



Reading
Borough Council

Working better with you

Kim Cohen
Planning Partner
Barton Willmore
The Blade
Abbey Square
Reading
RG1 3BE

Via email only: to kim.cohen@bartonwillmore.co.uk

Frances Martin
Executive Director for Economic Growth
and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787

Our Ref: 181724/PREAPP

Direct: ☎ 0118 9372458

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

7th October 2019

ADVICE WITHOUT PREJUDICE

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

Dear Ms Cohen,

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 & the erection of a series of buildings to form a predominantly residential scheme (this submission states this to be 224 residential units - 59x1, 155x2 & 10x3-bed units) with a standalone cafe and also including a new north-south pedestrian link connecting Christchurch Bridge to Vastern Road towards Reading Station.

Pre-application meeting number: 5 (Meeting on 03/10/19)

Information considered: 'The Old Power Station, Vastern Road, Reading' (as presented to ward councillors on 24/09/19); 'The Old Power Station, Vastern Road, Reading Pre-Application Design Booklet 03 October 2019', as submitted 27/09/19. 3x cycle footway drawings presented at the meeting on 3rd October.

Those in attendance at the meeting: Caroline McHardy, Dave Taylor, Joe Harding & Tom Nicholas (all Berkeley Homes); Kim Cohen (Barton Willmore); Daniel Townsend & Ellen Few (PBA); Jonathan Markwell, Darren Cook & Sarah Hanson (all Reading Borough Council).

This meeting represents pre-application meeting 5 in association with emerging proposals at part of the SSE site on Vastern Road. The pre-application discussions were paused at the request of the prospective applicant in early June 2019 as a result of an internal reorganisation at Berkeley Homes. Based on the information submitted it is evident that the proposals have been reappraised, with significant changes made in comparison with previous iterations. It would appear that these seek to address various (and substantial) unresolved issues or concerns previously raised by both the local planning authority and Design South East (d:se).

This response details the matters discussed / feedback provided at our meeting on 3rd October. For ease of reference I have split this feedback up into sections, whilst noting that there are many matters which overlap.

Update on the new local plan

As you may already be aware, the New Reading Borough Local Plan is at an advanced stage. The Inspector's report into the Proposed Modifications has now been received and the new local plan is proposed to be formally adopted by the Council on 4 November 2019. Please [use this link](#) to view more information regarding the new local plan. As any future application at the site would be determined once the new local plan has been adopted, it is advised that you consider your future proposals in line with the new local plan policies, rather than the soon to be superseded Council's LDF Core Strategy (2008, Altered 2015), Reading Central Area Action Plan (2009) and Sites and the Detailed Policies (2012, Altered 2015).

You are advised that there are a number of areas where policies are more stringent than existing - e.g. sustainability / energy, wheelchair housing, lifetime homes. As such, you should be fully aware of this in advance of your submission.

North / south route & related shared space / layout matters

It is noted that significant changes have been introduced to the north-south route, with this now seeking to become a single shared vehicular/pedestrian/cycle space. Instead of a long ramped space, a switch-back is included and a separate pedestrian route (with steps) is created from the riverside. In general terms, the resultant route appears to seek to address a number of previous concerns raised, in particular those raised by D:SE in terms of better connecting with the river and being a more legible and public route. However, in reviewing the information submitted in more detail, a number of key concerns have been identified:

- There appear to be a number of 'pinch points' through the north-south route, where the distances between blocks appear insufficient. In particular the 8.8m distance at the Vastern Road end of the site and the (unspecified) distance in the middle of the site between the 2 & 3.5 storey buildings. In terms of spacing and layout considerations, significant reductions in the built form (either a reduction in the footprint or chamfering) need to be introduced (at the northern and southern ends of the 3.5 storey block; and, at the southern end of the 4 storey block) to more suitably emphasise the north-south link and achieve a route between the station and river which accords satisfactorily with the Policy CR11 vision and objectives. Increasing the width of the route and easing these pinch points would also have the benefit of reducing crime / fear of crime by removing sharp corners on a public route and providing a meaningful sized public space on Vastern Road. Having considered this further, the likely reductions required in the footprint of the 3.5 storey single-aspect mews building (also considering the turning head difficulties separately raised below)

are such that officers advise that it would be prudent to explore options without this building included in the layout of the site; instead it is suggested that landscaping / public open space / public art may be more suitable at this point, which would also assist in ensuring that a direct landscaped link between the station and the River Thames is created (as required by Policy CR11v).

- Moreover, transport colleagues advise that a 3m dedicated route should be included through the site; the scheme currently includes a shared surface in the centre of the site that would not be acceptable (please also bear in mind the access officer comments fed in with pre-application meeting 3 advice). It appears that the shared surface is 8m in width but this could allow for a 3m wide footway / cycleway and a 5m wide carriageway, although the parking spaces would need a 6m forecourt depth, this could be provided by shifting the parking up against the western boundary. It is advised that you explore the various options further.
- Furthermore, RBC Transport advises that the footway / cycleway should be direct and should avoid the switch-back deviation (noting that this was specifically not included within previous versions of the scheme) in order to achieve the direct link envisaged by policy. If a switch-back is proposed, the technical justification as to why this option is considered necessary/unavoidable (highlighting implications if a direct route is provided) should be detailed in full.
- The gradient of any ramp to Christchurch Bridge should be in accordance with the DfT document, Inclusive Mobility.
- At the meeting three further options were provided identifying a dedicated footway / cycleway through the site. Although Option 3 is considered to be the most appropriate as it includes a 3m wide footway / cycleway, following a more detailed review, it is noted that the design includes a carriageway width of 4.2m. In accordance with the DfT document Manual for Streets, the minimum carriageway width would need to be 4.8m so that this could accommodate the two-way movement of a car and a service / refuse vehicle. Accordingly, you are advised to continue to explore various other solutions at this point.
- With specific regard to the space between the 2 and 3.5 storey buildings, significant transport-based concerns are raised by virtue of the turning head location resulting in vehicles reversing over the footway / cycleway (thereby leading to potential safety conflicts) and therefore this is not considered to be acceptable (Policy TR3). It would appear that the available visibility for a driver undertaking manoeuvres to the north of the building located on the east of the shared surface would be minimal and would result in conflicting movements on the shared surface street. The turning head should be located away from the pedestrian / cycleway route. On the basis of these concerns, it is clear that there are potentially unresolvable conflicts between pedestrians, cyclists and motorists at this point of the site due to the layout proposed and significant revisions to the approach shown are required. This could involve altering vehicular movements across the site and/or reducing the footprint of buildings at this point. As well as reducing the footprint of the 2 storey building (as tabled at the meeting), it may be that the 3.5 storey building should also be reduced in footprint too, for safety reasons.

- The Transport team also advises there are two instances where accesses are required to cross the proposed footway / cycleway. Therefore detailed design must demonstrate how pedestrians would be given priority over vehicles to avoid conflicts. This is another potentially fundamental concern, with the onus on you to demonstrate how this conflict could be addressed in the scheme. Ideally there should be no potential conflicts between pedestrians/cyclists and vehicles, with a variety of mechanisms possible to achieve this.
- It is noted that d:se commented on the provision of an additional link to the towpath. Officers as a whole broadly welcome this now being included, but Transport officers are clear that the provision of steps is not acceptable. A link should be provided to an acceptable gradient as stipulated within DfT document, Inclusive Mobility. Should your future proposals continue to include a stepped element then evidence demonstrating why a step-free route is not possible should be detailed in full for consideration by officers (Policy CC7).
- During the servicing of the site from within the turning head it would need to be confirmed that access and egress can be retained for the basement parking area and that the 60° parking (included within the three further options) can still undertake turning manoeuvres within the turning area.
- The design should ensure that it would not be desirable for drivers to reverse over the 3m footway / cycleway. Any proposal that will lead to the potential for this will require a full height kerb to delineate between the two.

As such, although on first glance the now proposed scheme may be seen as an improvement, in further considering the proposals in detail there are a number of potentially fundamental concerns which may require significant revisions to the scheme as a result.

Level of landscaping on the link between the station and river

This site lies at a strategic junction on the southern bank of the River Thames and Reading Station. Concerns are raised that the level of landscaping to the south of the 1/2/3 storey building is sporadic, rather than a fully integrated aspect of the scheme's design - as required by Policy CR11v. As per the comments in the section above, the removal of the 3.5 storey block and replacement with landscaping at this point could help achieve this policy requirement.

Moreover, the Natural Environment Officer has emphasised that d:se stated, *“Bolder use of landscaping especially creating a street-scale volume of trees would give a clue that here is the street/route to take to get to the river. Such a powerful landscaping gesture could continue south to accentuate the route and to fulfil the Council’s aspiration for a green route from river to station”*. It seems that the change in the design of the link, i.e. into zones and not as ‘straight’, has resulted in the loss of the ability to create a clear tree/landscape-guided route. Accordingly, improvements are considered necessary for the design to accurately fulfil the policy aspirations for this site.

Massing

Only limited information (CGIs and a site / floor plan) has been submitted and this is insufficient to provide clear and informed advice on this matter. Prior to the meeting, wider street / river scenes were requested, but were not included in your submission of 27th September. Accordingly, it is not possible to provide any comfort at this point in time as to the appropriateness of the massing now sought. The following initial comments are made, however:

It is clear that in comparison with previous iterations of the scheme, some significant changes (including increases in massing in some areas and reductions in others) have been made. At the Riverside, the eastern element has altered from 11 (meeting 1) to 9 (meetings 2-3) and is presently 10 storeys. The western block has altered from 3&7 (meeting 1 & 2) to 4-6-8 storeys (meeting 3) and is currently 4&8 storeys. It is initially noted that at meeting 3 it was advised that the massing at that time was very substantial and could appear particularly dominant within this sensitive riverside setting. Although the spacing between buildings appears to have increased, the massing (in crude storey level terms) has as well. Accordingly, further supporting information will be required in order to fully assess the appropriateness of the massing and its effect on the Thames riverscape/environs.

Similarly on the Vastern Road frontage, there are areas where the proposed massing appears more substantial than previous versions of the scheme. To the east the massing has increased from 8&11 (meeting 1) to 6-8&11 (meeting 2), to 6-9-11 (meeting 3) and presently 9&11 storeys. Accordingly, further elevation plans / visualisations to show the proposals within its wider context will be required to justify the massing now proposed. A similar conclusion is reached in respect of the western side Vastern Road block. This has been subject to the most change during the various versions of the scheme, from 5&8 (meeting 1) to 5-6&11 (meeting 2), 3-6-8 (meeting 3) and now a uniform 6 storeys. As such, a likely concern is the abrupt transition of 6 storeys at the closest points to the smaller-scale of the existing Vastern Road and Lynmouth Road terraces. All previous iterations intentionally stepped down to 5 or 3 storeys, whereas in contrast this proposal is higher at 6 storeys. Accordingly, more information is required in this respect in order to more fully assess this.

In the middle section of the site there have been significant changes in the layout, meaning a pure massing comparison is not appropriate. Limited detail has been provided in terms of the massing of these blocks and how these interact with other blocks within the site. This should be provided to enable informed feedback to be provided.

Design approach

Based on the information provided, the focus of this pre-application advice has understandably been on the footprint / massing and related matters, rather than the architectural approach and detailed design matters. It is noted that a link back to the historic power station's roots of the site is being advanced, with the overall feel not dissimilar to

design approaches taken elsewhere, such as on the King's Cross site in London. In principle, it is considering that advancing a design approach with links back to historic uses would broadly be considered appropriate.

Given the significant changes in the scheme it is considered to be essential for the proposals to be further considered by Design South East (d:se) in the future. Officers consider that this should ideally take place after any next future meeting with officers, once you have reflected and responded to the feedback provided in this response. At the meeting you outlined the possibility of engaging d:se once the future application had been submitted. Officers can advise that, for the purposes of neatness from all perspectives, it would be far preferable for d:se to be engaged further at pre-application stage. Should you wish me to help facilitate correspondence with d:se, please let me know.

Comprehensiveness

In line with Policy CR11, there is a requirement for you to demonstrate that the proposal is part of a comprehensive approach to the riverside sub area and that it does not prevent neighbouring sites from also fulfilling the aspirations of the policy.

For example, land to the east owned by SSE is, like the application site, is within the same CR11g allocation. Whilst it appears that no windows are proposed on some of the facades facing this neighbouring site, this does not appear to be the case in all instances, with the riverside block appearing to include east-facing windows and the north elevation of the block fronting Vastern Road reliant on windows at close quarters to the neighbouring site. As such, it is concerning that the layout/detailed design of your proposed site may prevent the neighbouring site from fulfilling the aspirations of CR11. This is as the proposed layout may limit the developable area of the neighbouring site, either through overlooking distances needing to be respected, or more general needs for relief (from the proposed buildings) to provide suitable levels of outlook for future occupiers of any development at the neighbouring site (given the remainder/residual of the residential allocation). Accordingly, it is considered that the onus is on you to demonstrate that the proposed development would not preclude the comprehensive redevelopment of the sub area. At the present time, officers have severe concerns in this regard based on the information submitted.

These matters link into previous advice concerning why only part of the site allocation is coming forward, rather than the entire site. Please note that at the time of the pre-app meeting 3 advice, officers were still seeking more comprehensive responses to satisfy themselves in that regard. This remains the case at the time of writing.

Level of active frontages along the north-south route

It is unclear on first glance whether the north-south route is activated by individual front doors leading directly into units along the route at grade, for the benefit of the community and associated natural surveillance etc. At present, it appears to these are standardised

blocks with single entrances, which may be a missed opportunity. You are advised to explore this further across the site.

Continuing on this point, it is once again suggested that individual front doors / amenity spaces are introduced for ground floor Vastern Road units, to provide an acceptable balance in the shared street between animation and defensible space. This issue has previously been raised (most recently pre-app meeting 3 p4-5 of advice) and not satisfactorily evidenced as to why this cannot occur to date.

Access in the north-west corner of the site

It appears from the information provided that a gated access point is proposed in the south-west corner of the “coal drop building”, possibly acting as a primary entrance point to the river fronting block. Accordingly, it is suggested that part of the proposed development would in effect become a gated community? It is questionable whether this is an appropriate design response, with the promotion of mixed and balanced communities highlighted and the strong preference for design solutions to overcome the need for gating. As such, you are strongly advised to consider the various options which may result in gating not being required. At the meeting you provided reassurance that a main entrance point off the main north-south route would be provided; future detailed floor plans will hopefully confirm this.

Following on from this, it is noted that a small gap is included between the north-west 4 storey block and 1-6 Lynmouth Court fronting the riverside. It was queried at the meeting whether active measures should be included to prevent access from the rear access entrance to the riverside (and vice versa) at this point. You confirmed that the area would provide amenity space for the corner ground floor unit. This will need to be shown at application stage, as the possible concern is for this to become a cut-through, with potential harm to the amenity of existing and future occupiers as a result. Accordingly, this should be explored further.

Impact on Lynmouth Court and Lynmouth Road properties

Naturally any proposal of this nature would need to demonstrate that it would not have significant adverse amenity impacts on any existing neighbouring / nearby occupier. Your future submission will need to demonstrate how the various policy requirements of Policy CC8 (including day/sunlight and wind assessments - which would be subject to independent review at application stage, as funded by the applicant) would be met. In terms of specific comments in relation to the current version of the scheme, my specific comments at this stage are as follows:

- Is the potential impact on day/sunlight to 1-6 Lynmouth Court from the 4-8 storey building suitable (given previous iterations were smaller at 3-7 or 4-6-8 storeys)?
- No information has been provided in terms of the distance between the western elevation of the 1/2/3 storey “coal drop building” and the rear (eastern) elevation of

Lynmouth Road properties. Although these are specified as not including windows, by placing buildings close to the site boundary it could result in unacceptable outlook / sense of enclosure impacts for Lynmouth Road occupiers. This should be clarified/confirmed, to enable a full assessment.

- In terms of the 3.5 storey building, I am content from an overlooking/privacy perspective that a 14.3m distance to the boundary and 24m window to window distance would be considered suitable. It would be beneficial for elevations / perspectives from the rear gardens of Lynmouth Road properties to be provided to assist in officers' consideration of the impact on outlook / sense of enclosure (bearing in mind the increase in massing from 2 storeys on the boundary - as per previous versions of the proposals - and 3.5 storeys at a greater distance away)
- Potential outlook / sense of enclosure issues to the nearest units from the 6 storey element on the Lynmouth Road / Vastern Road junction.
- Potential overlooking from the six storey north elevation of the Vastern Road block towards Lynmouth Road gardens (distance not provided) - the internal layout of the units proposed should seek to minimise impacts at this point.

Quality of accommodation for future occupiers

Similar to the commentary regarding the potential impacts on neighbouring occupiers, another important consideration is ensuring the future occupiers enjoy a suitable standard of future amenity. In terms of specific comments in relation to the current version of the scheme, my comments at this stage are as follows:

- There is a specified 14.9m distance between the 6 storey element of "the turbine hall" and the 3 storey element of the "coal drop building". Furthermore, both of these blocks are shown to include predominantly single aspect units, which would directly face one another (at a distance of 14.9m). This is significantly below the 20m window to window distance expected and with no other relief/outlook, this therefore represents a significant shortcoming of these units. It is considered that this limited distance will significantly compromise the quality of accommodation proposed and you are strongly advised to explore other options in order to increase this to an acceptable 20m distance.
- It is not clear whether harmful overlooking would occur for directly facing windows at 8.8m (between the Vastern Road blocks).
- More generally, given the number of edges and connecting 'L' shaped blocks, there is potential for harmful overlooking / insufficient privacy at close distances in the inward facing corner units - once block by block plans are available a more detailed assessment / comments can be provided.
- The day/sunlight within the proposed units is unproven (and will naturally be reliant on a future assessment);

- It is unclear what the number/proportion of single-aspect north facing units is? However, it appears numerous from the single floor plan submitted and should be further explored, with view to obviously minimising as far as possible such instances.

Heritage

The proposals continue to seek the demolition of a locally listed building. As per previous advice, this remains a concern for officers and would ultimately form part of the future 'planning balance' in the assessment of any formal application. Previously the proposals sought to include echoes of the locally listed building in the proposed design approach at parts of the site; on first glance this does not appear to be continuing in the current iteration of the proposals. Naturally it would be anticipated that your future full submission will pick up on all relevant heritage matters at that time.

Standalone café

Officers welcome the principle of a small café unit within a standalone space and consider that this has the potential to be an attractive benefit of the emerging proposals. In principle this would comply in providing the "small scale leisure" component referenced in the CR11g allocation. Obviously it will be for you to detail to exact use(s) sought (it could be that flexible uses could assist the attractiveness of the unit to potential future occupiers) and, in particular, the servicing arrangements associated with such a unit in this location (which appears on first glance to be distant from vehicular access points). Officers would expect detailed information to be submitted to detail such practicalities, in order to demonstrate the suitability of the use in the location sought (or put another way, measures to ensure that it does not become difficult to let / becomes a vacant unit & possible negative consequential impacts).

Other RBC Transport officer comments

In addition to matters already referenced above, the following further transport based comments are raised:

- It has been requested that a strip of land be secured along the towpath to increase its width at the point at which the bridge adjoins the towpath. An exact depth has not yet been agreed but this will be provided as soon as an assessment has been undertaken. This is in order to make associated improvements to the towpath at that point.
- The proposals should include the location of the crossing point on Vastern Road and this will need to identify how this will link with the existing arrangements for the current retail park site to the south (who undertook a public exhibition event in September 2019 - Barton Willmore are the Planning Consultants). You are also strongly

advised undertake discussions with the owners of the retail park, SSE and the former Royal Mail site (80 Caversham Road) to establish that the access design does not conflict with any future schemes.

- The proposed crossing on Vastern Road would be the subject of a S278 Agreement to be secured through the S106 as specified in the letter to Barton Willmore dated 5th June 2019 (pre-app meeting 4 advice).
- A pedestrian link should be provided from Lynmouth Road to the access point of the flats located in the south west corner.
- Cycle parking should be provided in accordance with the Council's Parking and Design SPD.
- The proposed parking ratio has been agreed, although the following is stressed:
 - o Visitor parking would need to be provided on site in accordance with the Council's Parking Standards.
 - o 10% of the parking provision should allow for electric charging in accordance with Policy TR5 in the emerging Local Plan.
 - o Accessible parking should be provided in accordance with the Council's Parking Standards.

Other Natural Environment officer comments

In addition to matters already referenced above, the following further natural environment based comments are raised:

- Consideration of planting above the culvert. If feasible (depending on easement / access) then one larger raised landscape area rather than individual planters would be preferred.
- Both green walls and green roofs should be incorporated (the site is within an air quality management area)
- An Arboricultural Impact Assessment will be required (and for completeness, an Arboricultural method statement) for the existing street trees on the frontage. More specifically, this should consider the Vastern Road crossing works against the root protection areas of the street trees).
- Landscape principles should be provided on submission (including species, root volume provision).

- Large canopy trees should be provided wherever feasible. On the river frontage, there is a need to avoid planting in front of windows / balconies to limit future pressure to prune for views and light. Whilst large canopy trees would be preferable by the riverside, the 5-7m buffer (within the site itself - separate from the 10 total buffer required by policy) and avoiding conflict will mean more upright species are likely to be required.
- Native planting would be expected on the riverside; native and/or wildlife friendly elsewhere.
- Lighting impact needs to be considering, in ecological terms, as the new design has more window area and therefore potentially more light spillage onto river corridor (see previous ecology based comments, which remain relevant as to the impact of the proposals on the river).
- For information, species included on the under consideration 80 Caversham Road (182252) site are: Liquidambar (sweet gum); Betula pendula (Birch), Pyrus Chanticleer (ornamental Pear), Amelanchier (snowy mespilus), Acer platanoides (Norway maples). Whilst direct duplication into the adjacent site and Power station site is not prudent (to avoid too many of the same species), a few could be included to provide a landscape link.

Waste / refuse / recycling

Please ensure that you take into account the guidance regarding numbers, dimensions and distances to collection points. Should you wish to provide full details at pre-application stage I will seek direct observations from my waste services colleagues. As mentioned, new food waste collections and smaller bins are emerging in the Environmental and Commercial Services team, but this has not been formalised at the time of writing. Please advise me should you wish to be kept updated on this matter.

Residential mix of units

The residential mix - 59x1 (26.34%), 155x2-bed (69.19%) & 10x3-bed (4.46%) is acceptable in terms of 1&2-bed units, but includes a small shortfall in 3-bed units (2 additional 3-bed units would increase the amount to over the required 5%). In a scheme of this size and nature there is no obvious reason why the scheme should not be fully policy compliant. Should your future mix not be policy compliant, viability evidence would need to be submitted to demonstrate that it would be unviable to provide a policy compliant mix.

Affordable housing

There is no mention of this within your submission, although in the meeting with councillors last week you indicated that this was under consideration and subject to viability. This was reaffirmed in our meeting. Officers would welcome and encourage pre-application discussions regarding on site provision and should a viability route be taken, the methodology for this to be agreed in principle prior to submission (any viability submission at application stage would attract a separate fee, payable prior to validation/registration). At the same time, discussions regarding the type and tenure of on-site affordable housing would also be ideally discussed at pre-application stage.

Application content

Please revert back to pre-application advice dated 5th December 2018 for initial guidance regarding the submission requirements as part of any future application. Please also refer to subsequent meeting notes where some more bespoke information was sought to be included (e.g. evidence concerning the extent of the red line of the application site and justification as to why existing equipment cannot be moved from meeting 3). If you have any further specific queries, please advise me accordingly.

Concluding comments

It is welcomed that significant changes have been made to the scheme, which seek to address previous concerns raised throughout pre-application discussions. At the time of writing however, there are still a number of unresolved matters, a number of which are potentially fundamental to the future assessment of any application at the site. Further pre-application discussions are considered to be necessary (and would be encouraged) with view to seeking to advance and hopefully address the matters arising from this note (and other matters not covered but remaining relevant from the previous advice). I will await to hear from you regarding future submissions / meetings and further engagement with d:se.

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

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