

Donna Williams

From: Eatough, Richard <Richard.Eatough@reading.gov.uk>
Sent: 12 April 2019 15:54
To: Eve Ladden Timbers
Subject: Pre-app response, sse site, 55 Vastern Road, Reading
Attachments: 181724 sse preapp response 2.pdf

Please find pre-application advice attached, with our apologies for the slight delay
Regards

Richard Eatough
Acting Development Management Team Leader
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council
Civic Offices, Level 1 North
Bridge Street
Reading
RG1 2LU

0118 937 3338 (73338 internal extension)
Email: richard.eatough@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



The information in this e-mail is confidential to the intended recipient to whom it has been addressed and may be covered by legal professional privilege and protected by law. Reading Borough Council does not accept responsibility for any unauthorised amendment made to the contents of this e-mail following its dispatch. If received in error, you must not retain the message or disclose its contents to anyone. Please notify us immediately quoting the name of the sender and the addressee and then delete the e-mail. Reading Borough Council has scanned for viruses. However, it is your responsibility to scan the e-mail and attachments (if any) for viruses. Reading Borough Council also operates to the Protective Document Marking Standard as defined for the Public Sector. Recipients should ensure protectively marked emails and documents are handled in accordance with this standard (Re: Cabinet Office - Government Security Classification).



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 predominant residential scheme (2-11 storeys) of 193 residential units (81x1, 100x2 & 12x3-bed), together with a ground floor café (Class A3) and also including a new north-south pedestrian link connecting Christchurch Bridge to Vastern Road towards Reading Station.

Pre-application meeting number: 3 (10am - 1pm on Wednesday 27th March)

Information considered: 'River Gate, 53-55 Vastern Road, Reading', by Broadway Malyan, Ref 33440-07-DAS-Issue 02-DRAFT; Verifiable Photomontages by Realm dated March 2019; 28896 Vastern Road Photomontage locations; Letter from eb7 ltd Re: Vastern Road, Reading - Daylight and Sunlight, dated 11/03/19; Transport Pre-Application Scoping Note by PBA, Ref 45152/TN01/Rev A dated March 2019; Townscape and Visual - Summary Commentary for pre-application meeting by Barton Willmore Landscape, Ref 28876/A5 dated 13/03/19; Wind Microclimate - Initial Feedback and Assessment Scope 55 Vastern Road Reading, UK by RWDI Ref 1901994 dated 12/03/19; Letter from Berkeley Homes, Vastern Road - Red line/ SSE Retained Land, dated 12/03/19; 2nd Phase - Consultation Report, SSE Energy, Vastern Road, Reading by Vocalism, dated 12/03/19; RBC Pre-Application 2 Feedback Response Tracker - Dated 13th March 2019 by Barton Willmore; Berkeley Homes (Western)- Proposed Residential Development at Vastern Road, Reading Pre-application Noise Advice Considerations by 24Acoustics, Reference: R7684-2 Rev 1, dated 12/03/19; Energy Strategy Scope and Approach by PBA, Ref TN001, dated 10/03/19; Email from Barton Willmore dated 13/03/19 containing Air Quality Commentary (all of the above documents were submitted on 13/03/19);

Giorgio Framalicco
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

11th April 2019

Extended Phase 1 Habitat Survey Report, 55 Vastern Road by Ecoconsultant dated 27/04/18, as received 28/02/19; Archaeological Desk-Based Assessment by CgMs Ref 25311/CC dated March 2019, as received 20/03/19; 2B Housetype A-03-SK-400 as submitted 22/03/19; Vastern Road Bridge Review by PBA Ref TN002 dated 12/03/19, as received 22/03/19; Vastern Road flythrough, as submitted 22/03/19; Email from Barton Willmore 'RE: 55 Vastern Road - TVIA viewpoints', as received 9/4/19.

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); Sarah Hanson (Natural Environment Officer, Reading Borough Council); Darren Cook (Transport Development Control Manager, Reading Borough Council); Eve Ladden Timbers (Barton Willmore); Katy Walker & Angus Cook (Berkeley Homes); James Cook & Vince Prescott (Broadway Malyan); James Weeks (The Built Heritage Consultancy Ltd); Ioana Nica (Macfarlane Associates); Dan Townsend (Peter Brett Associates).

Input from other officers, albeit not in attendance at the meeting: Mark Worringham (Planning Policy Team Leader); Giles Sutton (Ecology consultant for Reading Borough Council); Lynne Reynolds (Policy and Project Officer - Leisure and Recreation); Sarah Tapliss (Strategic Housing Finance and Development Manager); Rebecca Moon (Senior Environmental Health Officer); Helen Bryant (Access Officer).

Further to previous correspondence, this written note of advice follows pre-application meeting 3, as held on 27/03/19.

General advice / introduction / background

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

- Bulk, Scale and Massing
- Elevations and Materials
- Heritage - Loss of the Locally Listed Building
- Daylight/Sunlight
- Fire Safety/Crime Prevention
- Energy and Sustainability
- Wind/Microclimate
- Transport

Hereafter, the main topics discussed at the meeting are discussed, incorporating comments from specialist officers where relevant (acknowledging that there is some overlap in some areas). In addition, some matters not referenced in the broad agenda but for which information was provided / or has emerged subsequent to the meeting, are also discussed at appropriate points.

Emerging Local Plan update

As you are already aware, the [new local plan](#) is at an advanced stage, with the public examination having taken place in September / October 2018. A [letter from the Inspector](#) regarding the soundness of the local plan was received in March 2019. On this basis the current aim is for the new local plan to be formally adopted in October 2019. It is noted that none of the advice from the Inspector relates to the specific site allocation / tall buildings / design-based matters. Accordingly the emerging policies can be afforded weight in the (future) decision-making process.

Extent of the red line of the proposed application site

Following previous pre-application advice it is broadly welcomed that a letter and attachments has been submitted by the prospective applicant. It is firstly commented that it would normally have been expected for the actual letters / copies of correspondence (with redactions where required) from SSE to have been provided. This is instead of the selectively-quoted extracts provided to date. The simple purpose of the suggested approach is to assist authenticity. In addition, a further concern is the generalised tone of the submission, which is considered to be lacking in specific detail to evidence the points raised. For example, no indication as to the cost of relocating the equipment has been provided, except for it being 'prohibitively expensive'. Whilst officers would not expect a full costing exercise to have been undertaken, an evidence-based ballpark figure should be provided (perhaps backed up with costs on other sites) to assist officers consideration of this matter; as well as communicating the commercial realities of the situation with elected members. It would also be helpful to provide a breakdown as to whether the cost of reconfiguring the equipment within the remaining site - so shifting it further up towards the eastern boundary - would be the same (or more/less) as taking it to an entirely different site? Accordingly, although the letter submitted is welcomed, I am afraid that it is far from suitably conclusive on this matter at this time.

In addition, it has come to officers' attention that SSE may require some equipment presently located on the prospective application site to be relocated to the remaining SSE owned site, and such works in themselves possibly requiring separate planning permission. It is noted that this does not appear to have been referenced in pre-application discussions to date. Obviously at the time of any future such application, full sets of existing and demolition floor plans, elevations and sections will need to be produced/submitted. This should be complemented with supporting commentary regarding logistical issues surrounding the SSE facilities, demonstrating how the essential infrastructure will be retained/maintained at all times (in addition to the separate justification required regarding the demolition of the locally listed building).

Heritage - Loss of the Locally Listed Building

It is a welcomed step that you have detailed the process of comparing various possible options for retention (in various forms), which then ultimately led you to your original conclusion that the locally listed building should be demolished. It is also noted you are seeking to incorporate echoes of 'industrial heritage' throughout the proposed redevelopment scheme. Although officer concerns are still raised in relation to the loss of the locally listed building (as outlined in detail previously), this will ultimately form part of the future officer 'planning balance' at the time of the future planning application. It is therefore strongly advised that your justification at application stage for the demolition of the building is thorough and robust. Notwithstanding the above, the general design approach to encapsulate the industrial heritage of the site as a design theme is broadly welcomed.

Bulk, scale and massing / elevations and materials

Considering the Vastern Road element first, this building has been significantly amended since the previous meetings. The majority of the changes are positive, with the moves to red brick and a 'warehouse feel' positive in nature and helps to provide the scheme with a sense of place. Furthermore, the link element is now far more subservient in nature and additional breathing space is provided at this point too. The overall massing is not too dissimilar to previously, with the main change being a single tower element rather than two. The need for a wayfinding point is noted, but there is considered to be no scope to further increase (in comparison with that presently proposed) the height of the tallest (11 storey) element owing to the strong policy position of Policy RC13 (Tall Buildings). Put simply, the site is located outside of a tall buildings cluster, so it would appear extremely difficult to envisage officer support being able to be offered should a tall building be proposed, as this would also be in conflict with the RSAF.

In terms of the detailed design of the Vastern Road building, there are some key areas where some refinement should be explored:

- The top section of the tower element presently appears at odds with the prevailing character; it is considered that various options are explored/presented for consideration by D:SE.
- Concerns are raised as to whether the single pitch on the roof elements is appropriate, or whether it would appear too dominant and instead perhaps a double pitch (more in character with Vastern Road dormers (p33) and 1948 photograph (p36) (specifically the left hand side turbine hall which is east-west in direction) is more suitable?
- There are questions as to whether there is sufficient differentiation in the fenestration - for example, could the inclusion of arched windows at ground floor level be provided, and/or could a subtle change in the window opening size on the uppermost floors be incorporated, to appear as an attic level.
- You should explore the provision of metal railings as the balcony balustrade feature, rather than glazed balconies (aligning better with the heritage narrative).
- The continuing lack of front doors onto Vastern Road is disappointing. Although commentary is provided to explain the line of a culvert on Vastern Road and flooding

matters prevent the ability to provide a front door, it would be expected for this to be evidenced through plans/sections to explicitly demonstrate the constraints. This has not been provided to date and therefore the lack of a true active frontage onto Vastern Road is still currently considered to be a missed opportunity.

Moving on to consider the mews (Building E), it is recognised that numerous steps have been incorporated to seek to address significant amenity-based concerns raised by officers previously. Whilst recognising that you have incorporated some features which improve the proposals for existing/future Lynmouth Road occupiers, the nature of what is effectively a 'cat-slide' roof would appear oppressive and harmful for existing occupiers given the proximity to Lynmouth Road properties. In simple terms, significant concerns continue to be raised that the proposals at this point will be harmful to the existing occupiers, leading to a loss of outlook and creating a harmful sense of enclosure. Furthermore, the day/sunlight assessment has indicated that harmful impacts are envisaged in these terms too. It is difficult to see how the proposals will be able to be supported by officers given this clear and harmful impact (Policy DM4 is the principal policy here).

It is considered that a potentially significant adjustment to the scheme is required at this point to address this concern and this suggestion ought not be a surprise to you in light of the previous concerns officers have raised. One possible solution to explore could be the decking or partial decking over of the vehicular route (which continues underneath), to be able to reconfigure or move the residential units further away from Lynmouth Road (with the width of the mews likely to decrease, owing to the consequential increased closeness to blocks B & C) to allow a widened single pedestrian route. It is acknowledged that this could be constrained by various other factors, such as the height of any refuse vehicle to access the decked in area, but this is one area to potentially overcome this existing conflict. Notwithstanding the above, I would comment that the general massing and design of the mews block is pleasant, although perhaps the brickwork and window detailed could be developed further to better relate to the industrial heritage theme running through the emerging scheme.

Moving on to the River side element, again some welcome advances have been made. Removing the link, increasing the spaciousness of the gap, squaring off Block C, introducing a ground floor café and refining the massing to create a more gradual increase in scale off Lynmouth Court are all positive improvements to the scheme presented at Meeting 2. However, based on the further visual material provided (e.g. view 1017 from Reading Bridge) the massing is very substantial and as such the scale / massing could still appear particularly dominant. This is exacerbated by the site almost marking a turn in the river, making it especially prominent at this point. Continuing on from this, the views assessment note by BW Landscape is helpful, albeit the tone of some of the language e.g. "Creating distinctiveness and drama at the riverside" is at odds with the Policy CS8 context which seeks to protect waterspaces and the open character of The Thames environs. As such, officers are not yet completely convinced that that the massing on the river side is appropriate and would comply

with Policy CS8 in particular. As such, this should be a focus for further justification in order to seek to persuade officers that the proposal is acceptable at this point.

Notwithstanding the massing points above, in terms of detailed design, many of the principles proposed to be incorporated are welcomed. The power station theme/form is a positive step, with the circular windows or brickwork above the top floor of the set-back Block C another welcomed detail to be included. Given the prevailing character, the lighter brick is satisfactory, as is the bronze look metal top floor. Similar to the observations about regarding the Vastern Road frontage, it is questioned whether a double pitched roof may be more appropriate than a single pitch at this point. Furthermore, it is questioned whether the orientation of the roof closest to Lynmouth Court needs to turn 90 degrees, or whether it would be more appropriate for it to be consistent with the others? Again in terms of detailing, the provision of metal railings rather than glazed balconies may be more suitable.

In terms of TVIV viewpoints, at the meeting a number of comments were made; this has been picked up in a subsequent telephone conversation and email from Barton Willmore on 09/04/19, the contents of which is noted and agreed.

Amenity

In addition to the loss of outlook / sense of enclosure issues raised in respect of Lynmouth Road properties, as detailed above, various other amenity related-matters require commentary at this point:

In terms of the day/sunlight assessment by eb7, it is noted that this is a preliminary report. The VSC and no-sky line tests show clear instances where the daylight will worsen beyond the BRE standards, particularly at the southern end of Lynmouth Road, as expected by officers. In this regard it is advised that you explore undertaking the average daylight factor test too, in order to provide the fullest picture of what impact the proposals would have on nearby occupiers. As you are already aware, at application stage an independent review of your future report will be commissioned (as funded by the applicant) to further assess this.

In terms of future occupiers, it is again noted that this is a preliminary study, but it is already evident where the lower levels are going to be located (in particular the low level north facing living room windows & inward corner points of blocks). Again the future independent review will analyse your future report in detail, but naturally the expectation from officers will be for the day/sunlight tests to be met as far as practicably possible, and for the design of the scheme to be partly influenced by these requirements.

Turning to access matters, the Council' Access Officer has considered the proposals and provided the following comments for your consideration:

- Shared spaces are extremely unpopular with many disabled people as being perceived to be unsafe, including, but not limited to, blind and visually impaired people, people with learning difficulties and people using wheelchairs. Indeed, Guide Dogs (formally

“Guide Dogs for the Blind”) have been campaigning about this issue for years.

<https://www.politics.co.uk/opinion-formers/guide-dogs-for-the-blind-association/shared-spaces-campaign>

- If the traffic levels will be relatively low, then the Government’s pause on such shared spaces schemes, as set out in its Inclusive Transport Strategy does not apply, but if traffic levels are higher, then it will.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/749116/ministerial-letter-about-shared_space.pdf
- It is questioned whether the provision of 2 accessible parking spaces is sufficient for the proposed development [as an officer comment, I too question whether more could/should be provided]. Furthermore, locating these spaces near the turning head might be a safety concern, especially for some with young children who are disabled (e.g. children running off and may not be very aware of danger).
- Notwithstanding the above, if units are being designed for disabled people (either for future adaptation or for immediate use), it would obviously make sense for these to outside Building D, where the parking will be (unless Building E units are proposed?), should level access be proposed and the units be able to be accessed from the parking spaces?
- Particular attention should also be paid to the ramp where the bridge lands. In principle the provision of a very shallow gradient is welcomed from an access perspective. However, the following comments are also made:



- This sort of detailing might read to a visually impaired person as ‘steps’ [rather than a slope], and so should be avoided.



- If there are steps, then it should stand to reason that there should also, where possible, be ramp access.
- From an access perspective, there should be a good mixture of seating, both with and without arms, lower and higher, with and without backs, throughout the site.
- It is advised that it would be pleasant to have some plants which are scented by the sides of routes.

- Junctions between surfaces, especially wood and paving, need to be smooth so that wheelchair wheels or buggy wheels etc do not get caught and cause a hazard.
- Although it is acknowledged that biodiversity needs be fully considered, from an access perspective levels of lighting must meet the needs of all, including visually impaired people and older people. Lighting must not create “pools” of shadows that could be confusing to those with impaired sight. These matters should be factored into the lighting / landscaping scheme.

You are advised to take the above comments into account when advancing your proposals, noting that there will be a number of areas where the points raised may conflict with observations from other specialist officers. As such, where there are competing demands, your future submission should make clear and account for these, with reasoned narratives provided to detail your proposed approaches. But policies CS3, CS5 and RC14 require new public realm spaces to be inclusive to all in their design.

RBC Environmental Protection - Noise and Air quality - officer comments were supplied in advance of the meeting on 21/03/19. For the purposes of brevity, they are not repeated in this advice note, but naturally should be taken into account.

RBC Natural Environment (tree officer) - officer comments were also provided to you. As per the discussions at our meeting (e.g. further discussions regarding the location of trees along the mews access being located on alternate sides (west - adjacent to the mews; east - adjacent to the pedestrian path), it is emphasised that these comments are incorporated as you further advance your proposals.

Ecology

I previously provided comments from GS Ecology (for the LPA) regarding the extended phase 1 survey report (submitted on 28/02/19) via email on 25/03/19. For the purposes of brevity, they are not repeated in this advice.

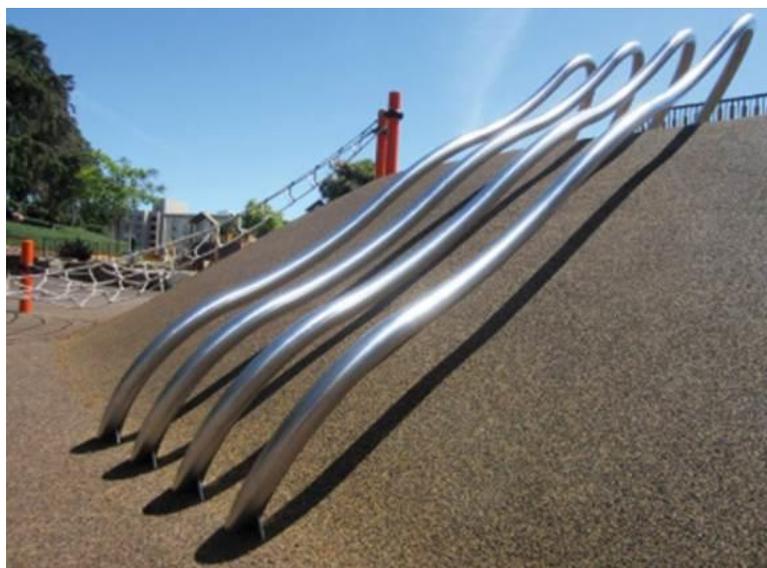
In terms of the lighting strategy, at this juncture the information is respectfully considered to be rather limited and very broad-brush. However, it is advised that you will need to demonstrate at application stage that a suitably dark corridor can be maintained along the River Thames with no light spillage over this area (it is strongly recommended that you explore engaging a lighting specialist and ecologist to work on this in collaboration). The lighting scheme should be in accordance with the new bats and lighting guidance - <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/> - and light spillage should be minimised from the inside the buildings (by reducing window sizes, using low glare glazing, keeping light fittings set back from the windows, having recessed light fittings etc.) and outside of the buildings (by using downward-facing light fittings, with narrow beams, not using bollard lighting, etc.). The strategy should be informed by a baseline survey of the light levels as they are now and if it cannot be demonstrated that a

dark corridor can be retained along the river Thames it may be necessary to undertake bat activity surveys to determine how important this area is for bats.

RBC Leisure & Recreation

The Leisure & Recreation officer firstly advises that their previous comments still apply. With regard to the Play Strategy (page 121 of the DAS) it is recommended that, “water walls” should be avoided. Apart from the ongoing maintenance costs associated with this, for most of the year our climate is not suitable and to be successful, such features should be situated in an open and sunny aspect. Keeping the water clean and the area free from algae and discolouration is also problematic. Officers can, however provide broad support for the concept of stepping stones being incorporated into the design, particularly being adjacent to the river.

It is also recommended that consideration should also be given to the installation of artistic objects which also double up as play features, such as the following:





Fire Safety/Crime Prevention

With regard to fire safety matters, it is strongly advised that your future submission should include either a standalone document or a clear section within the DAS on this topic. Although a number of these matters go beyond the scope of consideration at planning application stage, owing to recent events, it is expected by members that a document detailing the measures the applicant is fully committed to providing is provided.

In terms of Crime Prevention, Anne Chalmers the Crime Prevention Design Advisor at Thames Valley Police has been provided with a copy of the main document submitted with this pre-application enquiry. She has provided a verbal update to me that at the time of writing she is presently awaiting her own internal comments from various TVP departments, which would then enable her to comment in full (in particular the views of the counter terrorism team are sought in respect of the proximity of the site to the boundary with SSE equipment). At the time of writing no formal response has been received from the Crime Prevention Design Advisor at Thames Valley Police. In the circumstances Anne suggests that I provide you with her direct contact details and that you seek to contact her with view to a standalone meeting on this matter. Obviously this is potentially a complex scheme from the perspective of the Crime Prevention Design Advisor at Thames Valley Police, owing to the nature of the proposals and the characteristics of the site/surrounding area. Please see Anne's contact details below:

Anne Chalmers | Crime Prevention & Design Advisor | **Berkshire** | Local Policing | Thames Valley Police |

Internal: 334 5472 / External telephone number. 01865 309157 / Mobile: 07800703324
Email: anne.chalmers@thamesvalley.pnn.police.uk

I would ask for you to copy me into any future email correspondence for my information please. I acknowledge at this point that on occasion, matters in this area are sometimes found to be at odds with other consultee comments; as such, officers are sometimes required to balance competing demands in some areas and you should bear this in mind.

Sustainability and Energy

It is welcomed that the DAS includes a specific initial section regarding the proposed energy strategy, and this has been complemented with a scoping note undertaken by PBA. It is clear from the scoping note that your consultant is already aware of both the current and emerging policy context, in particular the potentially more stringent zero carbon requirements and the expectation to link into decentralised energy networks (as per emerging policy CC4 and the supporting text / background evidence - in this regard you should be aware that an application at nearby 80 Caversham Road is now newly valid and registered - ref 182252). More specifically, it is noted at the bottom of p2 of the PBA note that. “emerging legislation noted now discourages some approaches identified as favoured in current policy and PBA would seek to agree and approach that recognises this shift in policy and objectives.” It is advised that adopted and emerging policy is taken into account and that if you are seeking to deviate from this approach, then explanations/rationale for this should be detailed now for discussion with officers at pre-application stage.

It is also noted that at the meeting you suggested a BREEAM pre-assessment or compliance with BREEAM would not be required owing to the proposed floorspace being below 1000sqm. It is advised that a BREEAM pre-assessment will be required. Should the non-residential component be <1000sqm (i.e. a ‘minor’ development) then this will be required, as a minimum, to achieve a BREEAM ‘Very Good’ rating. This is in line with adopted Policy CS1, the adopted Sustainability SPD (see table 3.2 at p13 for example) and emerging Policy CC2. The BREEAM pre-assessment submitted at application stage should form part of a wider sustainability strategy / statement, required in line with policy and as referenced at section 20 of the validation requirements document.

Wind/microclimate

You are advised in general terms that emerging Policy CC8 details that wind is to be taken into account for new developments more than 8 storeys. In addition, it is noted that paragraph 5.3.47 of the emerging local plan details that wind should be assessed against the Lawson Criteria. In terms of the initial RWDI note, the following general officer advice is provided. (Please note this is based on previous experiences of wind assessments being reviewed at application stage and is obviously notwithstanding advice provided to the local planning authority by an independent consultant at the time of any future application.):

- It is not clear whether wind tunnelling tests are to be undertaken as part of the future submission; this should be considered in this instance owing to the nature and location of the proposals;

- If mitigation measures are required, these should be incorporated into the design of the scheme as submitted at planning application stage, rather than the report just describing them and these not being 'joined up' into the actual proposals.
- Ensure that suitable locations are tested are both within and outside of the red line of the application site; especially given the nature of the proposals and the nature/use of the site/surrounding area.
- The report should be clear as to whether it is taking into account the massing of the existing or possible future surrounding area. It is suggested that a robust approach would be that both scenarios are tested. In terms of the future surrounding area, land to the south of Vastern Road is likely to be coming forward shortly (the prospective applicant is encouraged to liaise with the nearby landowner) and application 182252 (80 Caversham Road) is a current application under consideration, so the publicly available information for that proposal can be fed into your future assessment.
- It is strongly suggested that the wind assessment considers all four seasons, rather than just Summer and Winter (as suggested), to provide representative future microclimatic conditions.

Transport

It is advised, as discussed at our meeting, that the Transport officer is largely satisfied with the information provided and you should explore the slight tweaking of the location of the Toucan crossing, as discussed.

Mix / Density / affordable housing

With regard to mix, the schedule at p73 proposes an over-reliance of 1-bed units (42%, more than the maximum 40% guidance figure of Policy RC9). As per the policy wording, your future viability submission should demonstrate explicit scenarios to demonstrate that a less than 40% provision of 1-bed units would render the development unviable (and a further scenario which demonstrates that the 42% provision is consequently the only viable option available). This is the only means in which flexibility could be applied. Aside from the over-provision of 1-bed units, the provision of 6% 3-bed units is welcomed in principle in line with Policy RC9.

With regard to density, the provision of 252 dwellings per hectare is likely to be able to be justified in line with the factors referenced at Policy CS15 (as well as the site specific allocation too). At the time of your future application submission, the onus is on you to demonstrate / justify the proposed density based on supporting commentary discussing these various factors.

In terms of affordable housing, the in-principle headline figure to provide 30% on-site affordable housing is welcomed, indicating compliance with Policy CS16. However, it is noted that no information has so far been provided in terms of the tenure mix. In discussion with colleagues in RBC Housing Development, it is advised that the scheme provide as much rented units as possible, with at least 50% of the provision at either Social Rent or Affordable Rent

no more than 50% of market rent (as per the policy and SPD). If the affordable housing tenure mix does not comply with policy/guidance, then again, viability submissions will be required to seek to justify this. Further detailed pre-application discussions regarding the specifics of your intended offer would be welcomed and strongly encouraged at pre-application stage.

Archaeology

Berkshire Archaeology has been consulted on the CgMs DBA received on 20/03/19 and Roland Smith (Archaeology Officer) has commented as follows:

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

Archaeological Desk-Based Assessment

Following Berkshire Archaeology's advice, the applicant has submitted an 'Archaeological Desk-Based Assessment' prepared by CgMs Heritage and dated March 2019. This assessment presents the archaeological background to the application area, assesses its archaeological potential and considers the likely impacts of the development proposal on buried archaeological remains.

The principal conclusions of the assessment are as follows:

- 1) There are no known heritage assets, whether designated or not, within the site except for the locally listed early 20th-century entrance building on the Vastern Road frontage. As this is part of the built heritage this will not be considered further here.
- 2) The site's archaeological potential primarily stems from its location on the floodplain of the River Thames within the archaeologically-rich Middle Thames Valley. On this basis the site is considered to have a 'modest' potential to contain buried remains of prehistoric date.
- 3) Prior to the 19th-century the site was in agriculture but from the late 19th-century it has witnessed significant development with a series of major structures located within the site. The construction and demolition of these buildings is likely to have had a major impact on below ground deposits.
- 4) Geotechnical data indicate 'made ground' up to 2m in depth across the site. The 'made ground' lies above alluvium, between 0.7m and 3.5m thick. A 'peat like' deposit, which is of archaeological interest, is recorded within the alluvium in one part of the site.
- 5) Exploratory archaeological investigations at sites in a similar topographic location have taken place less than 200m to the east and west of the application site along Vastern Road. Both recorded alluvial deposits but no pre-modern remains.
- 6) CgMs' assessment concludes that the development proposal has the potential to impact on any buried remains that may exist within the site and therefore anticipates that a programme

of archaeological work will be required in mitigation but this can be secured by an appropriately worded condition, should the scheme proceed.

Berkshire Archaeology's View

CgMs' assessment is a fair and reasonable assessment of the archaeological potential of this site at 55 Vastern Road. Berkshire Archaeology agrees that there is some potential for prehistoric remains to occur within the red line boundary and the apparent presence of a peat deposit is also notable. It is acknowledged that the site has undergone considerable past development which is likely to have had some impact on below ground deposits and therefore Berkshire Archaeology agrees that further archaeological investigation can be undertaken post-consent to any future planning application and secured by a suitably worded condition.

This is in accordance with Paragraph 141 of the NPPF which states that local planning authorities should 'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'. The following condition is therefore recommended:

Condition

No development, other than demolition to ground level and excluding the breaking up and removal of floor slabs, foundations and other below ground obstructions, shall take place within the application area until the applicant, their agents or successors in title have secured and implemented a programme of archaeological field evaluation in accordance with a written scheme of investigation, which has been submitted by the applicant and approved in writing by the Local Planning Authority. The results of the evaluation will inform the preparation of a mitigation strategy which will be submitted by the applicant and approved in writing by the Local Planning Authority prior to the commencement of the development.

Reason:

The site lies in an area of archaeological potential, particularly in relation to prehistoric land use. The potential impacts can be mitigated by a programme of archaeological work so as to record and advance our understanding of any heritage assets to be lost in accordance with national and local planning policy.

As regards field evaluation, CgMs recommends a staged programme of investigation commencing with geo-archaeological investigations and concluding with targeted trial trenching informed by the geo-archaeological work. Berkshire Archaeology agrees in outline with this strategy, subject to finalized details of any future scheme, and we would be pleased to discuss details with the applicant or their archaeological consultant in due course.

The field evaluation will establish if there are any areas of archaeological interest that require further investigation either prior to or during development and which will be subject to a mitigation strategy for agreement with the local planning authority setting out the

details of the further investigation. If no areas of archaeological interest are identified, no further investigation will be sought.

It is recommended that Berkshire Archaeology is re-consulted should the red line boundary of the site be changed.

It is assumed that this is satisfactory but if you have any questions or would like to discuss this in more detail then please do not hesitate to contact Roland in the first instance (roland.smith@reading.gov.uk)

Next steps

As advised at the meeting, officers consider that the next steps in the pre-app process should involve gaining input from Design:South East and then potentially undertaking a further/final pre-application meeting with officers. This would be with a view to building on the progress made in this latest submission and discussing the remaining unresolved matters.

Conclusion

In conclusion, based on the latest information submitted, it is recognised that the latest iteration of the proposals includes a number of welcome steps forward (in comparison with previous submissions). However, there are a number of unresolved issues, some of which could have significant implications on the overall proposals. It is suggested that further engagement with officers, subsequent to the anticipated D:SE review, is undertaken prior to any formal submission to the local planning authority (which you have indicated would be likely in June 2019).

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

JM