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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 c. 207 residential units, including a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road towards Reading Station.

Pre-application meeting number: 2 (2.30pm - 4.45pm on Tuesday 29th January)

Information considered: 'River Gate, Vastern Road, Reading-on-Thames', by Broadway Malyan, Ref 33440-07 Rev O, as received 15&16/01/19; River Gate, Vastern Road, Reading-on-Thames, Landscape Strategy by Macfarlane Associates, as received 15&16/01/19; 55 Vastern Road Reading Initial Heritage Statement Draft By Building Heritage Consultancy, dated January 2019, as received 15&16/01/19; Overview of Flood Risk and Flood Mitigation Strategy Ref 4001/TN001 by PBA, dated 08/01/19, as received 15&16/01/19; Transport Pre-Application Scoping Note Ref 45152-TN01 by PBA, dated January 2019, as received 15&16/01/19; Interim Consultation Report, SSE Energy, Vastern Road, Reading by Vocalism, dated 08/01/19, as received 15&16/01/19; Principle of Development/Demolition by Barton Willmore, as received 23/01/19; Email from Barton Willmore, 'RE: 55 Vastern Road, Reading (181724/PREAPP)', as received 24/01/19.

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); Eve Ladden Timbers (Barton Willmore); Katy Walker (Berkeley Homes); James Cook & Vince Prescott (Broadway Malyan); James Weeks (The Built Heritage Consultancy Ltd); Glen Macfarlane (Macfarlane Associates); Dan Townsend (Peter Brett Associates).

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15th February 2019

Input from other officers, albeit not in attendance at the meeting: Darren Cook (Transport Development Control Manager, Reading Borough Council); Mark Worringham (Planning Policy Team Leader); Giles Sutton (Ecology consultant for Reading Borough Council); Lynne Reynolds (Policy and Project Officer - Leisure and Recreation).

Further to previous correspondence, this written note of advice follows pre-application meeting 2, as held on 29/01/19.

General advice / introduction / background

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

- Bulk, scale and massing
- Further justification for demolition / heritage
- Public realm and landscaping
- Housing standards & Unit Mix
- Affordable Housing
- Ecology
- Flood Risk/SuDS
- Highways and parking
- Community Engagement Update

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):

Bulk, scale and massing

In general terms it is firstly noted that there has been no change (or indeed any mention) in respect of the scope to alter the red line of the future application site. This is extremely disappointing, as officers consider that the extent of the proposed site (within the context of the site allocation - with the allocation envisaged to come forward as a single scheme, rather than being fragmented as now shown), is a key constraint in any future proposal. Essentially, it is making what would have previously been a challenging site (if the allocation came forward as a single proposal) even more difficult. Accordingly, you are again advised to explore in any way whether the red line boundary of the site can increase, building on the previous advice at the bottom of page 7 and the top of page 8 of the advice note which followed pre-app meeting 1. Further commentary is provided in relation to this at the 'related land uses' section below.

Also considering the proposals in general terms, it is reiterated from a policy perspective that the Reading Station Area Framework provides the guidance on building height, and

anticipates that the 'benchmark height' west of the avenue would be 4 storeys and east of the avenue 6 storeys. As it stands therefore, the proposal clearly exceeds the policy approach. Accordingly, in any emerging proposal you will need to justify this, with it being advised that particular reference should be made to the impact additional height will have on the lower-density residential to the west, the character of the Thames and Christchurch Meadows and the quality of the link through the site. Hereafter the three main sections of the scheme (1. Vastern Road (blocks A&B); 2. Mews block (block E); 3. River front (blocks C&D) are considered in turn.

Vastern Road (blocks A&B)

It is firstly recognised that the previously proposed part 5, 6, 8 & 11 storey element is now reduced in scale to parts, with some top storeys incorporating mansard floors rather than standard storeys. Accordingly, in broad massing terms (notwithstanding other comments in this response - e.g. continued concerns regarding the demolition of the locally listed 55 Vastern Road), the outer edges on both sides of the proposed massing (p50-51 - the 4.5 & 5.5 storey elements as per p55 towards the west side of the site, and the 5.5 - 7.5 storey elements towards the eastern side of the site) appears appropriate in principle, assimilating satisfactorily in the streetscene.

However, concerns are raised in relation to the form/nature of the central 11 storey elements, which continue to appear out of scale and character, together with the unconvincing form of the archway element. The resultant 'tunnel' / 'alley' has the potential to result in significant wind issues and crime/safety implications. Meanwhile, the resultant massing above this would fundamentally reduce legibility through the site - with views through towards the river / bridge severely limited, whilst this also magnifies the overall massing of this block as an uncompromising solid mass along the entire length of Vastern Road.

In terms of the design approach, significant concerns are again/also raised. Based on p47 there are serious concerns raised in relation to the architectural approach and design quality of the scheme. In particular, there are considered to be too many composite parts to the design approach, with this resulting in an incoherent end appearance. The most significant concerns are raised in relation to the not sufficiently refined top storey elements of the tallest 11 storey parts and the almost apparent walkway balcony spaces on the floors above the pedestrian route through the site. Question marks are also raised over the mansard forms and whether these are appropriate (officers would seek further justification for the inclusion of such features in future proposals, thereby not ruling out this form at this time).

In short, the proposals are considered to currently lack finesse or elegance, with the approach instead respectfully being borderline brutalism. It is considered that a defined gap is required to break up the massing and assist legibility, whilst the overall height of the central element is also in need of significant refinement (i.e. reduction). It is considered that the reduction in height here could possibly be countered by increasing the existing 4.5 storey

block to the east of the car park for block B / to the rear of block B, should other constraints allow this (e.g. day/sunlight / proximity to block E).

Another concern, as picked up at our meeting is that the proposals presently lack sufficient explanation to demonstrate the rationale for the various choices made. Only limited text is provided and it is strongly suggested that the narrative behind the approach is more fully explained in future pre-application submissions.

At this point in time, based on the information submitted to date, officers feel that 8 storeys would be the maximum scale permissible at this part of the site at present. This is considered more appropriate within the context of the prevailing site and surroundings, together with the prevailing policy context (whilst noting that this is significant step above the 4/6 storey benchmark heights referenced in the Station Area Framework).

It is also noted that there continues (despite previous feedback) to be a complete lack of street activity on Vastern Road, with only limited entry points to apartment blocks provided. At the meeting you explained this was partly a result of underground constraints, which it is advised are detailed in full in the next pre-application meeting. Officers reiterate that active street frontages should be included where possible.

Naturally officers would welcome and encourage further discussion in relation to the layout and bulk, scale and massing of these blocks in future pre-application meetings.

Mews block (block E)

Previous concerns were raised at pre-app meeting 1 in relation to the footprint and amenity (both for future occupiers and impacts on existing Lynmouth Road properties) impacts, as detailed at p5-6 of the previous written note. The proposals have been updated and the extent of the mews has reduced in length - it no longer extends to the banks of the Thames and instead virtually aligns with the length of the Lynmouth Road terrace to the west). Furthermore, the exact location of the mews has changed, with the 2.5m-3m offset from the western boundary removed and it is instead proposed for this block to be built on the western boundary of the site, directly against the boundary with the rear amenity spaces of Lynmouth Road properties.

In short, significant concerns remain in relation to the amenity impacts of this proposed block. In-fact, in a number of ways the current proposal raises even more significant concerns than the present proposals. The intention to move a two-storey block against the boundary with Lynmouth Road properties is considered to be a backward step (even in the context of the significant concerns raised previously). The provision of two-storey buildings at this point, between 7m and 10m from the rear elevations of these buildings, would cause a significant detrimental impact to the living environment of existing residential properties owing to visual dominance and being overbearing. It would also potentially result in unacceptable loss of privacy/overlooking (depending on the internal layout of the proposed units) and result in a

loss of daylight and sunlight to habitable rooms / rear amenity areas. Again, the Policy DM4 reference to a 20m standard back-to-back distance is noted. It is surprising that these proposals have been advanced when the advice at pre-app meeting 1 was abundantly clear in this regard.

In addition, concerns are also raised in relation to the 15m (on the basis of the scale provided at p31 of the Broadway Malyan document) distance between the east elevation of block E and the west elevation of block B is another significant shortcoming (in the context of the 20m distance referenced above), as is the 11m distance between the south elevation of block E and the north elevation of block A (should habitable room windows be proposed on the south elevation of block E) and the 15m distance between the north elevation of block E and the south elevation of block D (should habitable room windows be proposed on the north elevation of block E).

At the meeting you raised the possible idea of include breaks in the two-storey massing to possibly address the concerns raised in terms of Lynmouth Road properties. You are advised to explore this, but from officers perspective it is likely to be challenging to address the concerns raised, whilst simultaneously providing a design composition which is effective and accommodation which is suitable for future occupiers. Accordingly, you are advised to explore further options in more detail, with it being advised that in relation to the narrowest middle section of the site only, option 02 (on p30 of the Broadway Malyan document) may be a more appropriate response to the site given the proximity of the Lynmouth Road properties? Officers would welcome further discussions in relation to the layout of the scheme at this point at the next meeting, with the exact rationale for each option explored in detail in the fullest terms by you.

River front (blocks C&D)

It is acknowledged that in broad massing terms the current iteration (3/7/9 storeys) represents a reduction in comparison with that presented at meeting 1 (7/9/11 storeys), at which time the proposal was referenced by officers to be dominant, imposing and oppressive to the river, causing significant harm in this most sensitive setting (page 6 of the meeting 1 advice note). Although there have been evident reductions in the current proposal, it is still considered by officers that the proposal could be viewed as being dominant, imposing and oppressive to the river (causing significant harm).

In particular, the sheer dominance of the massing in this setting is of significant concern. It is suggested that the massing could be broken down by removing the accommodation proposed above the pedestrian route (which similar to concerns raised in the Vastern Road section above - which can be equally applied here too), which would also assist legibility through to the station too. In addition, the increase in massing from three to seven storeys at the western end of block D is considered to be too close to the neighbouring existing Lynmouth Court properties. It is suggested that either a more gradual stepped approach is proposed at this point, or the extent of the lower three storey element is increased further to the east (to

provide sufficient relief to Lynmouth Court). Accordingly, it is strongly advised that the massing options for the river front is revisited and re-apprised for discussion at the next pre-application meeting.

Concerns are also raised in relation to the north-south depth of block D on the western boundary of the site (even at 3 storeys and with the pocket park detailed in the Macfarlane landscape document - this is not detailed in the Broadway Malyan document) and this potentially resulting in an overbearing / visually dominating impact on existing Lynmouth Court occupiers, as well as potentially negative overlooking and day/sunlight/overshadowing impacts.

In addition, it is considered that the footprint of block C, in particular the element away from the river front, is contrived in its nature in being unusually shaped to follow the boundary of the site. Knock on questions are raised in respect of the potential quality of accommodation for occupiers at this point, owing to the intended scale of Block D and the existing height of the remaining structure close to boundary within the unaltered SSE part of the wider site (shown to be a 7m distance away from the south elevation of block C).

In broad terms the set back of blocks C & D from the river are welcomed, although no measurements have been provided to evidence a 10m distance from the top of the bank of the river to the buildings at all points (as required by the emerging site allocation). Further detailed discussions will be required as to whether the spaces are public/private (or a combination of both) and how the site connects with the public access along the Thames (at river level), in addition to the bridge connection above.

In terms of the design approach (most substantially shown by p39 of the Broadway Malyan document), similar concerns to those raised in respect of Vastern Road, as detailed above, are made. In particular, questions are raised in respect of the architectural quality of the approach and more commentary is required to demonstrate the various options considered. In light of the footprint/massing comments already made, it is likely that the design approach will also evolve too, with officers welcoming more commentary to explain the future proposals in upcoming meetings.

Finally, as a point of clarification, officers consider that the layout and bulk / scale / massing matters are not yet at an advanced enough stage to facilitate the scheme being considered by Design South East.

Further justification for demolition / heritage & related land use issues (as per the Barton Willmore submission received on 23/01/19)

Demolition/Heritage

In the first instance it is noted that the full observations from the Council's Historic Building Consultant are included as appendix 1 to this advice note. Accordingly, this provides an

overview and summary of these matters. Following on from the serious concerns raised at meeting 1, it is noted that predominantly pages 29&30 of the Broadway Malyan document and the Heritage Statement seeks to respond to this. In short however, officers do not consider that all of the possible options to retain (either in full or in a somewhat altered form/scale/location) the local listed building have been evidenced to officers to date. Accordingly, it is advised at this time the demolition of the locally listed building is not supported by officers.

More specifically, it was previously advised that various options to retain the locally listed building were examined. This included those which also incorporated the re-location of the north-south link, with this possibly forming a feature of that route (with one option including development above and beyond the building. Furthermore, the options shown for the retention of 55 Vastern Road assume that it can only be retained as part of a block that extends along the whole Vastern Road frontage, and therefore the effect that this has on the north-south link forms a reason for loss of the building. It is not clear why retention of the locally-listed building necessitates a full frontage block, and why the building could not be retained as part of a slightly amended block B footprint? These options would at least need to be shown in full and assessed thereafter, because the planning balance between the loss of the building and creating the direct north-south link will be likely to form a basis in justifying the loss.

It is also recognised that at our meeting it was suggested by you that the front façade of the building could be potentially relocated elsewhere on the site. Although the Historic Buildings Consultant considers that you may wish to explore this further, at this juncture it is considered difficult to envisage how this would work successfully in practice. Therefore, significant caution is raised at this point. Should you wish to consider this further, officers would expect to be provided with details as to the practicalities as well as the actual form of such an approach.

It is also considered worthwhile clarifying that 55 Vastern Road was not locally-listed at the time of drafting the RCAAP policy, or indeed when the Local Plan policy was initially drafted. As a result, neither site allocation explicitly anticipates its retention.

In respect of your 'the principle of demolition' document (section 3 of the note received 23/01/19), it is advised that such factors are a starting point for the future officer assessment regarding whether the benefits of the development significantly outweigh the asset's significance. It is premature to provide an officer viewpoint / judgement on such a matter at this time (especially in the context of the above advice regarding not all options having yet been considered / demonstrated / evidenced). However, it is clear that such a future assessment will be in line with the second paragraph of emerging Policy EN4. In this regard, particular focus should be made to the matters explicitly referenced in the emerging Policy CR11g allocation, such as enhancing public access along and to the Thames / the high quality route including a green link. As such, ensuring that these elements are successfully incorporated will be essential in this future officer assessment.

Related land use issues

Input has been sought and received from my Planning Policy colleagues regarding the pre-app meeting 2 submission.

In this regard, building on advice provided at the bottom of page 7 and the top of page 8 of the advice note which followed pre-app meeting 1, it is advised that clarity will be required in the future submission regarding why the entire site allocation is not coming forward as a single scheme. More specifically in terms of the retention of the electricity equipment, its retention was not envisaged by the policy, either in the RCAAP or the Local Plan. There are a number of compromises in the proposal that result from that decision, such as the alignment and width of the avenue, the relationship between vehicles and pedestrians, and the way it connects to Christchurch Bridge. Whether or not the local planning authority can accept those compromises largely comes down to whether officers agree that moving the equipment is not possible or viable. Although it is noted that a development on the remainder of the site is included as a possible Phase 2, it is respectfully advised that if moving the equipment is not possible at this stage, there is likely to be very little chance that it could become possible as part of a smaller future development. For this reason, it is reiterated that a clear statement / evidence (including practical, viability and other inherent reasons) about why moving this equipment is not possible will be critical to determining the future application. This should form a standalone document in any future application submission.

Loss of existing office use / floorspace

In terms of loss of employment, in conjunction with discussions with the Planning Policy team, it is advised that the allocation for residential development in the RCAAP/Local Plan essentially establishes the principle. More specifically, the development plan accepts that there will be a loss of employment in this location in order to deliver more important strategic objectives. Accordingly, it is not considered that there will be an issue in terms of the policies on loss of employment (CS11 and EM3). It is suggested that the commentary provided by you to date is sufficient in this regard.

Justification for a residential only scheme

The proposal is primarily residential-led, as set out in the policies. The RCAAP includes no figures for number of dwellings. The Local Plan states that 250-370 dwellings could be achieved, but does make clear that this is subservient to more detailed design and layout work that shows what can be accommodated. Clearly, the retention of the SSE equipment has a significant restriction on what can be achieved, and if this principle is accepted it follows that the potential residential capacity of the site is reduced.

The policies do state that “some small-scale offices and leisure will also be appropriate”, and this language is consistent between the RCAAP and Local Plan. The policies could be read as

not absolutely requiring these uses to be provided. However, of importance is that the Reading Station Area Framework does identify that one part of the site should provide an active frontage, enlivened by active, public uses at the ground floor, and these uses are further defined in paragraph 9.8, which would include uses falling broadly within the 'leisure' classification (e.g. A3-5 and D2). The RSAF supplements both the RCAAP and the Local Plan, and it is therefore clear that policy expects some active leisure use to enliven key spaces. Figure 5.3 of the emerging Local Plan also shows "activation of key routes and spaces with town centre uses" in the same location.

The justification for not providing these leisure/town centre uses is considered to be lacking. There are parts of the site that it is considered would significantly benefit from some ground floor active uses to enliven public spaces and make the most of this critical riverside site. The corner of block D facing the open space is the obvious opportunity, and would correspond to the area of active frontage shown in the Reading Station Area Framework and Local Plan. A ground floor active use here, e.g. café etc (which would fall broadly within the leisure aspect of the allocation) would also significantly help to draw visual attention to the route through the site when coming from both north and south, and would contribute to the success of that route.

Consequently, the information submitted seeking to justify a residential only scheme is not accepted by officers and, moreover, it is reiterated that leisure/office uses should be incorporated within your emerging proposals. This is for the reasons set out above and in accordance with the adopted/emerging policies and the adopted guidance. Officers would welcome pre-application discussions at the next meeting demonstrating your initial ideas about incorporating this within your emerging proposals.

Public realm and landscaping

The success of the link through the site is acknowledged to be critical to the proposal complying with policy. A high-quality link through the site connecting the Christchurch Bridge to pedestrian routes to and through the station is a top priority for the site. First, the introduction (in contrast to the proposals prepared for discussion as part of pre-app meeting 1) of a level connection into Christchurch Bridge is a very welcome, and crucial, element of the scheme.

However, a number of concerns are raised in relation to precisely how the proposed route would work in practice.

Initially, separate from the concerns raised in the bulk, scale and massing section above, it is noted that both north and south extents of the link show buildings spanning above the entrances. Significant concerns are raised with how that affects the overall quality of the link, both in terms of the visual connection through the site when approaching from the north and south, and the effect on the public realm within from being almost fully enclosed. In

addition, as already detailed in the bulk, scale and massing section above, this results in a very large building mass to areas to the north and south.

Secondly, there is the relationship between the vehicular and pedestrian element of the route through the site. Officer's initial concern revolves mainly around how these relate to one another. Some of the initial drawings, e.g. on p43, seem to show a barrier (either hard or soft) separating the two, but officers consider it to be vital that the link should be visually open to make it as wide as possible. Some planting down the middle would be appropriate, in order to achieve the green link element of the policy, but it should not form a physical or visual barrier. If the pedestrian route is entirely separate, it appears from the diagrams that it would be quite narrow and not the more open link anticipated in policy. It is also not clear at what point the levels between the two changes in order for the vehicles to access the undercroft car park and for pedestrians to access the bridge, but ideally this should be as late as possible to keep this link wide. It is perhaps pertinent to note at this juncture that solely from a Transport Planning perspective, the width of the route being at least 3m is acceptable in transport terms. However, my transport colleague notes that any future application will also need to identify a crossing detail between the path adjacent to Block B and to the entrance between Block A & B. There is an obvious potential conflict between pedestrians and motorists at this point and various steps will need to be taken to demonstrate that this is possible / appropriate (as opposed to a solely pedestrianised route through the entirety of the site with no potential conflicts with motorised vehicles).

Thirdly, the northern end of the site winds to some degree around buildings in order to meet the Christchurch Bridge directly. It is understood why this is necessary if the SSE equipment is retained, as the alternative is that the route meets the river at a different point and does not provide the visual link. As the visual link is critical, it will be important to see images of how the visual link to the bridge and from the bridge into the site will be experienced and to what extent it is obscured by buildings - at what point does it become visually clear where the route further to the north and south goes? This is not immediately clear from the existing images submitted prior to the pre-app meeting, but appears from the imagery provided at the meeting to be available for submission/consideration as part of future meetings (i.e. can the 'walk-through' moving visual information be provided to officers in advance of future meetings, to provide officers the ability to view the proposals from multiple vantage points, rather than the 'still' points provided to date?).

Fourthly, it is noted that the quality of the screening of the SSE equipment will be critical to the success of the link. The proposals for public art at this point have merit, but there will need to be significant detail of what is proposed, how it will be secured and maintained at application stage.

Accordingly, whilst the principle of the level connection into Christchurch Bridge is very welcome in principle, there are a number of details which require further consideration as the proposals progress.

It is also noted that you should be aware that a Town Centre public realm strategy is in the very initial stages of coming forward. This site will be an important component of that and will need to be factored into future discussions as they develop.

Open space

From a planning policy perspective, the position of the open space at the northern end of the avenue broadly accords with that set out in the relevant policies, but it is not entirely clear whether this is to be true public space or communal space for the flats? The RCAAP and Local Plan expect public open space to be provided in this location. The amount of space shown is fairly limited and ideally there would be some opening up of the northern extents of blocks C and D.

Similarly, it is not abundantly clear whether the riverside gardens fronting the Thames would be private for either individual/communal flat occupiers or publicly accessible? Although it is acknowledged that there is a need for some private amenity space, it may also be possible for a small element of that space on either side of the bridge to be public and directly open onto the towpath, possibly stepped down from the avenue? This could assist in opening up this space?

Following on from this, the Leisure and Recreation officer accepts that, given the constraints (size and density) of the proposed development, there is limited scope to provide a LAP, LEAP, NEAP and/or MUGA on-site. Furthermore, it is considered that the inclusion of a pocket park does not fit into any of these categories and will only go a small way to providing some green space within the development. The podium courtyard area illustrated to the north west of the site will offer little in terms of quality and will be likely to be in the shade for the majority of the day.

Accordingly, owing to the continued lack of public open space in the proposals, it is evident that the development fails to meet recommended benchmark guidelines for the provision of equipped/designated play space which should be provided on site. It will therefore be necessary to seek a financial off-site contribution to nearby leisure facilities as referenced in our original response in order to make this application acceptable in planning terms.

It is considered to be unquestionable that the new residents will make use of the parks and open spaces north of the river and so investment must be made to extend/enhance these facilities, catering for the increased usage arising from this development. It is considered that owing to the nature of the proposals and the physical proximity of the site to the open spaces, that this contribution can justifiably be sought/received via s106 legal agreement in this instance. Officers will welcome your responses and suggested contribution in future pre-application discussions.

Landscaping

Turning to reference specific comments from the Natural Environment officer regarding the landscaping proposals, it is summarised that there are some improvements to the scheme (compared with pre-app meeting 1) as far as landscaping is concerned; that mainly being the increased landscaping provision of the River frontage, including tree planting, and the provision of the pocket park. Whilst the riverside planting will help to break up / soften the northern elevation of the proposal, again given the significant scale of the buildings, it is questionable how successful this will be.

It is noted that there is a private courtyard garden for residents of Block D, but this has not been shown in the context of the massing drawing from the Pre-App document (whereas in contrast it is shown in the Landscape Strategy document). Similar to comments made by others, officers will obviously need to be mindful of the degree of 'usability' of the space as a result of shading from the surrounding buildings.

The species palette provided is noted, but it is also seen that research into the 'local palette' is intended before final species choice; this is recommended and it is advised that input / comment from officers on this at future pre-application discussions would be welcomed. It is also recognised and broadly supported that planting, particularly on the riverside, will be aimed at providing biodiversity value. Again, it would be advised for officer input on this prior to application stage.

It is considered that the biodiversity enhancements suggested in the Landscape Strategy will be positive and it is assumed any future application will demonstrate the practical inclusion of these. For example, it is noted that green and brown roofs are deemed as possible and it will be expected for these to be indicated on future plans, with detailed sections and details (also including maintenance and management) expected should you not wish for these details to be secured via condition.

Housing standards & Unit Mix

In this regard you have briefly outlined that you are seeking to deliver at least 5% of the units as 3-bed dwellings, with a good mix of 1 and 2 bed units (attempting to achieve the policy requirement of a maximum 40% 1-beds, but this is currently proving 'a little tricky'). Officers can advise that the provision of at least 5% 3-bed units is welcomed and expected (in line with Policy RC9), while the provision of over 40% 1-bed units would only be considered appropriate should it be clearly demonstrated that this would render a development unviable (again in line with Policy RC9). In this latter regard you are advised that should you subsequently propose a non-policy compliant mix, then separate viability assessments detailing 'a policy compliant mix' and 'the proposed mix' would need to be provided to evidence this, which would then be subject to independent review at assessment stage by the local planning authority.

No specific commentary has been provided regarding housing standards. Accordingly, in very general terms it is advised that you should seek to propose units in line with the [nationally](#)

[described space standards](#). Although these are not yet adopted by the local planning authority, they will be once the new local plan is adopted. Furthermore, other matters to consider in this regard include the expectation for a proportion of wheelchair adapted / adaptable units to be provided, all Policy DM4 considerations to be taken into account and private and communal outdoor space to be provided in line with Policy DM10. Moreover, linked to this matter are the sustainability/energy credentials of the proposals, with decentralised energy provision expected for a proposal of this nature. Furthermore, it is advised at this early juncture that the sustainability/energy requirements within the emerging new local plan are far more stringent than those currently within the adopted policy. As such, this should be factored into your approach at this stage, as any future proposal is likely to be determined once the emerging local plan has been adopted (and therefore those policies, rather than the currently adopted local policies) will apply.

Affordable Housing

In this regard you have reiterated Berkeley's intention to deliver 30% of the units as affordable housing on site. You have understandably caveated this on the basis of the quantum of development / quantum of demolition permissible at the site, at which point you will cost/test viability.

In light of this matter being at its earliest stages, officers can only reiterate the policy requirements regarding affordable housing, as set out at adopted policy CS16 (30% on-site provision, unless viability justifies a lower contribution).

It is also advised that the need for affordable housing in the borough remains absolute (as demonstrated by affordable housing being justified through local circumstances on small sites under 10 units, despite the NPPF, as backed by numerous Planning Inspectors when tested on appeal). In terms of the tenure split, Housing needs dictate that in practice officers seek a 70% rented / 30% shared ownership split, albeit the adopted SPD references a 50/50 split. Furthermore, affordable housing continues to be in the forefront of elected members minds when considering proposals at Planning Applications Committee.

Please note that when recent cases have been considered at Planning Applications Committee without a policy compliant level of on-site affordable housing, deferred affordable housing contribution mechanisms have been included/secured, so viability can be re-appraised at a later date during the construction programme. Moreover, it is becoming increasingly frequent to include a clause via s106 whereby should the building subsequently be extended / altered (to create further units) or units subdivided then contributions to affordable housing would apply on a cumulative basis. Another element, as secured via condition or legal agreement, is to manage the number of bedrooms within units, to ensure that additional bedrooms are not added to units at a later date (which if it occurred could improve the viability of the scheme).

It is strongly advised that more detailed affordable housing discussions are frontloaded into the pre-application discussions as early in the pre-application discussions as possible,

together with (if appropriate) viability methodology matters (for which there is a separate pre-application charge).

Ecology

The Council's Ecology consultant has confirmed that the proposals are an improvement from the previous plans as the buildings are set back from the river, and have smaller windows. As such, it is likely that light spillage and overshadowing will be less, although assessments will still be required in these regards to demonstrate this, given that the buildings are significantly different to the existing context.

No ecology report has been provided so previous comments at pages 9-11 of the advice from pre-app meeting 1 remain unaltered.

Flood Risk/SuDS

In terms of flood risk matters, you are encouraged to formally engage the Environment Agency at pre-application stage for detailed advice. In the first instance I would advise you to email Planning_THM@environment-agency.gov.uk The Environment Agency will be a statutory consultee at the time of any future application at the site.

Regarding SuDS, full details of your proposed strategy will be expected to be submitted at application stage. Given the existing context, it is considered likely that SuDS will be an area where a tangible planning benefit could occur as a result of the proposals. Accordingly, you are advised to carefully consider your emerging strategy in this regard.

Highways and parking

As already outlined above in the public realm section above, it is reiterated that from a transport perspective the principle of the link from the bridge is supported, subject to this being at least 3m in with and the crossing details between blocks A & B being provided. It is advised that all other previous transport based comments from meeting 1 remain relevant.

In respect of the Technical note, officer comments were not provided at the meeting and are instead summarised below.

First, it is advised that the proposed Toucan crossing appear acceptable in principle in itself from purely a transport perspective, subject to further review (and clarification as to how this aligns with land to the south and the direct connection to the station; furthermore, this is notwithstanding separate comments above relating to the layout / locally listed building). However it is noted that the proposed design does not include the provision of a replacement dropped kerb for cyclists at the exit to the retail park and how this will link to the dropped kerb opposite? In addition, no details have been provided to identify how this proposed toucan crossing relates to the development and in particular pedestrian access to the site.

These points would need to be included when a full application is submitted and it is strongly advised that they are subject to future pre-application discussions.

In terms of trip rates, these have been calculated for the residential use by using the Trip Rate Information Computer System (TRICS) and Census data to ascertain modal split and is acceptable in principle. However, in reviewing the TRICS data it is noted that some sites had been deselected when they would appear to be acceptable in terms of location and public transport. Although these sites may have been deselected due to car parking levels, this would not be appropriate in this case given that the modal split is being dealt with by way of the Census data. Therefore, please instead see more appropriate trip rate assessment data attached - you are advised to consider this and liaise with transport officers if you have any queries. For information the deselection reason of 1 relates to inappropriate in terms of public transport and / or location.

Although transport officers are happy to accept the Census data to ascertain modal split, clarity would be need to ascertain exactly what area this data covers and it would need to confirm that the parking provision for the Census data is similar to that of the development.

The existing vehicle use has been determined by actual survey data and is deemed acceptable; however it would also need to be clarified what level of vehicular activity would remain given that half the site will remain, which will include access to parking areas.

Accordingly, you are advised to take the above into account when advancing your proposals. Officers would welcome further discussions regarding these matters during the pre-application process.

Community Engagement Update

The update is duly noted and it is advised that officers continue to be informed on these matters during the pre-application process.

Concluding remarks

In conclusion, based on the latest information submitted, there are still considered to be numerous significant concerns raised in relation to principle matters, such as the demolition of the locally listed building and the scale/massing/footprint of the proposed buildings. It is also acknowledged that the continuation of Christchurch Bridge into and through the site is broadly welcomed and supported as a positive step in principle, although a number of detailed matters arise in this and other related regards too. Accordingly, it is considered that although some progress has been made in comparison with pre-app meeting 1, you should be under no illusions as to the continued concerns of officers, for what is an extremely challenging site (mainly a result of the red line boundary of the proposed site, in comparison with the wider site allocation in adopted/emerging policy and guidance).

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

Attached: RBC Transport trip rates information

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.	
Consultee:	Historic Buildings Consultant	Dated:	23-1-19
Ref:	Pre-App 181724		
Proposal:	Re-development of former SSE site including demolition of a number of structures including locally Listed building and 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.		
Location:	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 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 *Reading Station Area Framework* (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 new 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...".

Reading Borough Council is preparing a new Local Plan, which will replace the above documents. The following policies are applicable:

EN1: Protection and Enhancement of the Historic Environment

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

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers. Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

EN4: Locally Important Heritage Assets

Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.

Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.

Proposals

The proposed re-development of the former SSE site on Vastern Road, involves the demolition of a number of structures including a locally Listed Building and the erection of a series of buildings to form a residential scheme of from between 2 and 11 storeys with a new north-south pedestrian link connecting Christchurch Bridge to Vastern Road towards Reading Station.

The site contains 55 Vastern Road, which is a Locally Listed building. No. 55 Vastern Road was locally listed as an example of an early 20th century office building built as part of the former industrial depot complex on Vastern Road. The building 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) and designed by the locally prominent architectural practice of Albury & Brown. F W Albury also designed the Grade II Listed Caversham Caversham Free Public Library and the Grade II Listed. The former is particularly reminiscent of 55 Vastern Road and is designed in what has been termed in the listing as an " *irregular red brick and stone sub-Voysey style with tiled roof*".

The Heritage Statement also indicates that the 1894 share issue prospectus for the Reading Electric Supply Co. Ltd shows that Albury was one of the company's directors, and thus there is every chance that his firm was responsible for the design of all its buildings. Moreover, local newspapers record that, in 1892, Mr Elisha Albury presumably some relation had established the 'Vastern Road Horse Repository'. The precise location of this enterprise is not known, but clearly the Albury family owned land here before the establishment of the Electric Works.

The new stores for the Reading Electric Supply Company were built at Vastern Road in 1903, and that these were designed by the architect Frederick William Albury (1845-1912). Albury was therefore working at the site and had many connections with the company. The locally listed building at 55 Vastern Road, which is reminiscent of his style, is therefore likely to have also been designed by Albury.

The Heritage Statement states the building at the eastern end of the present No. 55 Vastern Road was probably built as a new entrance for the Electric Works, with the eastern side of the building accommodating a carriage arch.

As detailed in the Heritage Statement, Kelly's Directory of Reading for 1909 gives the occupants of No. 55 as E. Rowley Hill and the Reading Electric Supply Co. Ltd. The 1912 edition provides the same listing but adds that E. Rowley Hill was the company's engineer and manager. It seems reasonable to suggest that Hill, who retired in 1915, was provided with on-site accommodation in the entrance building as part of his appointment.

Discussion

As part of pre-application meeting it was recommended that options to retain the Locally Listed building were examined together with the re-directed pedestrian link-path, but this has not been included as a separate option. The proposed justification for the demolition involves the benefit of the proposals in relation to the public benefits of the scheme against the heritage value of the site. However, in this case, because of the preparation and publication of Reading Council's criteria and process for local listing, greater weight should be to the conservation of this non-designated heritage asset in the planning balance.

It is proposed to root the proposed building in the character of the locality by including proposals to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block following its demolition. However, this proposal would do very little to mitigate the effect of demolishing the locally listed building and or its replacement with a large-scale building of 11 storeys.

As stated in the NPPF, 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.

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.

Conclusions

The proposed development would result in the demolition of a locally listed building which would amount to substantial harm to the locally listed building. The building's architectural style and aesthetic value, plus associations with the Albury & Brown architectural practice are acknowledged. The reasoning for local listing by Reading Borough Council still stands. It is therefore recommended that 55 Vastern Road, which is representative of Reading's built heritage, enhances its sense of place and is a building of townscape importance, should be incorporated into the final design.

Summary	Please see above.
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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