated in an attempt to reduce the impact (angle of the roof pitch / single aspect to

the east to avoid overlooking to the west). Daylight, sunlight and overshadowing would be another factor which would need to be justified/evidenced through a full BRE-based methodology assessment (which would be independently reviewed on behalf of the local planning authority at the time of any future application, as funded by the applicant).

Continuing on from the fact that you outline that these units will be single aspect facing east, it is noted that the distance to the east (until one reaches the next proposed building) across 'the avenue' is 14m-15m (again significantly below the 20m usually expected). As such, concerns are raised over the poor standard of accommodation created for future occupiers (for example - single aspect units, overlooking at 14-15m distances, potential deficiencies in day/sunlight). Accordingly, at this point, although the principle of a terrace of properties appears in principle to be a suitable response, the constrained size/shape of the red line boundary means in practice it will be a significant challenge to persuade officers that these units will be suitable in themselves and not result in a significantly detrimental impact to the living environment of existing nearby residential properties, or future occupiers themselves. Put simply, owing to the extent of the red line boundary, the units as shown would be likely to be deficient in numerous areas. Furthermore, this is considered to be indicative of the wider overarching concern with the proposals at present, that they represent a significant overdevelopment of the (highly constrained) site.

Substantive concerns are also raised in relation to the overall massing of the 7/9/11 storey apartment blocks fronting the River Thames, particularly within the policy context of CS8 (Waterspaces), CS37 (Major Landscape Features and Strategic Open Space) and DM17 (Green Network), as well as the main MOA / design policies. Put in its simplest terms, the scale appears dominant, imposing and oppressive to the river, causing significant harm in this most sensitive setting. Based on the information provided you are strongly advised to reconsider the scale and massing at this point, with it suggested that this should be significantly reduced to be more harmonious in its surroundings.

Separate from this point, concerns are also raised at this juncture with the 16m width of the 'residents gardens' enclosing these blocks, from a potential perspective of overlooking (again below 20m) and day/sunlight levels to the lower floor and corner units in particular. There are also further concerns raised by the Natural Environment Officer and RBC Ecology Consultant in terms of this block, as detailed separately below.

Continuing on from the initial massing concerns, the interaction with the river and the existing Christchurch Bridge is also critical. This is in terms of activating the frontage, while also providing a sufficient setback to provide a buffer and relief to the massing. Moreover, the bridge at present does not provide a link into the site for all persons; it can be accessed via steps, but for a cyclist, disabled person or use a push chair a detour of 160m is required. In line with the Council's policies you are advised that officers consider it essential for the

development to provide a direct (step-free) link between the site and the bridge, which meets the gradient requirements within DfT document, 'Inclusive Mobility'. Various options should be explored and put forward for future discussions with officers at subsequent pre-application meetings.

It is acknowledged that any such option is likely to significantly alter/reduce the footprint of the proposed block fronting the river. However, it is considered that in this instance the proposals need to provide suitably direct / easily accessible north-south pedestrian links first, together with a meaningful area of public open space (as required within the policy context - see separate comments elsewhere in this advice for more details) with the layout/footprint of buildings following thereafter. This is in direct contrast to the approach which you appear to have taken to date, which appears focused on a quantum of development to the detriment of all other considerations.

Another linked significant concern involves the north-south route through the site being reliant upon the future separate proposals on the sites to the south of Vastern Road (not under the ownership of the prospective applicant). Furthermore, the route proposed may not satisfactorily align, thereby potentially not facilitating the required direct link between the river and station (as detailed by all local policy documents and guidance). It is considered essential that the emerging proposals are progressed with discussions with the landowners to the south to ensure that a fragmented patchwork of contrasting proposals do not emerge. There are also fundamental questions revolving around how/where pedestrians cross Vastern Road, as detailed in the transport section below.

In addition, in terms of 'the avenue' itself, it is questioned how much this engages with the proposed units at ground floor level (which is required to assist placemaking). The entire length of 'the avenue' to the east is shown to comprise vehicular parking, bins and cycles and the potential space for public art. A significant proportion of the western side of the avenue appears to be given over to space for private garage parking. Such features would potentially result in little day-to-day activity/natural surveillance of the avenue at ground level. This could have knock-on consequences for the actual function/success of the route. Naturally the crime prevention design advisor (CPDA) at Thames Valley Police can be engaged in subsequent pre-application discussions to assist in this regard, together with considerations in relation to the wider site.

Many of the above points link in with another significant officer concern, that only part of the site allocation is emerging, and that the most direct pedestrian link between the station and the river (and vice-versa) through the site is actually via land in the wider allocation (which you outline to be outside of your ownership). To avoid a missed opportunity for all parties you are strongly advised to further explore bringing forward the site allocation as a whole in a single scheme. If justification can subsequently be provided to suitably demonstrate that

this is not possible in the short/medium/long term, then it is advised that you should also explore the site area increasing (over and above the existing red line) in any way possible. For example, can elements of the essential infrastructure be retained (and in practice be unaltered), but your proposal build over / around these areas on higher levels? It is noted that during the meeting you advised that prohibitive costs were involved in this regard, but it is nevertheless sought to be reappraised and demonstrated to officers in future meetings.

It is also advised at this earliest of opportunities that officers consider that your future proposals should be subject to pre-application review(s) by Design South East (D:SE). Obviously our future discussions can ascertain the appropriate time for input from D:SE to be sought. Owing to the above advice, it is considered premature to seek D:SE at this juncture.

As a result of all of the above, you should be under no illusions that officers have significant concerns with virtually all elements of the scale, massing and footprint of the buildings sought. It is considered that significant changes to the approach are likely to be required in order to bring forward a suitable scheme.

Public Realm and Landscaping

Observations from the Natural Environment Officer, RBC Ecology Consultant and Leisure and Recreation officer (within the Parks team) have been received to help inform this section of the feedback. The individual observations are detailed below in turn:

Observations from the Natural Environment Officer:

Notwithstanding the site/surrounding constraints identified at the outset of this advice, to re-emphasise matters from a trees and landscape perspective there are a number of constraints on and around the site which require due consideration, such as impact on:

- The River as an existing green link
- The River as a Major Landscape Feature
- Christchurch Meadows as an Important Area of Open Space
- Mature Plane trees on the Vastern Road frontage
- Policy CR11g Riverside includes a potential area of open space at the riverside
- The need to provide a north-south pedestrian link from the Station to the river
- Chapter 5 of the Reading Station Area Framework identifies ten key public realm priority projects - with 3 crossing over the site (the Kennet - Thames spine; the Riverside Path & Water Spines; Riverside open space)

Whilst the proposal does include an offset from the river, any benefit of this is lost due to the scale of the buildings. When viewed from both Vastern Road and Christchurch Meadows, the proposal is considered to present a vast scale of building frontage that is not in scale with adjacent houses or office buildings. A more appropriate building height with open space on the north of the site, to provide a buffer, should be considered and explored in future

discussions. This would give an opportunity for further tree planting on the riverside, which is currently lacking, in line with objectives of our Tree Strategy (the river being a treed corridor).

The proposals include 'The Avenue' providing the required pedestrian link in the form of a landscape 'street' approx. 16m wide. This effectively forms a 'public space', so should not be included as 'open space for residents'. It is noted that the visuals indicate tree planting along The Avenue in Planters, which is of potential concern in relation to soil volume, species choice and maintenance. It would be useful to understand why planting in the ground is not indicated?

The mature (Council) Plane trees on Vastern Road are shown to be retained, as one would expect given they are off-site. It is however advised that arboricultural input will be required to demonstrate how the trees and their root protection areas (RPAs) can be successfully retained and protected during large scale development.

The submissions provide very little detail on landscaping proposals, just an indicative layout. Whilst it is appreciated this is a first pre-application (within a series of future meetings), some landscape principles would be useful. In light of the other concerns raised regarding the layout/scale of development, it is strongly suggested that landscaping design is an integral part of your further options for the site.

Observations from the RBC Ecology Consultant:

The site backs on to the River Thames, which constitutes a Priority Habitat 'Rivers' (as per the NPPF) and forms a significant green link through Reading. Paragraph 174 of the NPPF states that plans should safeguard and enhance "wildlife corridors" and "ecological networks", which would in this case include the River Thames. In addition, as per Policies CS8 (waterspaces) and CS36 (biodiversity) of the Core Strategy, as well as CR11g (riverside opportunity area) of the submitted New Local Plan, development should protect and enhance important wildlife areas and green links.

Risks of proposed development to protected wildlife include:

- Pollution (surface water runoff, dust, noise, littering etc.) during and post-construction
- Over-shadowing of the River Thames
- Excessive illumination by new external lighting to the River Thames and other wildlife-sensitive areas
- Increased footfall to the River Thames
- Disturbance of nesting birds/destruction of nests during the development
- Disturbance of roosting bats/destruction of roosts during the development
- Disturbance to/damage to resting place of other wildlife, such as water fowl and water voles

Unmitigated, the above risks would lead to an unacceptable deterioration in the quality of the Priority Habitat and also a loss of biodiversity. Accordingly, you will need to demonstrate to the Local Planning Authority how protected wildlife will be affected, and how any impacts

will be mitigated or compensated for. Therefore, it is recommended that the results of an ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) as well as any relevant mitigation and a biodiversity enhancement strategy are submitted with the full application. Alternatively, such details could be submitted for further assessment at pre-application stage should you wish. Further details are given below:

Survey requirements

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation, such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey protected species.

Extended phase 1 habitat & protected species scoping survey

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

Phase 2 ecology surveys

If the surveys show that the site contains habitats suitable for protected species then further surveys for species such as bats may need to be carried out.

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of the buildings or trees to be removed are thoroughly searched for bats and signs of bats; this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats then further surveys will not be required. However, if bats are found or if the building and/or trees have features suitable for use by roosting bats, further emergence and or dawn surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) may need to be carried-out to confirm the presence or absence of bats and if bats are present to establish the characterisation of the roost and mitigation requirements.

Policy

The above ecological information would need to be submitted prior to the determination of the full application, as Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission

is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

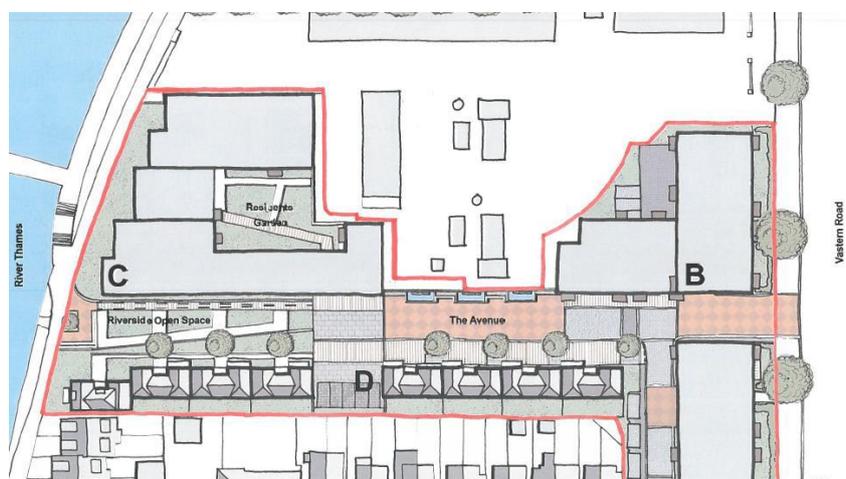
Scheme layout

The scheme has very tall buildings adjacent to the river with large glass windows, see below:



This is likely to result in significant light spillage onto the river which may adversely affect wildlife (such as bats). It is recommended that the scheme is redesigned in order to minimise any light spillage onto the river as at present it is unlikely to be acceptable.

The scheme also has very little open space adjacent to the river with the open space set back behind the large blocks.



This means that the open space does not contribute to the functionality of the river as a green link and consideration should be given to an amended layout with the green space adjacent to the river (as per the policy designation).

Observations from the Leisure and Recreation officer within the Parks team:

As with all large scale developments, from a leisure point of view, there are a number of potential concerns. First and foremost, the public open space appears to be very limited.

Reading's overall amount of public open space is broadly in line with national guidelines, but it is unevenly distributed across the Borough and in particular, there is a shortfall in and around the town centre.

A development of this size would expect to yield the following:

- Local Area for Play (LAP)
- Locally Equipped Area for Play (LEAP)
- Neighbourhood Equipped Area for Play (NEAP)
- Multi-Use Games Area (MUGA)

It is also noted that the Station Area Framework references the potential for pocket parks to be opened up, as well as the MOA policy requirements for areas of open space on the site. With this in mind, it is simply considered that there is insufficient space provided within the current proposal to include anything that would practically be worthwhile for the residents. On-site provision of meaningful open space / play space will be expected in your revised proposals (taking into account various other elements of feedback in this note). It is important to avoid providing facilities that are tucked away in a corner and/or overshadowed by tall buildings, making them unattractive places to visit. There are obviously a variety of ways to incorporate open space / play space into the proposals and officers are keen for this to be frontloaded as far as possible.

The Avenue provides a north/south pedestrian and cycle route connecting the footbridge from Christchurch Meadows towards the station. However, it does not appear to be a space designed at providing recreational facilities for the public, nor its future residents. Further, The Avenue does not appear to widen sufficiently as it links to the river (noting that the adopted figure 6.2 MOA RCAAP map notes this specific area as an 'approximate location of potential new open space' and figure 5.3 of the emerging New Local Plan denotes this as a 'new area of open space'). It is also considered that hard landscaping should be reduced to a minimum to provide a green link through the development.

All residents in urban areas need access to parks, open spaces, sports pitches, places to walk, places to run, places to cycle, places to relax in or play. In the current era of high-density developments that reduce external amenity areas and open space, the need for proper open space provision, and safe and easy access to such spaces, is even more imperative. Consequently it is essential that new developments such as this make provision for open space to meet the needs of the residents/occupiers of the development. With a growing population resulting from new development, it follows that the amount and quality of open space in the Borough should increase over the plan period.

Wherever possible, additional public open space provision is essential to cater for the increased demand as a consequence of a rising population along with improvement to existing public open space. In addition to the on-site provision, it may be appropriate (subject to the extent of on-site provision) for an off-site leisure contribution to also be sought. This would potentially be to invest in nearby facilities in Christchurch Meadows and Hills Meadow.

Other comments

The principle of the inclusion of public art / cultural public art is welcomed and encouraged within the scheme/proposals. In terms of your intention to include the Dusseldorf 'cartwheeling boys' at the site, please note that this is earmarked to be retained/re-used within the future proposals for the Hosier Street area. This is most explicitly referenced in the Revised Hosier Street Area Development Framework, [as reported and discussed at the Strategic Environment, Planning and Transport Committee on 21st November 2018](#). As such, you are advised to explore other options as your public art inspiration at the site, perhaps linking in with historic uses at the site?

Highways and Parking Overview

All of the Council's current and emerging policies refer to an improved footway / cycle link between Christchurch Bridge and Reading Station; however the proposals currently do very little in this regard. As already outlined in a preceding section of this advice, the bridge at present does not provide a link into the site that does not require the use of steps or a detour of 160m approx., If you are a cyclist, are disabled or have a push chair. In line with the Council's policies the development must provide a direct link between the site and the bridge that meets the gradient requirements within DfT document Inclusive Mobility. You are advised to use this as a guiding principle for the future layout of the scheme.

It is also advised that the pedestrian / cycle link within the site should include a dedicated 3m wide footway / cycleway. At present the proposals include what appears to be 2m wide footways and connecting to a shared surface. This would not meet the Council's policy of providing a key movement corridor.

In addition to this it would need to be clarified in what form the footway / cycleway would continue to gain a direct link to Reading Station to the south in accordance with policy i.e. as a minimum how would the link gain access to the southern side of Vastern Road? This has already been touched on in a previous section, but it is considered that this would need to be included within any planning submission and it is likely that this may need to be provided by the developer. There are various options in this regard (e.g. ranging from additional crossings at ground level to more expansive options including raised platforms over Vastern Raod) and it is considered essential that these are fully discussed as part of the future pre-application discussions.

It must also be stressed that the site is located adjacent to a Public Right of Way and as such if a planning application is submitted all public rights of way crossing or adjoining the proposed development site must be marked on the plan and the impact of the Public Right of Way fully detailed within the Transport Assessment.

Vehicular access to the site is taken from Lynmouth Road, which currently serves as an exit only. Any planning application will need to assess the impacts on the Vastern Road / Lynmouth Road junction as a comparison to the existing use of the site. The access itself

appears to be a cross between a dropped crossing and a bellmouth and as such this access should be formalised as a bellmouth to make the priority clear to pedestrians.

Trip rate assessments will be required to establish the differences between the existing and proposed developments and the impact on the Lynmouth Road junction. It is envisaged that the exit onto Lynmouth Road would have generated limited movement given that vehicles within the site would be travelling away from their direction of travel on Vastern Road, exiting the site via the eastern exit would be more desirable.

Clarity is required of the precise car parking numbers for the site (once a revised proposal which takes into account other comments received in this feedback). Given the Town Centre and accessible location officers would be likely to accept a reduced provision providing this is justified by a clear methodology.

In line with the emerging Local Plan 10% of any car parking on the site should be accessible to electric charging points.

A car club provision will be required on the application site in line with the Council's Parking and Design Standards SPD.

Cycle parking should be provided in accordance with the Council's minimum parking standards.

Refuse storage should be located within 10m of where a refuse vehicle can get to and sufficient space on the site should be provided to allow for a refuse vehicle to enter and leave the site in forward gear. It will of course be required for you to demonstrate that such vehicles can manoeuvre within the site and also access it safely too.

Naturally a demolition and construction method statement would be required as part of any future permission and you should consider submitted this at application stage (if possible) to avoid a pre-commencement condition.

At the meeting it was mentioned that culverts existed close to the site. It is advised that measures should be taken to ensure that these are not impacted in any way during the demolition/construction phase.

Confirmation of supporting reports

Based on the information provided and the nature of the proposals, it is envisaged at this earliest juncture that the following documents would be required for any future application, in line with the [validation checklist document](#) (those elements marked in bold were not included in your list sent via email on 20/11/18):

All necessary part 1 requirements (including SuDS and the CIL form - in particular plans showing your methodology for how you have calculated the floorspace which will be CIL liable)

1. Affordable Housing Statement (if applicable)
2. Air Quality Assessment
4. Contaminated land survey & report
5. Daylight/sunlight assessment
6. Ecological survey and reports
7. Energy efficiency statements
- 8. Environment Impact Assessment (possibly, pending an EIA screening application)**
- 9. External lighting details**
10. Flood Risk Assessment
- 11. Heads of Terms Proposals - s106 legal agreements**
12. Heritage Statement
13. Landscape principles
14. Material details (within DAS)
15. Noise and vibration impact assessment
- 16. Open Space statement**
17. Planning statement
18. Plans and drawings - in particular please note the requirement for streetscene elevations, sections including site levels and finished floor levels stated on the plans, CIL methodology evidence plans. Furthermore, in this specific instance 3 sets of plans are required: existing, demolition and proposed.
- 19. Superfast Broadband Strategy Statement (can be included within a utilities statement)**
20. Sustainability statement
22. Transport Assessment & Travel Plans
- 23. Tree survey**
- 24. Utilities surveys and proposals**
25. Vehicle (car & cycle) Parking and Servicing (including waste storage and collection) details
- 27. Viability appraisal (if applicable)**

(please make use of the part 1 and part 2 checklists)

Furthermore, given the scale/nature of the proposals a statement of community involvement will also be expected. A microclimate (wind) assessment is also likely to be required owing to the scale of buildings proposed (this would be independently reviewed on behalf of officers at the time of any application, as funded by the applicant).

As pre-application discussions evolve, there may be the need for other information/documentation to be submitted (which are not included on the checklist), such as townscape and visual impact assessments.

Other matters

Initial observations from colleagues in the Environmental Protection Team:

For proposals of this nature, there will be potential Environmental Protection concerns in relation to:

- Noise impact on development
- Noise transmission between dwellings
- Air Quality impact - increased exposure / new receptors
- Contaminated Land - large / complex developments
- Construction and Demolition phase

Noise impact on development

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.

The new development will be exposed to noise from Vastern Road and also noise from the electricity substation if this is to remain. More specifically, it is known for example that the transformers produce a significant low frequency noise. Accordingly, an assessment will need to be completed (recommended to be carried out at the earliest opportunity) as the noise will need to be taken into account in designing the site layout and mitigation 'at source' may be required.

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.

It may also be appropriate to apply BS4142 when assessing the impact of noise from the substation.

Where appropriate, the noise assessment data should also include noise events (LAMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

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

Noise between residential properties - sound insulation of any building

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

Air Quality - Increased exposure

The 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 future application.

You will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.

More specifically, potential concerns are raised in this regard in relation to the possible inclusion of projecting balconies on the Vastern Road frontage, in particular at ground and first floor level (owing to the proximity to the busy Vastern Road). It may be the case that balconies serving the upper most floor units would be suitable from an air quality perspective (subject to this being demonstrated by you), but the lowest floors may struggle due to the existing context.

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.

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.

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

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.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development is located within to an air quality management area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

Mitigation against increased emissions:

- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant
- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Provision of cycling facilities / residents cycles
- Improvements to local public transport

It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, however, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

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.

Depending on the number of dwellings proposed - the applicant should submit an air quality assessment to determine whether the proposed development will result in a significant impact on air quality. The assessment must use a full dispersion model to predict the pollutant concentrations at the building façade for the proposed year of occupation as well as any impacts during the development phase. The input parameters used in the assessment must be agreed with a member of the Environmental Protection Team. Where the assessment identifies an impact on air quality a mitigation plan demonstrating sufficient mitigation to protect the dwellings from poor air quality must also be included.

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.

The development lies on the site of an electricity station which has the potential to have caused contaminated land and the proposed development is a sensitive land use.

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.

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.

Construction and demolition phases

Officers 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.

A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.

The hours of construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays.

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

Concluding remarks

In conclusion, based on the information submitted to date, there are considered to be a number of significant issues with your emerging proposals, which will more than likely necessitate fundamental changes to your future scheme. Officers will naturally seek to assist in providing further guidance and advice in seeking to address the present shortcomings, in order to bring forward through pre-application discussions a scheme which officers can hopefully support in the future. You should however be under no illusions as to significant constraints which exist on this site and that your present proposals appear overambitious in nature. In particular, the most fundamental concerns appear to be caused in part due to the red line boundary of your site. You are advised in the strongest terms to explore increasing the site area (as part of the wider site allocation - in discussions with SSE) to assist in seeking to address these issues.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council, in the event of a formal application for planning permission. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council.

Yours sincerely

Jonathan Markwell (via email only)

Jonathan Markwell
Principal Planning Officer

Appendix 1 - full version of the Historic Building Consultants observations in advance of the pre-application meeting:

Memorandum: Consultee Response			
TO:	Jonathan Markwell	Direct Line:	
FROM:	Jonathan Mullis	Ext No.	0118 946 7000
Consultee:	Historic Buildings Consultant	Dated:	14-11-18
Ref:	Pre-App 181724		
Proposal:	Re-development of part of the former SSE site		
Location:	Part of the former SSE Site, Vastern Road		
Consultee Response:	DWG / Doc Ref:		
Background			
Reading Borough Council guidance is provided in:			
<ul style="list-style-type: none">• Reading Station Area Framework (RBC, 2010)• Station Hill South Planning and Urban Design Brief (RBC, 2007)			
The <i>Station Hill South Planning and Urban Design Brief</i> (RBC, 2007) states that the wider area remained predominantly open land until the late 1800's when development encroached into the western parts of the area off Greyfriars Road and the livery stables adjacent to the station. In the mid-20th century, the centre of Reading was redeveloped. Areas of the historic core of the town were demolished to provide offices and shopping precincts. The construction of the Inner Distribution Road (the A4155), which started in 1969, improved traffic circulation but divided the town in half.			
The <i>Reading Station Area Framework</i> (RBC, 2010) identifies listed buildings, including Grade I and II* buildings, as well as the Market Place/London Street Conservation Area, Forbury Gardens (a historic park) and the Abbey Ruins (a scheduled ancient monument) as close to the area. The opportunities for enhancing the setting of historic assets are identified as, in the main, south of the railway.			
Reading Borough Planning Policies			
The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the			

Historic Environment states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

Within paragraph 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

RC5: DESIGN IN THE CENTRE

Applications for development within the Reading central area should demonstrate the following attributes:

- *Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;*
- *Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscape, public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;*
- *The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;*
- *Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety.*

Reading Borough Council Planning Policy

Within para. 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

Policy CS7: Design and the Public Realm relates to the general design of development within the borough and 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. This can be achieved through the layout, landscape, density and mix, scale and architectural detailing and materials. The policy notes that development will also be assessed to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough.

National Planning Policy Framework (NPPF) 2018

In March 2012, the Government published the National Planning Policy Framework (NPPF), which replaced the

National Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The NPPF was subsequently updated in 2018. The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '*...protecting and enhancing our...historic environment*' (DCLG et al, 2018).

The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2018, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2018, Annex 2: Glossary).

The NPPF identifies heritage assets as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

The glossary annexed to the NPPF defines the setting of a heritage asset as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

The NPPF (paragraph 189) requires that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 190 states:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 191 states:

Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Paragraph 192 of the NPPF states that, local planning authorities should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

Paragraph 193 states that:

*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is **irrespective** of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*

Paragraph 194 states:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 195 states that:

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Paragraph 196 states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 197 states that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 199 states:

Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Planning Practice Guide (PPG)

The Planning Practice Guide (PPG) (2014) clarifies this additional requirement under 'What is the main legislative framework for planning and the historic environment?' where it states that:

In addition to the normal planning framework set out in the Town and Country Planning Act 1990....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan. (See ID 18a-002-20140306).

PPG states that local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).

The PPG states under 'Why is 'significance' important in decision-taking?' that:

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Under the discussion of 'How to assess if there is substantial harm?' the PPG offers:

What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

The PPG states under 'What is the setting of a heritage asset and how should it be taken into account?' that:

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we

experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).

Historic England Good Practice Advice

Historic England has produced guidance on the interpretation and implementation of the NPPF and PPG with regard to the historic environment in the form of:

- Historic Environment *Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Historic England, 2015a);
- Historic Environment *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Historic England, 2015b); and
- Historic England *Good Practice Advice in Planning Note 4: Tall Buildings* (Historic England, 2015c).
- Historic England: Local Heritage Listing: Advice Note 7 (Historic England, 2016)

Reading Borough Planning Policies

The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the Historic Environment states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

Within paragraph 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

Proposals

The proposed development of the re-development of the former SSE site on Vastern Road, which contains a local listed building: 55 Vastern Road. No. 55 Vastern Road was locally listed as an early 20th century office building as part of the former industrial depot complex on Vastern Road which is clearly architecturally separately identifiable and distinct from the adjacent buildings. It was probably built in connection with the wider electric works related to the electric tramways which opened in Reading in 1903 (Reading Corporation Tramways).

Paragraph 197 of the NPPF states that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a

balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

As the states that local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions, but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).

As stated in Paragraph 12 of Historic England's Advice Note 7 on *Local Heritage Listing*:

While local heritage listing can be a legitimate response to an actual or perceived threat to a heritage asset, including the threat of demolition, the level of protection afforded is influenced by the manner in which the local heritage list is prepared. The sounder the basis for the addition of an asset to the local heritage list – particularly the use of selection criteria – the greater the weight that can be given to preserving the significance of the asset. The degree of consultation on the list and the inclusion of assets on it also increases that weight. However, the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified.

Conclusions

The proposed development would result in the demolition of the locally listed building which would amount to substantial harm to the locally listed building.

As detailed in the supporting reasons for local listing, 55 Vastern Road is built in a style of building which is representative of Reading, enhances the sense of place and is a building of townscape quality which could be incorporated into the final design. In this case because of the preparation and publication of Reading Council's criteria and process for local listing, greater weight should be afforded to the conservation of this non-designated heritage asset in the planning balance. The current proposals to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block is not considered to have any heritage benefit within the terms of Reading Policy CS33.

Summary	Please see above.
----------------	-------------------

RECOMMENDATION <i>check relevant boxes</i>		CONDITIONS Discharge	PRE-APP submission
<input type="checkbox"/> APPROVE	<input type="checkbox"/> REFUSE	<input type="checkbox"/> COMPLIES with Conditions	<input type="checkbox"/> SUPPORT PRE-APP
<input type="checkbox"/> S106 Legal Agreement		<input type="checkbox"/> NON-COMPLIANCE	<input checked="" type="checkbox"/> OBJECT PRE-APP