

From: [Markwell, Jonathan](#)
To: [Craig Pettit](#)
Subject: 55 Vastern Rd, Reading (181724/PREAPP)
Date: 12 December 2019 17:15:56
Attachments: [181724 - 55 Vastern Rd Meeting 6.pdf](#)

Dear Mr Pettit,
Further to our recent pre-app meeting, please see attached the subsequent written advice.

Yours sincerely,

Jonathan Markwell

Principal Planning Officer

Planning Section | Directorate for Economic Growth and Neighbourhood Services

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ADVICE WITHOUT PREJUDICE

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

Dear Mr Pettit,

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 (specified as 208 residential units - 59x1, 137x2 & 12x3-bed units) with a standalone cafe & also including a new north-south pedestrian link connecting Christchurch Bridge to Vastern Rd towards Reading Station.

Pre-application meeting number: 6 (Meeting on 25/11/19)

Information considered: 'The Old Power Station, Vastern Road, Reading Pre-Application Design Booklet Pre-Application Meeting 6 November 2019', as submitted 07/11/19. At the meeting a revised version of the document was tabled, which included some additional CGI and streetscene elevation plans.

Those in attendance at the meeting: Caroline McHardy, Dave Taylor & Tom Nicholas (all Berkeley Homes); Craig Pettit (Barton Willmore); Jonathan Markwell, Darren Cook & Sarah Hanson (all Reading Borough Council).

This meeting represented pre-application meeting 6 in association with emerging proposals at part of the SSE site on Vastern Road. Since meeting 5 in October 2019 the proposals were subject to a Design South East review meeting on 20th November. The written note from the D:SE meeting was received on 5th December and, naturally, should be taken into account as your proposals evolve.

This response details the matters discussed / feedback provided at our meeting on 25th November. For ease of reference I have split this feedback up into sections, whilst noting that there are many matters which overlap. Furthermore, I have sought to keep sub-headings / ordering similar to the pre-app meeting 5 for consistency purposes.

Frances Martin
Executive Director for Economic Growth
and Neighbourhood Services

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12th December 2019

Update on the new local plan

Since the October meeting, the [new local plan](#) was formally adopted by the Council on 4 November 2019. As such, the following documents are now superseded: LDF Core Strategy (2008, Altered 2015), Reading Central Area Action Plan (2009) and Sites and the Detailed Policies (2012, Altered 2015).

North / south route & related shared space / layout matters

It is acknowledged that the latest iteration of the scheme seeks to respond to the comments made at meeting 5. Below is a summary of comments made at our meeting, together with further reflections subsequent to the meeting (e.g. following receipt of D:SE written notes).

- The pedestrian / cycle route to the bridge has been altered to improve the bends ('switch-backs') with amenity areas provided between the levels and this is acknowledged to be an improvement on the previous iteration. However, as previously stated and in accordance with the policy for the site, a direct route should be provided. This remains the strong intention of policy and, in turn, officers therefore advise in the clearest terms that you should revisit this element and seek to provide a clear, direct route from the river to Vastern Road which is step-free and does not include switch-backs. It is also noted that D:SE's first key recommendation is that a more legible gateway to the river from Vastern Road should be formed. This inherently stems back to the shape of the site, as created (in comparison with the site allocation) and the quantum of development sought. As discussed in more detail below, the removal of the 3.5 storey block could alleviate this concern. At present, put simply it is considered that the routes seek to fit around the buildings; whereas in this instance the routes should be designed first and the buildings made to fit around the routes. Should you choose to continue with the current proposal, clear and substantial justification would be required as to why this would not be provided, given that this potentially severely undermines the route from north of the station to Christchurch Bridge and conflicts with the clear Movement Principles of the RSAF.
- A dedicated accessible route is still not provided to the towpath (steps remain) and some explanation has been provided as to why this cannot be achieved. However, further justification is required before it can be confirmed that the non-provision of this facility is acceptable especially as this facility would be a requirement of the Policy. Put another way, although the inclusion of a connection from your development to the towpath is positive, it not being accessible for all people is a fundamental concern and would be difficult for officers to justify. D:SE also pick up on this point and seek for the route to be more generous and avoid steps.
- The pedestrian / cycle route through the site is to be 3m in width and this is acceptable in itself from a Transport Planning perspective (it is also generally

welcomed that this is differentiated from vehicles and is no longer a shared space, which is acknowledged to be contrary to D:SE's feelings on the approach). With regards to where the pedestrian / cycle route crosses vehicular accesses, the southern access has been designed so that it is a raised crossing to slow approaching vehicles; this is acceptable from a transport perspective. However, the northern vehicular access is not designed in this way; to ensure pedestrian / cycles are given priority, this crossing facility should be raised, in accordance with Sustrans advice.

- In relation to the spaciousness of the area in the middle part of the site, concerns remain about the footprint of the 3.5 storey block and how this continues to compromise the direct north-south route. Although this iteration has reduced the width by between 1 and 1.6m at this point, it is questioned whether this has gone far enough and it is suggested that at least a further 2m reduction should be incorporated, in order to provide a suitable north-south link - without the switchbacks which concerns continue to be raised with - which the policy demands (this would also assist in addressing the D:SE comments about making the route clearer and safer for cyclists and pedestrians). It may simply be the case, owing to the red-line boundary of the site created from your discussions with SSE, that there is no scope for built form in the narrowest part of the site and the landscaping / public open space / public art use suggested previously is more suitable at this point of the site alongside a more direct / legible north-south route.
- A turning head for a car has been identified on the plans submitted, but this does not illustrate the tracking of a refuse / delivery vehicle, as such this will need to be issued at application stage (it would have been far preferable at pre-application stage). Transport officers are therefore unable to confirm that this would be acceptable until these additional drawings are provided.
- From a transport perspective, it would also need to be clarified where any servicing will take place so as to not obstruct access to the basement car park, the turning head or the footway / cycleway.
- It has been stated that visibility for pedestrians has been suitable provided in accordance with standards. This will however need to be suitably demonstrated should an application be submitted.
- Further to the south the gap between the buildings fronting onto Vastern Road is said to have increased by 0.8m. In short, this is not considered to be a sufficient reduction in the footprint to achieve the key wayfinding link between the station and river at this point. More explicitly, it is reiterated that the width of the footprint of the four storey element needs to be substantially reduced to achieve a suitable route between the station and river which Policy CR11 requires. D:SE also reference this, stating the opening to be modest in relation to the scale of the blocks fronting Vastern Road. Therefore, officers advise that it is not considered that the steps introduced at this

time go far enough to address previous concerns raised and you should continue to explore more substantial alterations to the footprint of this block.

- The Vastern Road crossing facility should be illustrated on the submitted plans even if they are in indicative locations for now. However it is the Highway Authority's view that this should be secured through a S278 Agreement.
- From a transport perspective, the trees adjacent to the carriageway and footway should not result in conflict with vehicles and pedestrian / cyclists.

Updated Natural Environment comments

Please see below the further comments from the Natural Environment Officer (it was agreed at the meeting that a species plan would be sent through for comments, and despite this being raised in a telephone conversation with you on 29th November, this has still disappointingly not been provided to officers):

- Further tree planting has been incorporated along the north-south route through the site, which is positive in the context of the previous version of the proposals from a Natural Environment perspective. However, it remains unclear whether this goes far enough to achieve a true green link highlighted by Policy CR11g; it is suggested that further landscaping could be incorporated.
- Tree species - the trees will largely have to be relatively small in size and spread to avoid conflicts with adjacent buildings and to limit light loss into the buildings. In addition, species (particularly spread and clear stem height) will have to be carefully considered where trees are adjacent to vehicular routes to ensure no conflict with vehicles (which will include refuse and delivery).
- It is mentioned that large canopy trees have been accommodated - it is not clear where these are? These should be clearly identified at application stage.
- During the meeting, a draft species plan was discussed and officers were advised this would be provided for comment. Despite requests, this has not been forthcoming and hence the comments relating to species are principles only.
- As expected, the existence of the culvert along the frontage has meant the omission of trees shown in the previous iteration. It was confirmed that the trees shown will be in the ground with a root barrier to protect the culvert. As advised and agreed, specially constructed tree pits will be required to give the trees here and across the site sufficient rooting volume to survive and thrive, i.e. to achieve their maximum size thereby providing their maximum environmental benefits. Such details should ideally be provided at application stage to demonstrate compliance with the policy objectives.
- Physical protection (which would also need to be suitably visually attractive) would be prudent for trees adjacent to parking spaces to prevent accidental damage from vehicles.

- Trees on the riverside - the species should be of the maximum canopy size achievable whilst not creating conflict with the building and carefully positioned to avoid conflict with future residents, e.g. not directly in front of balconies
- Can potential for green roofs and walls be explored to provide further greening to help tackle climate change and air pollution? Perhaps a green wall could become a feature of the southern elevation of the two-storey building in the mid-part of the site, which will be particularly prominent in views when moving north through the site towards the river?
- SUDs - SUDs through landscaping should be explored in the first instance as the default position (as detailed by Policy EN18).
- It is noted that an AIA, AMS and lighting impact are all intended for submission with the planning application.

Massing

Whilst mindful that the summary of the D:SE advice acknowledges no major issues with height and massing, paragraph 5.1 nevertheless notes the lack of context to justify the massing. Officers continue to be of the view that insufficient information has so far been submitted to justify the height and massing proposed. The totality of the additional information submitted for meeting 6 (in comparison with meeting 5) has been broad outline street/river scenes, closer 'in colour' Vastern Road and riverside elevations (which notably only show the foreground buildings and not those behind, a single north-south elevation and some additional CGIs. This falls below the level of information submitted at meetings 1-3, and in overall terms is still insufficient to provide clear and informed advice on this matter. In particular, it continues to be considered that more detailed analysis of the proposed massing in the context of the setting/surroundings is required prior to officers being able to provide a suitably informed view on the riverside and Vastern Road frontages. It now appears that this final assessment will be left to the application stage, whereby the previously agreed viewpoints in the to-be-submitted Landscape and Visual Impact Assessment, will form the basis for the overarching future assessment in this regard.

Design approach

It is reiterated that a design approach with links back to historic uses continues to broadly be considered appropriate by officers. D:SE raise concerns at paragraph 5.3 regarding the treatment of the 'tops' of buildings, which are shared by officers. It is considered that the contrasting brick approach to terminate the Vastern Road building (as shown at meeting 5 / the latest public consultation) would appear more appropriate. Alternative options to those currently proposed on the riverside blocks should also be explored. It is respectfully considered that the 'in colour' versions of the elevations (riverside and north-south elevation in particular) perhaps do not show the lighter brick blocks in the best light (this may be owing to the lack of detailing/depth able to be shown on such plans?), so you are advised to carefully consider the level/nature of information included in your future submission. Your submission could potentially include a number of 'in focus' snapshots of particular elements

of the scheme (e.g. 1:20 details of entrances / particular brick detailing / features) to seek to highlight the design quality of the scheme.

Comprehensiveness

The provision of commentary and a plan indicating how the remaining part of the site allocation could be redeveloped in the future is welcomed in principle. However, it also raises a number of questions / concerns, most notably:

- The lack of any building on the riverside being possible as a direct consequence of windows being proposed in the eastern elevation of 'The Turbine Hall' block, which would appear to conflict with policy CR11.
- The comparatively generous amounts of open space proposed (inherently required and to arguably address a shortfall at the Berkeley Homes site).
- Whether there is sufficient space between 'The Generator' and 'The Goods Office' for an appropriate connection between the schemes to be formed (e.g. impact on the ground floor unit with 'The Goods Office' and potential conflicts increasing between pedestrians, cyclists and cars / servicing vehicles if a major route is proposed at this point).

Please revert back to the pre-app meeting 3 and 5 notes in particular for more in this regard, which remains relevant and should be fully considered in your future submission.

Level of active frontages along the north-south route

In itself, the introduction of individual front doors within the north-south route is welcomed. It continues to be noted with disappointment that none are provided along Vastern Road and this needs to be evidenced in plan format, rather than purely by commentary (to date) for it to be suitably justified. As mentioned previously, the prevailing character to the west is of active frontages onto Vastern Road. Furthermore, with the character of this area earmarked to become more residential in the future, meaning a more pleasant street environment is necessary. As such, the strong desire of officers is to include individual front doors / front amenity spaces at this part of the site and you are advised to revisit this element in full to seek to achieve this.

Access in the north-west corner of the site

Your responses in this regard appear suitable in principle and your future planning application should demonstrate these measures in practice.

Impact on Lynmouth Court and Lynmouth Road properties

The comments from meeting 5 remain unaltered and continue to apply. It is noted that a section of the 6 storey block (fronting Vastern Road) has dropped to two storeys, which would

be likely to be beneficial in relation to the final two bullet points of this section of the pre-app meeting 5 advice.

Quality of accommodation for future occupiers

Similar to the previous section, the comments made in meeting 5 under this heading remain relevant. It is however necessary to repeat the significant shortcoming in the 14.9m face-to-face distance between the single aspect 'Generator' and 'Coal Drop' buildings. Although in other areas there have been changes in the footprint of buildings, no such changes have been incorporated at this point. Your justification in this regard appears to be tree/landscaping mitigation measures. It is questioned whether trees/landscaping would be of such a height to provide suitable mitigation and, moreover, whether this is sufficient (as it would presumably require maintenance) or be appropriate (as this may impinge on the limited outlook these single aspect units would enjoy). Accordingly, it is reiterated in the strongest terms 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 minimum 20m distance. The suggested mitigation is not considered sufficient to address the concerns raised.

Heritage

Little additional details have been provided in this regard. It is noted that the latest CGIs include an arched brickwork detail in roughly the same location as the existing locally listed building on Vastern Road. The choice of location is acknowledged, but the fact that it serves a private lounge (rather than an entrance) means it is queried whether it would be more appropriate for this to be incorporated at the actual shared entrances to blocks?

Standalone café

Officers can advise of no strong preference one way or the other in terms of the D:SE suggestion for the standalone building to have a character of its own. There are considered to be benefits and drawbacks to both approaches, with justified narratives being likely to be able to be progressed in each instance by you.

Waste Services comments

These were fed into you via email on 25th November, subsequent to our meeting. In the interests of brevity, the comments are not repeated in this note. Please liaise directly with Alice Layzell prior to your future submission (including scope for a possible meeting) and copy me into any correspondence for my information. Alice will naturally be formally consulted at the time of the future application.

Residential mix and affordable housing

The residential mix has been altered to a Policy CR6 compliant level - 59x1 (28.37%), 137x2-bed (65.87%) & 12x3-bed (5.77%). This is welcomed and supported in principle. It is noted that no indication of the market / affordable tenure breakdown is provided. With this in mind, given the north of town centre location, you should be mindful of figure 4.6 at Policy H2. In short, there is an expectation for a mix of 1, 2 and 3 bed affordable units to be provided at the site, as there is evidently a need for all sizes of affordable housing units in the Borough.

Again, your submission was silent in relation to your future affordable housing intentions. At the meeting you clarified that you considered that viability could justify a 0% provision on site, but you were currently exploring options which - despite this - sought to provide an unspecified amount of affordable housing at the site. Officers would note that this marks a fundamental change in approach to the earliest pre-application meetings (with officers, councillors and at public consultation events), where Berkeley Homes' clear intention to deliver policy compliant 30% affordable housing on site was stated (albeit acknowledging that this was always caveated as being subject to the quantum of development achievable and viability testing). Obviously, Policy H3 clearly states what the Council's requirements are in this regard, while also outlining circumstances where a lower affordable housing contribution could be justified. The onus is naturally on you to provide such justification, which would be subject to review (& subject to a separate fee in addition to the application fee, as outlined [here](#)). It is also advised that your submission must include commentary explaining the reasons why, on the surface, it appears that affordable housing has significantly fallen from the initially suggested levels (for the benefit of members and members of the public, as well as officers).

Crime Prevention Design Advisor comments

These were fed into you via email on 25th November, subsequent to our meeting. In the interests of brevity, the comments are not repeated in this note. Please liaise directly with Anne Chalmers prior to your future submission and copy me into any correspondence for my information. Anne will naturally be formally consulted at the time of the future application.

RBC Ecology comments

The RBC Ecologist has made further initial comments (subsequent to our meeting), following consideration of the information submitted for this meeting. In general terms, it is commented that in comparison with the previous iterations, the current proposals appear better in principle in terms of reducing the number of windows facing onto the river (although the increased amount of glazing on the upper most two floors may be of particular concern). Your submission clarifies that "Lighting impact will be considered in relation to ecology as part of the application." As such, no substantial further comments are able to be made at this stage, over and above previous advice. As a reminder, it is advised that the

future lighting assessment would need to assess the existing light levels (as the baseline) and how these will change after development. It will also need to be informed by bat surveys of the river corridor.

Energy and sustainability

Your submissions have been virtually silent in terms of your emerging energy and sustainability strategies for the site. As you are aware, RBC has declared a Climate Emergency, and set out its commitment to working to achieve a carbon neutral Reading by 2030. The Local Plan responds to the Climate Emergency by setting out ambitious but achievable standards for sustainable design and construction (in particular Policies CC2, CC3, CC4, CC5, EN18 and H5). It is vital that residential and non-residential schemes are built in a way that minimises their use of energy and harmful emissions, reducing and mitigating other environment impacts. Naturally you will need to demonstrate how you will comply with the relevant policies in the Local Plan, through both an Energy Statement and a Sustainability Statement (which should include confirmation of carbon off-setting approach that will be taken and, if necessary, a calculation of S106 payment amount required should the development fail to achieve 100% off-set on-site).

The residential component of the scheme is required to be Zero Carbon (or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and planning contribution to offset remaining carbon emissions to zero). At application stage the following is required: provision of appropriate evidence to provide confidence to the LPA that policy requirements can be achieved, typically through a projected SAP report.

The new non-residential elements of your proposals will need to meet BREEAM 'Very Good'. At application stage the following is required: a pre-assessment estimator incorporating a 5% buffer and provision of other appropriate information to provide confidence to the LPA that policy requirements can be achieved.

In addition to the adopted policies, a new SPD is scheduled to be adopted shortly (consultation on the draft version took place earlier in the year) and will replace the 2011 SPD. This goes into detail as to the level and nature of information required at application stage. With specific regard to decentralised energy and district heating (as per Policy CC4), the draft SPD identifies the site within one of four clusters potentially suitable for heat network schemes. Accordingly, this should be factored in, together with partnership working with other sites emerging to the south of your site at this time. In addition, the potential to use the adjacent River Thames as a source of hydropower (as per appendix 2 of the draft SPD) should also be considered.

Accuracy of the CGIs

You are reminded that the proposed CGIs should all be fully accurate and, in particular, should not include elements which are not actually proposed. For example, on the River Thames CGI, a range of ecological improvements appear to be shown along the riverbank - similar to the improvements introduced when Christchurch Bridge was built - it is questioned whether this is proposed / within your ownership? This could potentially be misleading for members of the public considering / commenting on the proposals.

Advertisement consent?

It is noted that a number of buildings appear to include high level lettering/signage. Your future submission should make clear whether this is shown indicatively (and would be subject to a separate future advertisement consent application - if this is the case, this should be annotated on the relevant plans), is part of the proposals (with advertisement consent duly sought as part of your application - should advertisement consent be required for such signs) or whether you consider that advertisement consent is not required for the signage (which obviously depends on the size / location / illumination of the signs). As such, your future submission should be clear as to your approach in this regard.

Concluding comments

Although some further positive steps have been incorporated within the latest proposals, the overwhelming feeling is that these do not yet go far enough to address previous concerns and, moreover, a number of potentially fundamental issues remain or are unresolved. For example, it is disappointing that virtually no discussions regarding affordable housing have been undertaken, despite this being a key objective of any proposal of this nature and this often being a matter which slows the determination of applications (when long-running discussions regarding financial viability often ensue). Hence, despite significant pre-application discussions (which are naturally welcomed), it would appear that many in-principle matters will not be agreed prior to your imminent submission. Naturally, officers will seek to continue to work positively and proactively with you to resolve issues and hopefully be in a position to advance a mutually suitable scheme at the site. However, at the present time there are a number of significant issues to resolve prior to officers possibly being able to support the proposals.

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

Yours sincerely

Jonathan Markwell (via email only)

Jonathan Markwell - Principal Planning Officer *JM*