

Statement of Case

Appendix 4

Update to Committee dated 31st March 2021
– prepared by RBC

UPDATE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 31st March 2021

ITEM NO. 8
Page: 51

Ward: Abbey

App No.: 200188/FUL

Address: 55 Vastern Road, Reading, RG1 8BU

Proposal: Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road

Applicant: Berkeley Homes

Deadline: Originally 15/06/2020; Previously extended to 18/01/2021; Now extended until 09/04/2021

Recommendation:

As in main report, barring the following changes (omissions denoted by ~~strike-throughs~~ and additions in bold and underlined):

- By virtue of its height, massing and proximity to the river, the development will shade the River Thames and impact on its marginal habitats. There would also not be sufficient space within the riverside buffer for a sustainable long-term relationship between the riverside buildings and the proposed new large canopy trees. The proposed development is therefore contrary to Policy EN11 in particular, and also EN12, CC7 and CR2, EN13, EN14, para 175 NPPF and objectives of the adopted ~~and revised the adopted*~~ Tree Strategy and Biodiversity Action Plan

AND that this reason for refusal is delegated to officers to consider further post-committee, subsequent to information presented by the applicant on 29th March 2021 (some of which relates back to the submission of information on 14th January 2021) being assessed by a variety of officers (as per section 5.4 of the update report).

* Inadvertent typographical error

- Lack of a section 106 legal agreement for affordable housing, ESP, open space contribution, carbon-offsetting contribution, various transport related works*, ecological mitigation contrary to Policies CC4, CC9, EN9, EN11, EN12, H3, H5, TR1, TR3, TR5 and the following adopted Supplementary Planning Documents: Affordable Housing (March 2021); Employment, Skills and Training (2013); Revised Parking Standards and Design (2011); Planning Obligations under Section 106 (2015); Sustainable Design and Construction (2019).

* Transport related works are detailed in full at paragraph 4.13.103 of the main report

1. Additional public consultation responses from local groups

1.1 Further to section 4.25 of the main report, Caversham and District Residents Association (CADRA) have made a further submission (written to the Chair of the Planning Applications Committee), stating they would like

to comment further. First, CADRA acknowledge their original comments are largely reproduced in the main report and related to:

1. The alignment, coherence and legibility of the new pedestrian and cycle route from the Station to the River
 2. Building heights adjacent to the River.
- 1.2 CADRA add that they had previously contacted the Planning Department in November 2019, not only in respect of this site, but also the adjoining Aviva and Hermes sites. CADRA highlighted the need for common urban design principles which should apply to these three connected and related sites which are in multiple ownership. This would include alignment of the route from the station to the river, a careful analysis of the potential for Views through from the station and the coordinated placing of buildings across the three sites, together with an integrated hard and soft landscaping approach to the public realm. This would optimise the outcome for the town. CADRA were concerned about the ad hoc and piecemeal nature of the proposals coming forward at the pre-planning stage.
- 1.3 **RBC's Reading Station Area Framework and the Reading Central Area Action Plan** also suggest such an approach and allowed for a direct link both visually and in landscape terms through to the river from the station. These frameworks possibly assumed the availability of all of the SSE site. If this is now unrealistic, the Framework needs to be revisited. Otherwise, the SSE, Hermes and Aviva schemes will make no sense and the Planners and subsequently the PAC will find themselves in continuing difficulty. And a major opportunity for the town will be lost.
- 1.4 CADRA suggest that a limited but detailed Urban Design and Public Realm brief should be urgently prepared by the Council to guide the detailed coordination of these sites, including the SSE site, in order to resolve the impasse that has been reached. We appreciate the resource limitations that the Council is under but believe this could be done quickly and effectively.
- 1.5 CADRA appreciates these comments widen out from the SSE site application 200188, but CADRA considers this application to be a critical part of that wider picture and CADRA hope that these comments are therefore both relevant and of use.
- 1.6 Officer response to CADRA's suggestion of an Urban Design and Public Realm Brief needing to be prepared is that development principles for how the area north of the station and through to the Thames have already been adopted and are set out in the current Reading Borough Local Plan 2019 allocation of Policy CR11: Station/River Major Opportunity Area and this follows on from the Reading Station Area Framework. The other policies in the Chapter dealing with Central Reading provide guidance on design, public realm improvements, nurturing leisure, culture and tourism in the town, the night time economy, residential accommodation and where tall buildings may be considered. It is the task for officers when engaging with owners and developers, ideally at pre-app stage, to make sure that they are aware of this guidance and the objectives that the Council are trying to achieve so that when they submit their development proposals they align with these.
- 1.7 However, the relevant sites are in different ownerships and officers have worked hard to bring the parties together to arrive at a position where the

various applications work together. Officers recognise that more still needs to be done but this work has been made more difficult by the developers being at different stages in their projects. The main thing is to make sure that the officers are consistent in their approach.

- 1.8 Reading Civic Society has made the following observations (written to the Chair of the Planning Applications Committee), as follows (reproduced in full):
 - 1.9 Summary
 1. **The developers' community engagement was** an exemplar which others should follow.
 2. We welcome development of the site. Whilst individual elements may benefit from refinement we rated the design of the overall proposal very highly.
 3. We believe on balance that it deals with the constraints imposed by the SSE equipment as well as is practical.
 4. The delivery of 209 homes in a central location, 20% being affordable is a **significant benefit. That these will on site and “tenure blind” is in line** with good practice.
 5. It seems unlikely that the Substation/ SSE equipment will be removed unless RBC is able to exercise due influence. A pragmatic approach must be taken with the vision for the clear line of sight whilst also seeking a good scheme for Reading.
 6. We understand from discussions with Berkeley Homes that the economics of the site are tight and do not give them the ability to significantly reduce the height on the Thames or remove a unit in the centre of the site.
 7. With reluctance we judged that the loss of the Locally Listed Building is acceptable given the wider benefits of the proposed development. We recommended that the key stones from the building be incorporated into the Café building.
 8. If not this then what is the alternative? If the vision continues to be **“straight line” then we have the stalemate of an irresistible force meeting an immovable object** and the site will continue to be undeveloped.
 9. The lack of a Design Guide covering the 3 neighbouring sites has not been helpful.
- 1.10 Consultation - Members of Reading Civic Society Committee have been regularly engaged by Berkeley Homes, and their Communications consultants, since November 2018 about plans for this site. We have seen, and had the opportunity to participate in, the evolution of the design. We gained some understanding of the challenges faced and the constraints of the site. Other groups we know were similarly engaged in small groups. There were at least 2 well publicised, well-staffed and well attended Public Exhibitions at suitable hours. We know that many of our members took the trouble to take part. Overall it was an exemplar of good community engagement and consultation which other developers should take on board.
- 1.11 Design and proposals for the site - Overall the Committee rated the final design very highly and felt it was one of the best we had seen for some time. We consider this to be a high-quality proposal which delivers significant housing benefits. We felt that the progressive refinements in design had sought to respond to concerns about the impact on the Thames, the concerns of neighbours and the constraints imposed by the SSE equipment remaining.

- 1.12 The Direct Link / Clear line of sight. We were given to understand in our first discussion with Berkeley Homes that they had initially believed the substation could be moved. When this was tested senior SSE management would not consider it because of cost and logistics. The aim of a direct link in the Station Area Framework and RCAAP was understandable, and supported by us. However it did not consider the practicality of the straight line on the plan being drawn directly over a significant piece of infrastructure. Unless RBC is able to convince SSE to the contrary it seems that this ambition needs to be refined and that the judgement of this planning application should be set against what is practical and achievable.
- 1.13 **We understand that PO's comment that "this** is a one-off opportunity to secure a truly high **quality link through the site to be seized".** The layout of the site means that this opportunity does not exist in the simple way set out in the Local Plan. We do not agree that the proposed route is not high quality, though discussions should continue to take all ideas and options into consideration.
- 1.14 The pedestrian and cycleway. Pedestrians and cyclists currently face an indirect and weaving route from this side of the Thames to the station. Some might say that adds to the interest. These routes will still exist post development. The proposed route through the site does mix pedestrians and cyclists. The proposed route may not deliver an unimpeded and fast route some cyclists might seek. We recall however the complaints from Cycle groups that the width of Christchurch Bridge was simply inadequate and that it would not work. If some cyclists find it impedes then then they will have the option of using existing routes and a balance of flow will be struck. Should at any time the SSE equipment be up for removal then the possibility of the more direct route would still be a possibility.
- 1.15 Removal of units - **In the conclusions of the Officer's report it is stated that "Officers believe that a different layout with fewer blocks would allow the north-south route to be provided directly and to the quality that the local plan policy allocation aspires to."** Understandably this focuses on the content of the Local Plan. Looked at in isolation the comment is probably correct. Taken to a ridiculous degree if there are no buildings on site an unimpeded route could be established. It was clear in our discussions with **Berkeley's that the balance of economics on the site** was tight. It would seem inevitable that loss of the units caused by reduced height on the Thames and removal of a block in the centre of the site would challenge the **development's viability significantly.** "**Well they would say that would they not?" True** but if the economics are tight then it is important to understand the implications of such proposals e.g. on affordable housing provision.
- 1.16 Locally Listed Building - The possibility of retaining the run of old buildings along Vastern Road, and the LLB, was explored extensively and repeatedly. We accepted that it was not practical to incorporate the old buildings on Vastern Road into a new building. With considerable reluctance we accepted that the overall benefits of the scheme outweighed the loss of the LLB 55 Vastern Road. We suggested that the key stones from the building should be incorporated into the site, ideally into the proposed café building.
- 1.17 A wider strategic view. We have been in discussion with CADRA and have seen, and support, their updated comment (email 26 March) highlighting the

importance of developing a holistic Urban Design guide and Public Realm brief covering; the SSE, Aviva and Hermes sites as this would assist the co-ordination of the planning of public realm and the potential for some coherent vision and be helpful for all 3 site owners. We recall this being raised by the communications team supporting the Berkeley Homes site during discussions in 2019.

2. Further extension of time for the determination of the application
- 2.1 The main report referenced that an extension of time for the determination of the application had previously been agreed up to 18/01/2021. This has subsequently been agreed to be further extended until 09/04/2021.
3. Clarifications within the proposals section (2) of the report
 - 3.1 The applicant has raised concerns that the images detailed within section 2 of the main report were a superseded version. The latest masterplan, ref 448.PL.SL.002 Rev E, as received 07/10/2020, is shown below and should be referenced rather than the zoomed in corresponding images in the main report.
 - 3.2 It is clarified that “The Generator” part of Block D is six, not seven (as detailed at paragraph 2.5 of the main report) storeys in height. Undercroft parking is also provided at Block D.

THE OLD
POWER
STATION
REGENERATION AREA
ILLUSTRATIVE
MASTERPLAN

Date: January 2020
448 P.S.002 E



4. Planning History

- 4.1 In addition to the history stated at paragraph 3.1 of the main report, the following additional Environmental Impact Assessment (EIA) related history is referenced:
- 4.2 Secretary of State reference PCU/EIASCR/E0345/3224129 - Request for a Screening Direction Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Proposal for: Proposed development of up to 210 dwellings with a max height of 11 storeys (up to 36m above ground level) including a new north south pedestrian link, connecting Christchurch Bridge to Vastern Road towards the station as well as drainage infrastructure and landscaping. Conclusion of Screening Direction: In exercise of the powers conferred on him by regulation 7(5) of the 2017 Regulations the Secretary of State hereby directs that the proposed development described in your client's/your request and the documents submitted with it, is not '**EIA development**' within the meaning of the 2017 Regulations. Issued 14/05/2019.
- 4.3 In short, whilst the Council issued a positive screening opinion, the applicant then sought a screening direction from the Secretary of State, who determined the emerging proposals were not EIA development (and hence no Environmental Statement was required to be submitted with the application).

5. Clarifications regarding consultation responses

- 5.1.1 Historic Buildings - In respect of paragraph 4.1.26 of the main report, it is clarified that Christchurch Bridge is already in place and the proposal seeks to connect to this.
- 5.2.1 Leisure - it is clarified that the landscaping proposals are shown in detail, rather than the reference to this being 'in outline' at paragraph 4.7.2 of the main report.
- 5.3.1 Transport - The Transport Development Control Manager has responded to various comments made by the applicant in a letter to officers received on 29th March (letter included as Appendix 2), as follows:
 - 5.3.2 The applicant has queried Paragraph 4.13.32 of the main report, stating that they do not believe the proposal requires to facilitate the turning of a delivery in the opposite direction to that identified on the tracking diagrams, already submitted, given that the 'layout provides space for vehicle manoeuvring'. However, it would need to be confirmed by the way of tracking diagrams that a vehicle serving the site would be able to undertake the manoeuvres required, given that there is a high probability that the site would be served in that way. I would reiterate paragraph 4.13.31 of the main report that the applicant has not provided any tracking for a 12m long vehicle, which the applicant has stated would serve the site.
 - 5.3.3 It should be stressed that the turning area is not just for the function of turning but is also utilised to service the site and therefore any vehicles movements must be achievable and also not result in further reversing manoeuvres over the footway / cycleway.

- 5.3.4 The Highway Authority acknowledges that a refuse vehicle would only reverse over the footway / cycleway once a week, but as has been stipulated above this is likely to be increased when general servicing requirements are included, which the applicant has assessed would equate to a total of 4 refuse/HGV movements a week. The applicant has stated that with appropriate signage, reversing alarms and multiple operatives, the risk of harm is mitigated; however, given paragraph 7.10.3 of DfT document Manual for Streets (below) the Highway Authority do not agree that this would be sufficient mitigation given that the reversing would be taking place over a busy footway / cycleway and not within a standard turning head within the carriageway.

7.10.3 Routeing for waste vehicles should be determined at the concept masterplan or scheme design stage (see paragraph 6.8.4). Wherever possible, routing should be configured so that the refuse collection can be made without the need for the vehicle having to reverse, as turning heads may be obstructed by parked vehicles and reversing refuse vehicles create a risk to other street users.

- 5.3.5 Although Paragraph 4.13.38 of the main report refers to cycle route design, this is included to provide context as to how cycle facilities should be designed. It should be stressed that the Highway Authority have considered the design for shared pedestrian and cycle routes at 4.13.41 of the main report, in which Paragraph 6.5.9 of Local Transport Note 1/20 Cycle Infrastructure Design has been referenced and states the following on shared use design:

Research shows that cyclists alter their behaviour according to the density of pedestrians - as pedestrian flows rise, cyclists tend to ride more slowly and where they become very high cyclists typically dismount. It should therefore rarely be necessary to provide physical calming features to slow cyclists down on shared use routes, but further guidance on this, and reducing conflict more generally, is given in Chapter 8, section 8.2.

- 5.3.6 The Highway Authority therefore still deem that a straight and direct shared use path through the site to the bridge should be provided in accordance with Policy and design criteria.
- 5.3.7 The applicant has stated that all design options for the route have been thoroughly explored with justification provided for the proposed route, however the assessments undertaken by the applicant have all included the retention of the residential blocks on the site, which is the reason why the proposed route does not comply with Policy requirements. As is stated at Paragraph 5.4.6 of the Local Plan (**Policy CR11g**) ‘achieving this north-south link is the main priority for the site, and this should be given substantial **weight in development management**’ and therefore the design of the route should not be compromised to facilitate additional units on the site.
- 5.3.8 It is accepted that the towpath does not currently permit cycling, but as is stated within the Paragraph 4.13.50 of the main report, **the Council’s Local Cycling and Walking Improvement Plan (LCWIP)** identifies the Towpath as being a proposed cycle route in the future and work to facilitate this has been commenced by officers. Given this it is imperative that the route to the Towpath from the site can accommodate cycling, to ensure that a comprehensive network of cycle facilities are provided.

- 5.3.9 It is accepted that there are inconsistencies with the car parking numbers and as such I have reviewed the car parking layouts for the site and these include the following:

Block D - 26 parking spaces
Block B/C - 12 parking spaces
External Area - 12 parking spaces

- 5.3.10 As such, the proposed application provides the provision of 50 car parking spaces, which includes 3 disabled spaces. This parking number and layout are deemed acceptable given the parking restrictions that surround the application site, its sustainable location and the inclusion of a condition (in the event of permission being granted) that ensures that no residents parking permits will be issued to future residents.

- 5.3.11 In relation to the provision of dropped kerbs to facilitate access to the disabled parking bays, as identified at Paragraph 4.13.87 of the main report the applicant has suggested that this could be dealt with by way of a condition. The Highway Authority have considered this acceptable.

- 5.3.12 Further to Paragraph 4.13.94 of the main report it is noted that drawing 448.PL.BC.100C was in fact superseded by 448.PL.BC.100D. This latest drawing illustrates the reorganisation of the cycle and bin stores to ensure that they are separated and this is deemed acceptable to the Highway Authority.

- 5.3.13 The applicant has stated that Paragraph 4.13.95 of the main report is incorrect in its reference to Block C providing 22 cycle spaces and it is stated that 6 spaces are proposed as per the table provided at paragraph 4.13.93 of the main report. However, drawing 448.PL.BC.100D does in fact illustrate the provision of 22 spaces. This provision exceeds that required by the Council's Parking Standards and Design SPD and therefore is deemed acceptable. Given that drawing 448.PL.BC.100D now also includes separated access between the cycle and bin stores the Highway Authority are happy that no reductions from this provision is required.

- 5.3.14 Paragraph 4.13.100 identifies that the distance to the bin store at Building EFG and B (south) is over the recommended 10m travel distance. The applicant has suggested this is incorrect following the submission of Stantec drawing 47500/5500/005A. However, although this may be the case for the bin store labelled Building B (north), which has been provided with a collection point within the recommended distance, this is not the case for the bin stores identified above and I reference the Waste Collection Strategy section of the Applicant's Transport Technical Note TN006 RBC Highway 3rd Response & Vastern Road Crossing dated 24th September 2020 which states:

The current carry distances from the bin stores to the collection points are as follows based on the refuse access strategy shown on 47500/5500/005A.

*Bin Store 1 (Building EFG) - 11m
Bin Store 2 (Building D) - 3m
Bin Store 3 (Building C) - 7m
Bin Store 4 (Building B, north) - 10m*

*Bin Store 5 (Building B, south) - 11m
Bin Store 6 (Building A) - 10m*

5.3.15 As summarised above, the distance to the bin stores at building EFG and B (south) are only 1m over the recommended distances for operatives. Given that this is only a minor and likely un-noticeable distance in reality, we do not believe it is necessary to alter the collection arrangements.

5.3.16 It should be noted that officers have checked the distances referenced within the Technical Note for the aforementioned bin stores and the distances specified are correct. It is reiterated, as per Paragraph 4.13.100 of the main report, that the Highway Authority are happy that this is deemed acceptable.

5.4.1 Natural Environment, Ecology and Landscape Services Manager responses

5.4.2 The applicant has outlined, in a letter received on 29th March 2021 (Appendix 2), various areas of the above consultee responses where inaccuracies or errors are said to have been included (sections 4T - paragraph 4.19; 4U - paragraph 4.20; and 4V - paragraph 4.21 of the main report). In particular, the applicant has stated that their “principal concern regarding the content of the report is that the consultation responses referred to in section 4 predominantly refer to superseded application material and do not take account of revised material which has been submitted to address the comments made. This is misleading and fails to acknowledge the work undertaken to resolve concerns raised during the consideration of the application.”

5.4.3 Upon investigation, officers can advise that there has been a misunderstanding of information to be included for assessment in the application between the applicant and officers. The applicant submitted a range of additional information on 14th January 2021, but followed this up with further correspondence on 19th January 2021 clarifying that “the letter we sent last week did not present any new information but was intended to help officers by setting out the latest position on the scheme. The only new information confirmed was our position on the North/South Link which you had asked for us to confirm before progressing the application further.” In the same correspondence from 19th January the applicant asked for the application to be determined in the next 3 days, as already detailed at paragraph 2.13 of the main report. On the basis of this communication officers had assumed that given the applicant had specified that no new information had been submitted (barring a north/south link position) on 14th January, this documentation should therefore not be taken into account. However, the applicant’s letter of 29th March 2021 would now suggest otherwise. The letter from the applicant on 29th March 2021 also included new information, in the form of a Land Registry title plan suggesting that the Council owns land on the southern riverbank of the River Thames, which was previously suggested not to be the case by the Landscape Services Manager (as per paragraph 4.21.3 of the main report). A number of further CGIs of the proposed development were also included, which appear to be similar to those included as part of a separate document that the applicant sent members of the Planning Applications Committee and ward members on Friday 26th March 2021.

5.4.4 Accordingly, in these unfortunate circumstances, officers ask for members to delegate authority for this specific matter to be discussed with and

assessed by internal consultees post-committee. Due to the timing of this being raised, it has not been possible for the various matters raised to be assessed by a number of different officers prior to the completion of this update report. If a verbal update is able to be provided to members at the Planning Applications Meeting, it shall be.

- 5.4.5 In essence, these matters relate substantively to the third recommended reason for refusal (as per the recommendation in the main report, as amended by the omissions detailed at the outset of this update report). It is also relevant that one of the component parts of the ‘in the absence of a s106’ reason for refusal relates to ecological mitigation, albeit this would be unchanged in any event.
 - 5.4.6 At the time of writing, it is considered unlikely that the information now to be assessed would fully address the third reason for refusal, as there remains a fundamental difference in opinion between the applicant and officers as to the methods to seek to mitigate the impact of the development on marginal habitats. The applicant is not seeking to alter the height, massing or proximity of the buildings to the river.
 - 5.4.7 It is recognised that the specific element of the recommended reason for refusal, relating to there not be sufficient space within the riverside buffer for a sustainable long-term relationship between the riverside buildings and the proposed new large canopy trees, may be addressed pending further comments from the Natural Environment Officer. This forms a component part of the recommended reason for refusal and not the sole element. The Landscape Services Manager and RBC Ecology consultant may have additional thoughts on the off-site mitigation proposed, as per the submission on 14th January 2021.
 - 5.4.8 It is clarified that should officers subsequently consider that this shall not form a reason for refusal of the application, this would not alter the overall conclusion on the application as a whole. In reapplying a critical planning balance in this scenario, the already referenced (in the main report) conflicts with the development plan would still not be outweighed by the benefits of the proposals.
 - 5.4.9 It is also relevant to note that upon receipt of the letter from the applicant on 29th March (Appendix 2), officers contacted the applicant on the same day gauging their view on the item being deferred for consideration at Planning Applications Committee on 29th March (to enable the various matters raised to be considered). The applicant replied on the same day stating they do not agree with this and do not consider a deferral to be necessary.
 - 5.5.1 CCTV - It was inadvertently stated at paragraph 4.23.1 that no response had been received from RBC CCTV team. It is clarified that a response was in-fact received, specifying that the development should have no impact on the existing CCTV system.
6. Loss of office use principle
 - 6.1 Further to paragraph 6.5 of the main report, it is clarified that the loss of the existing office floorspace at the site is accepted as per Policy EM3 and the site allocation policy. The applicant included commentary in relation to the Policy EM3 criteria, required in cases where proposals result in the loss

of employment land. Set within the context of the site allocation (primarily for residential use), the information submitted by the applicant is considered to satisfy the policy requirement.

7. Layout / scale / design / north - south route clarifications
 - 7.1 Paragraph 6.14 of the main report inadvertently references that the lowest buildings within Blocks D & E are 52m in height. The reference to 52m is incorrect, as this is a rounded up datum point height. Taking into account the proposed ground datum point of 38.6m, it is clarified that the lowest building height is 12.825m (51.425m - 38.6m), comprising the four-storey element of Block E closest to Lynmouth Court (to the west).
 - 7.2 Paragraph 6.16 of the main report specifies concern that the layout of Blocks D & C could make it difficult or the remainder of the allocated site to be developed in an acceptable way. Further to this, it is clarified that whilst there is concern in this regard, this is not to an extent whereby the proposals are being recommended to be refused on this basis. Policy CR11viii) specifically requires developments to show that they are part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of the policy (amongst other matters). In the specific regard of the development not preventing neighbouring sites, mindful that the application site is only part of the CR11g allocation, section 3.9 of the Design and Access Statement indicatively demonstrates how the remaining part of the SSE site could come forward should the opportunity arise in the future. This includes a pedestrian link between the two sites and a combination of interlocking and linear blocks to provide generous on-site open space and north-south linkages. Whilst not ideal in some ways (and this would not occur had the sub-area come forward as a single development) it is considered that the applicant has adequately demonstrated that the proposed development would not prevent the remainder of the sub-area from fulfilling the CR11 aspirations.
 - 7.3 In the applicant's letter to officers dated 29th March 2021 (Appendix 2), criticisms are raised that the Townscape and Visual Impact Assessment has not been referenced in the main report. It is clarified that the TVIA has been duly taken into account as part of the assessment of the application, despite explicit reference not being made to it within the main report. A selection of the closest viewpoints are included as Appendix 1 to this update report, with these further assisting the justified concerns regarding the height and proximity of Blocks D & E to the Thames Path and River Thames detailed in the main report.
 - 7.4 The applicant has raised criticisms that the main report fails to reference that the emerging Caversham Flood Alleviation proposals have been built-in to the scheme. In response, it is clarified by officers that no such planning application has yet been submitted for this, meaning the extent that can/should be referenced is limited.
8. Locally listed building clarification
 - 8.1 Paragraph 6.37 of the main report inadvertently details two paragraphs indented and in italics, indicating it is quoted from the Heritage Statement submitted in support of the proposals. In-fact, only the first paragraph is quoted from the Heritage Statement (section 3.2.3 of the report), with the

second paragraph being officer commentary (and therefore should not have been indented or in italics). For the purposes of clarity, it shall be referenced as paragraph 6.37a of the main report.

9. Additional energy clarification (Further to paragraphs 6.53 - 6.57 of the main report)
 - 9.1 The energy review is summarised at section 4M of the report (paragraph 4.12 at pages 84-85 of all papers). Whilst Element Energy specify some concerns regarding the acceptability of the scheme in the context of specific elements of the Sustainability SPD, such detail (choice of ASHP over GSHP for example) is not explicitly specified within Policy CC4. Furthermore, Element Energy acknowledge that purely in respect of Policy CC4 the proposals comply. Accordingly, ultimately officers consider that this should not form a reason for refusal of the application. Had the application been able to be supported by officers, then a s106 legal agreement head of term would have secured a carbon offsetting financial contribution of £228,420 in order for the development to comply in full with **the Council's Sustainability and Energy Policies**. Given the application is **recommended to be refused, this forms a further 'in the absence of s106'** based reason for refusal of the application, as further clarified below and in the recommendation above.
10. Additional S106 head of term and related clarifications
 - 10.1 In addition to the matters already detailed at paragraph 6.59 of the main report, the following is also included in light of section 9 above:
 - Carbon offsetting financial contribution of £228,420 prior to first occupation
 - 10.2 This is in line with Policies CC4 and H5, together with adopted Supplementary Planning Documents: Planning Obligations under Section 106 (2015); Sustainable Design and Construction (2019).
 - 10.3 It is also clarified that the transport mitigation measures comprise the following, as already referenced at paragraph 4.13.103 of the main report:
 - Residential Travel Plan
 - On-site car club
 - 10.4 In addition, the recommendation at the outset of this update report has also been updated to include reference to relevant adopted Supplementary Planning Documents.
11. Conclusion
 - 11.1 The conclusion specified within the main report remains unaltered in overall terms.

Case Officer: Jonathan Markwell

Appendices

Appendix 1

A selection of verified photomontages, from the Townscape and Visual Impact Assessment Addendum, as received 21/05/2020. These show the proposals in relation to the surrounding area and also take account of possible future cumulative schemes, comprising:

- **Former BMW site, King's Meadow/Napier Road (162166):** part 12 storey, part 23 storey residential.
- 29-35 Station Road (181930): 22 storey hotel, offices and retail.
- Plot E and Telecom House, Station Hill (151426): mixed uses, up to 85m AOD.
- 80 Caversham Road (182252): mixed uses, up to 123m AOD at the time of the information being submitted.
- Vastern Court Retail Park (200328).

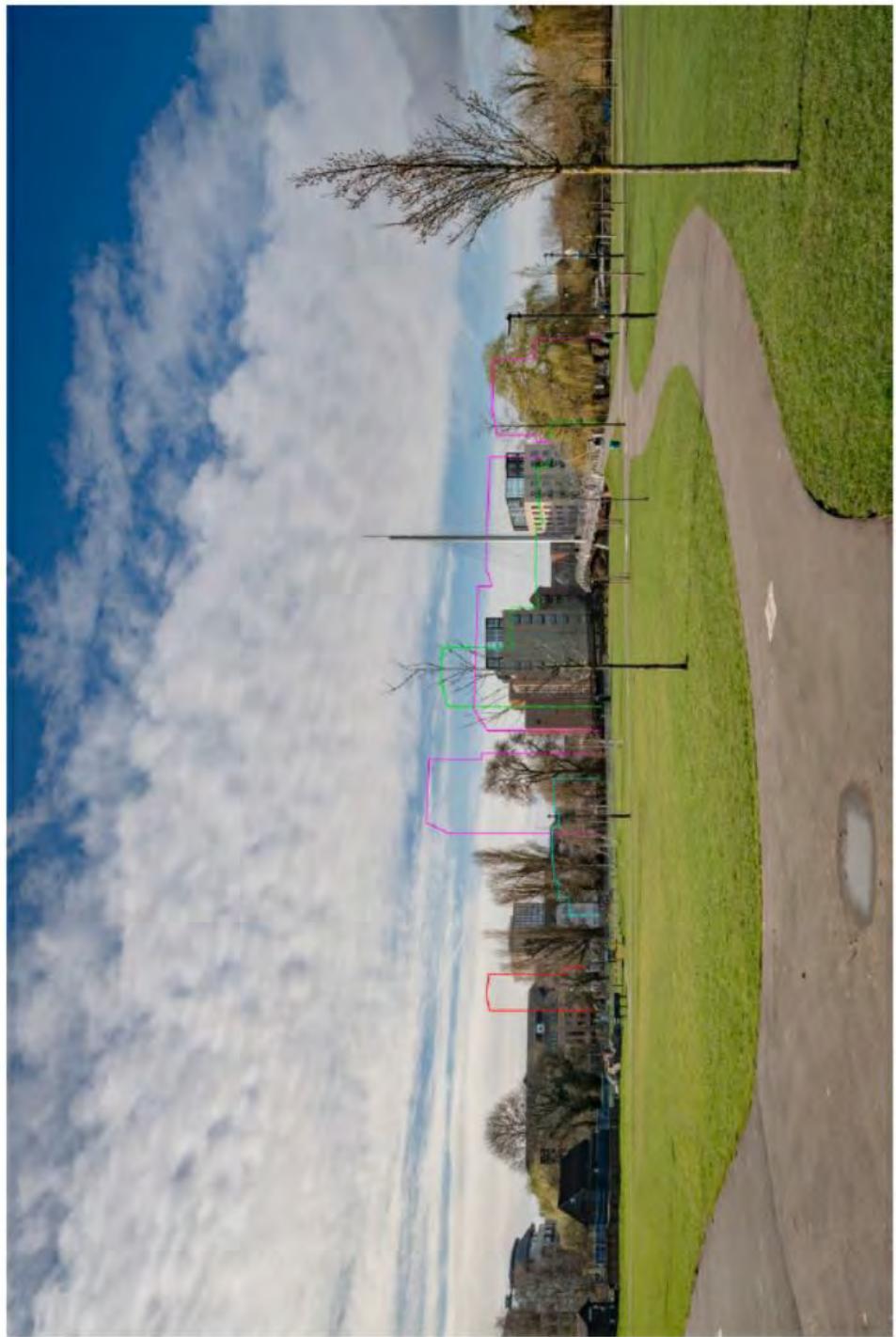
Appendix 2 - Letter from Barton Willmore dated and received 29/03/2021 '200188 Committee Report - Errors and Inaccuracies' - separately attached. Please note that, in addition to various comments above, it is assumed that the applicant's heading 'Environment Agency' on page 3 should have stated 'Natural Environment Officer'.

Appendix 3 - Written statements have been submitted by those members of the public who are registered under 'public speaking' and are included in Appendix 3.

- a) CADRA
- b) Reading Civic Society
- c) Carol Goddard
- d) Paul Goddard
- e) Paul Westcott
- f) Steve Dore
- g) Tim Moore

Appendix 1

View P2 Winter - Christchurch Meadows, approach to Christchurch Bridge, looking south-west - proposed



To achieve the optimum viewing distance of between 300-500mm (as per The Landscape Institute's guidelines), we recommend printing this image edge to edge on A2 landscape and viewing it on site from a distance of 368mm. Please refer to Section 2.7 on page 4 of Part 8 document for further information.

View P2 Winter - Christchurch Meadows, approach to Christchurch Bridge, looking south-west - proposed

40 degree horizontal field of view - cropped image



We recommend that all pages showing reduced size 'at scale' images are printed as shown in A3 landscape format. The correct 'to scale' viewing distance for all images printed in this A3 page format is 467mm.

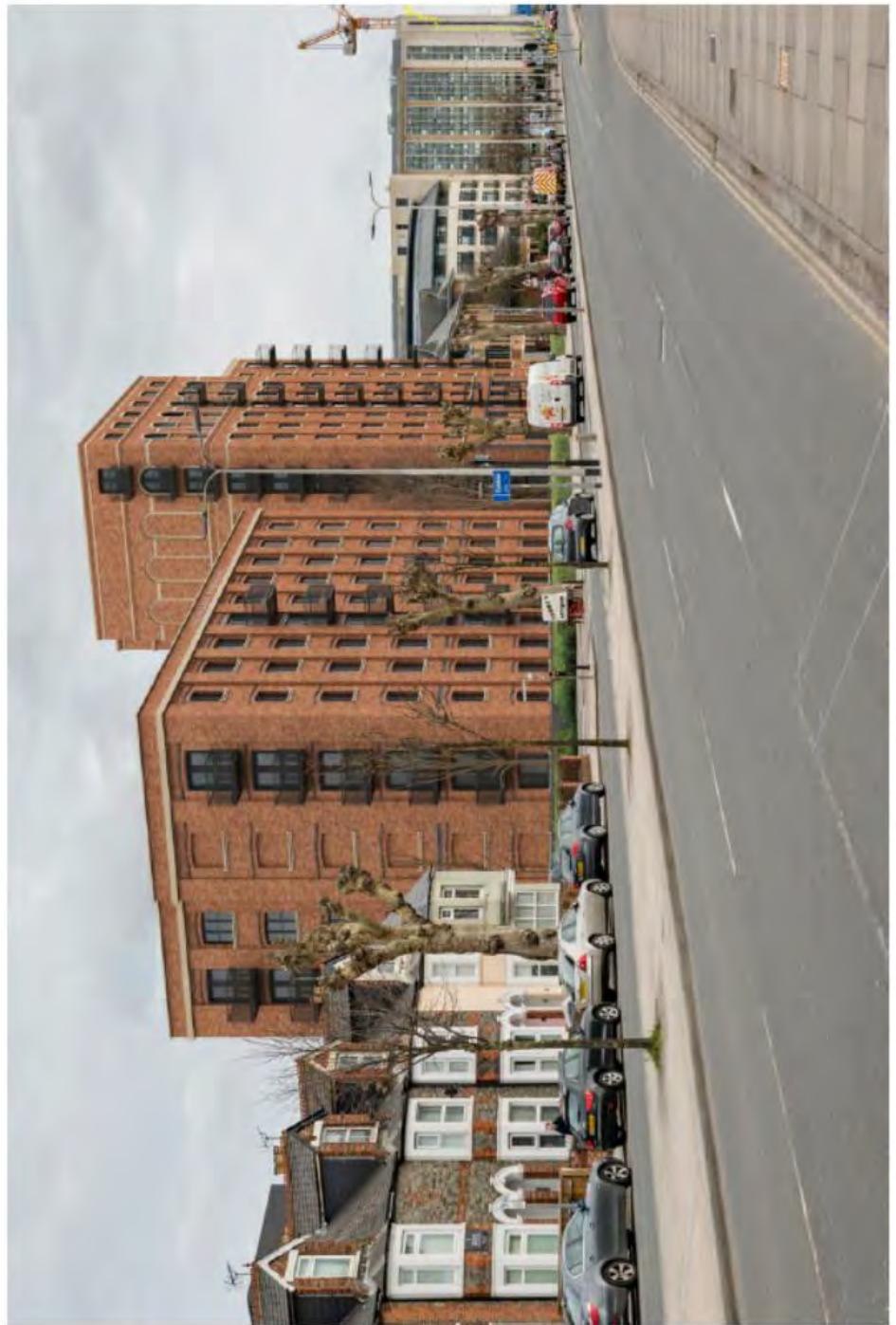
View P4 Winter - Vastern Road, looking east - proposed



To achieve the optimum viewing distance of between 300-500mm (as per The Landscape Institute's guidelines), we recommend printing this image edge to edge on A2 landscape and viewing it on site from a distance of 368mm. Please refer to section 2.7 on Page 4 of Part B document for further information.

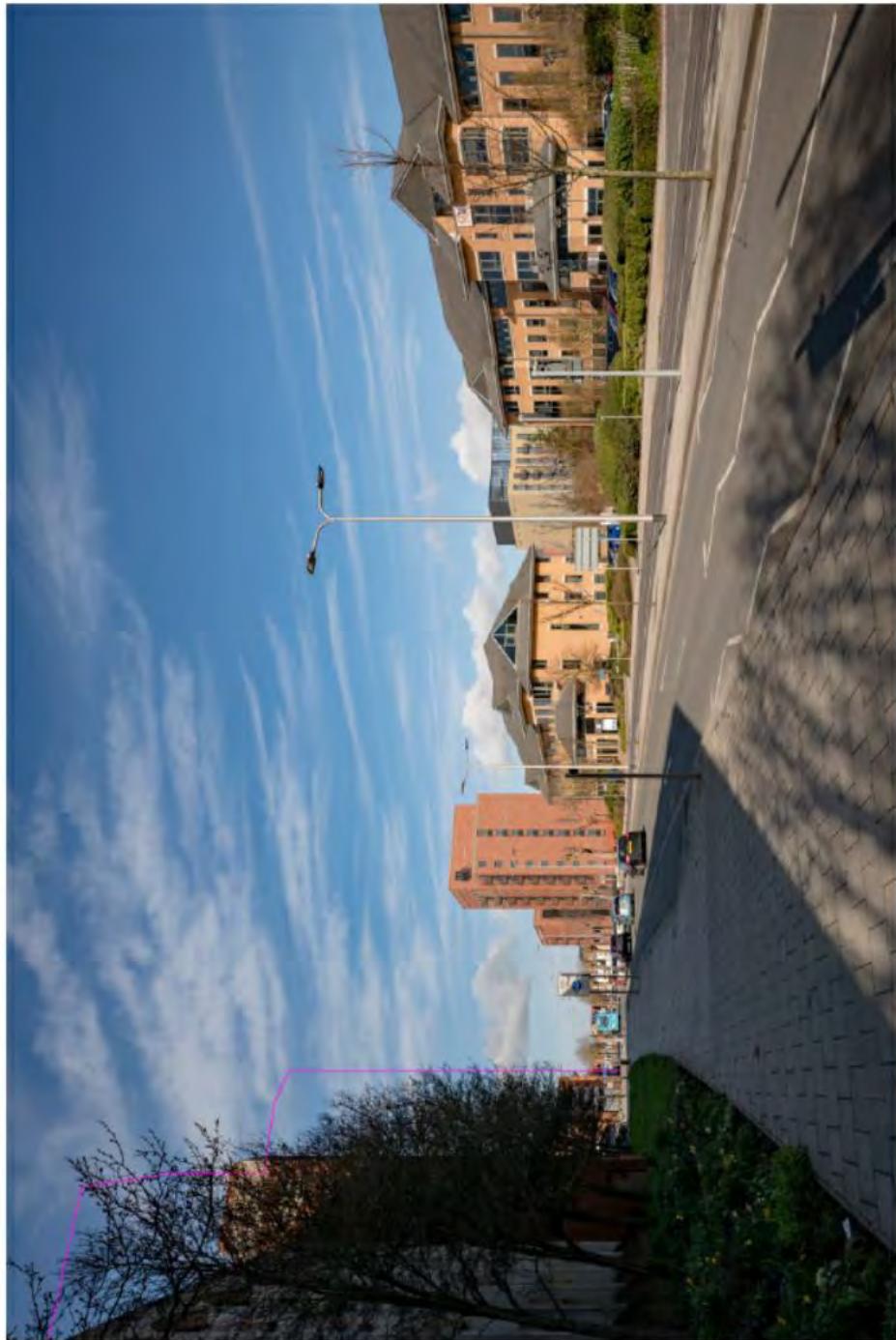
View P4 Winter - Vastern Road, looking east - proposed

40 degree horizontal field of view - cropped image



We recommend that all pages showing reduced size 'at scale' images are printed as shown in A3 landscape format. The correct 'to scale' viewing distance for all images printed in this A3 page format is 467mm.

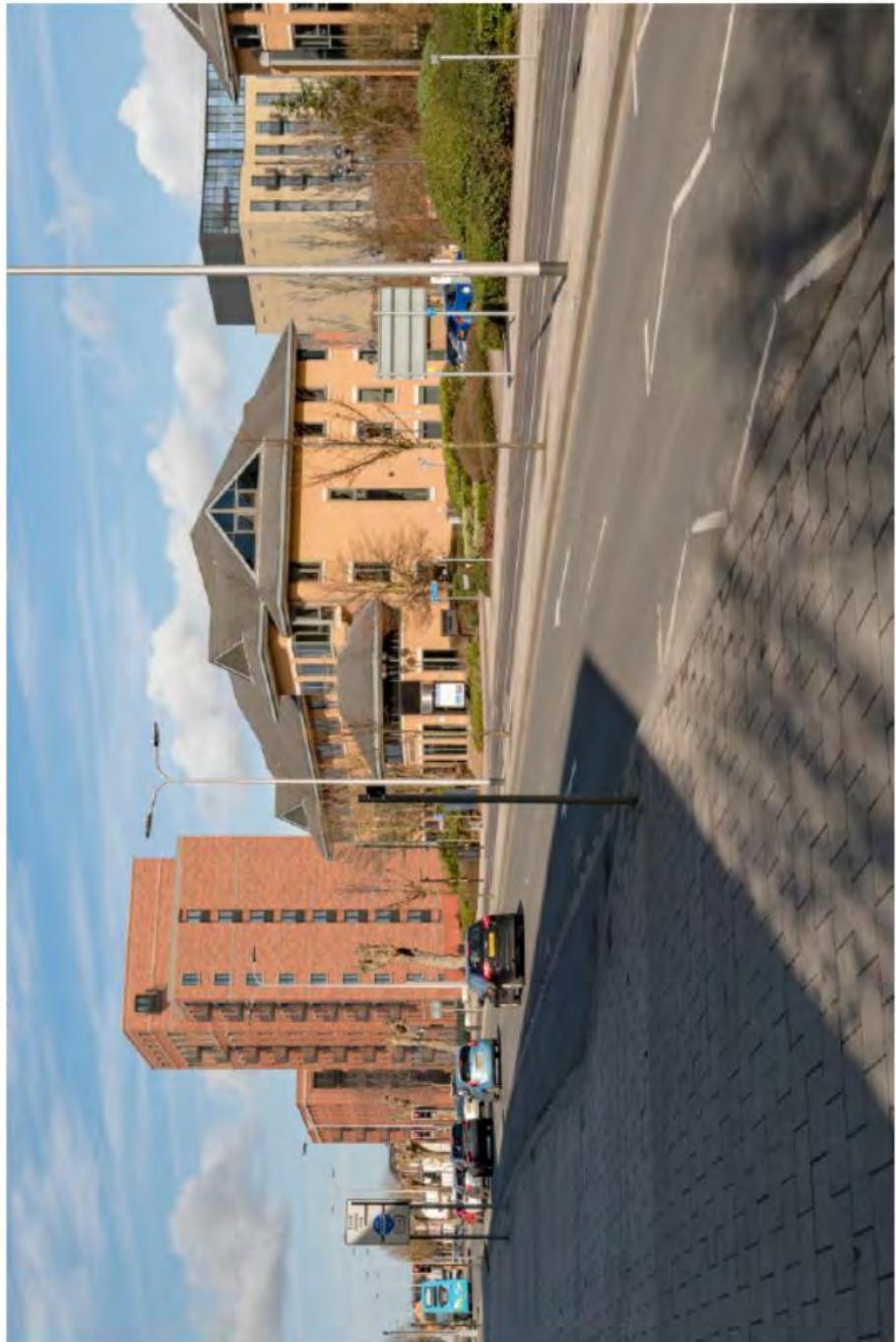
View P5 Winter - Vaster Road, looking north-west - proposed



To achieve the optimum viewing distance of between 300-500mm (as per The Landscape Institute's guidelines) we recommend printing this image edge to edge on A2 landscape and viewing it on site from a distance of 368mm. Please refer to section 2.7 on page 4 of Part B document for further information.

View P5 Winter - Vastern Road, looking north-west - proposed

40 degree horizontal Field of view - cropped image



We recommend that all pages showing reduced size 'at scale' images are printed as shown in A3 landscape format. The correct 'to scale' viewing distance for all images printed in this A3 page format is 467mm.

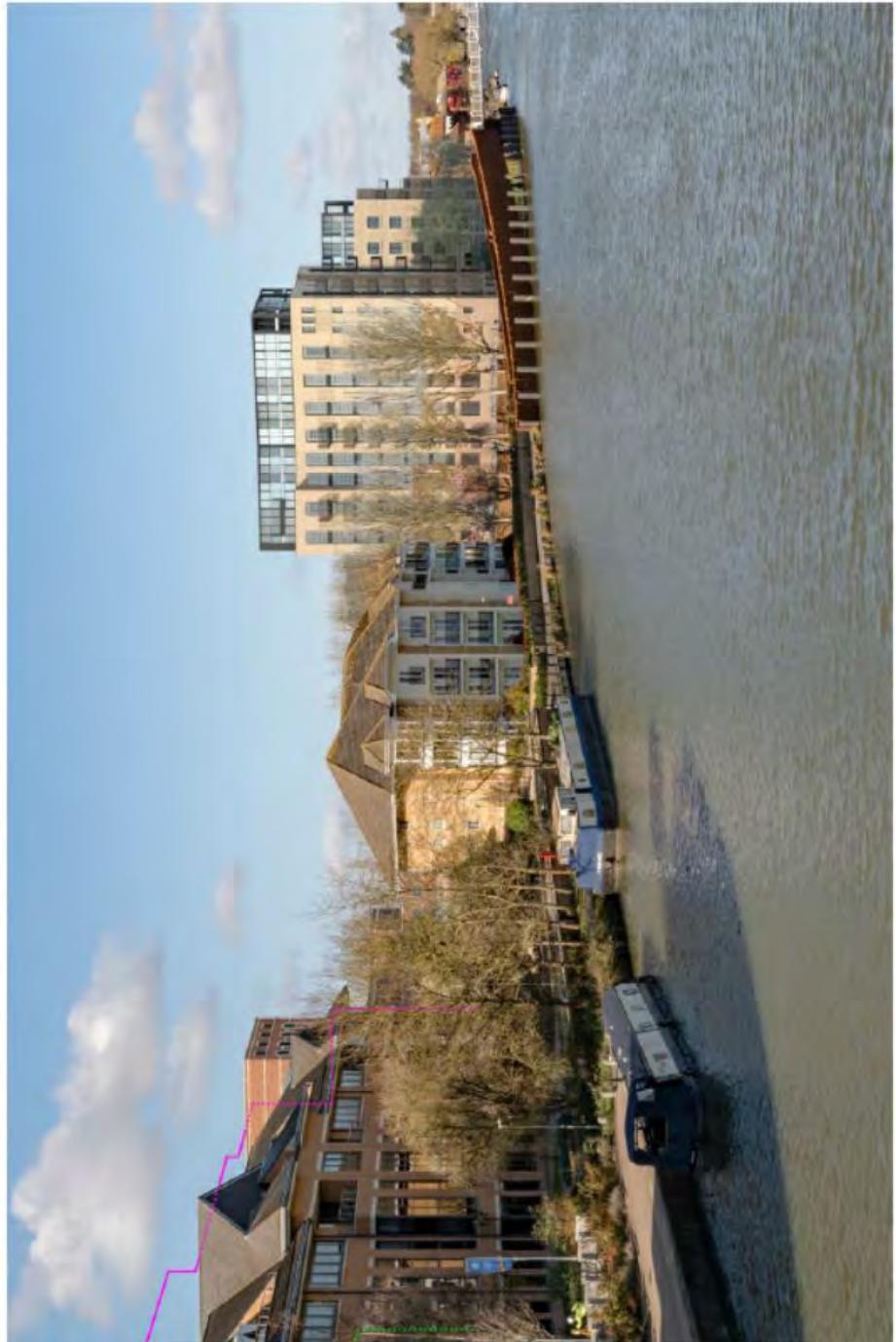
View P6 Winter - Reading Bridge, looking north-west - proposed



To achieve the optimum viewing distance of between 300-500mm (as per The Landscape Institute's guidelines), we recommend printing this image edge to edge on A2 landscape and viewing it on site from a distance of 368mm. Please refer to section 2.7 on page 4 of Part B document for further information.

View P6 Winter - Reading Bridge, looking north-west - proposed

40 degree horizontal field of view - cropped image



We recommend that all pages showing reduced size 'at scale' images are printed as shown in A3 landscape format. The correct 'to scale' viewing distance for all images printed in this A3 page format is 467mm.