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BY EMAIL: alison.dyson@planninginspectorate.gov.uk

28876/A3/EF/KC

4th August, 2021

Dear Alison,

NATIONAL PLANNING POLICY FRAMEWORK
APPEAL REFERENCE APP/E0345/W/21/3276463 – 55 VASTERN ROAD, READING

We write on behalf of the Appellant, Berkeley Homes (Oxford & Chiltern) Ltd, in response to your email dated 21st July 2021 inviting us to submit comments on the relevance of the revised National Planning Policy Framework (NPPF), published on 20th July 2021, to the above appeal. This letter does not seek to reiterate the case we have set out in our submitted Statement of Case but comments on the relevance of specific sections within the revised NPPF to this appeal.

Overall, for the reasons set out below, we consider that the revised NPPF strengthens our position that the appeal should be allowed and planning permission granted. Our detailed comments are set out below.

Delivering a sufficient supply of homes

The revised NPPF maintains emphasis on the Government's objective of significant boosting the supply of homes. The appeal proposal would contribute to the achievement of this objective and is therefore consistent with the NPPF.

Promoting healthy and safe communities

The revised NPPF includes references to 'attractive' and 'well-designed' pedestrian and cycle routes. For example, Paragraph 92 of the revised NPPF states:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts**



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- that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;**
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and**
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.** (new text underlined)

The submitted Statement of Case addresses how the appeal proposal will create attractive and well-designed routes for both pedestrians and cyclists. The design philosophy for the site has been heavily influenced by the provision of attractive and well-designed routes for all users, including a well-lit pedestrian and cycle north-south route which is overlooked on both sites and has good visibility.

Taking account of the above, the references to attractive and well-designed routes support our case that the proposed north-south route through the site (and the proposals for pedestrians and cyclists more generally) should be supported and that the appeal should be allowed.

Promoting sustainable transport

Paragraph 106 also refers to 'attractive' and 'well-designed' routes, stating:

Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;**
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;**
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;**
- d) provide for ~~high quality~~ attractive and well-designed walking and cycling networks ~~and~~ with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);**
- e) provide for any large scale transport facilities that need to be located in the area⁴⁴, and the infrastructure and wider development required to support their operation, expansion and**

contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy⁴⁵. (new text underlined, deleted text struck through)**

As we set out above, the appeal proposal includes attractive and well-designed facilities for both pedestrians and cyclists. In this regard, the appeal proposal is consistent with and supported by the revised NPPF.

Moreover, the submitted Statement of Case demonstrates that alternative routes through the site would result in a development which is less accessible, less attractive and less well-designed. Therefore, the revised NPPF supports the development of the site as proposed by the Appellant.

Secure cycle storage is proposed as part of the appeal scheme, as referred to in the original Statement of Case (Appendix 14, paragraph 4.2). The appeal proposal is therefore consistent with the NPPF in this regard.

Paragraph 110 includes an additional criterion for assessing development proposals in respect of sustainable transport, stating that:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) safe and suitable access to the site can be achieved for all users;**
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ⁴⁶; and**
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. (new text underlined)**

The submitted Statement of Case refers to the National Design Guide and demonstrates the compliance of the appeal proposal with the National Design Guide and other relevant standards and guidelines.

Overall, the revised NPPF supports our case that the appeal should be allowed, as the development is consistent with national guidance.

Achieving well-designed places

Paragraph 126 refers to 'beautiful and sustainable' buildings, stating:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process. (new text underlined)

The visual attractiveness of the appeal proposal is discussed in detail in the submitted Statement of Case, with the Statement of Case demonstrating that the proposal is consistent with, and supported by, the revised NPPF.

In townscape and visual terms, 'beautiful' here means not only the visual interest and appeal of the built forms and landscape design, but also consideration of, and contribution to, locally distinctive character. The proposals fully respond to local character.

With regard to sustainability, the appeal proposals have been designed using a fabric first approach and include a centralised energy strategy. To this end, the appeal proposals are consistent with, and supported by, the revised NPPF.

The revised NPPF includes a new paragraph specifically referring to trees. Paragraph 131 states:

Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵⁰, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

The appeal proposal includes a key north-south route within the site which will be tree-lined. Trees are also incorporated elsewhere in the appeal proposal, including the retention of existing trees along Vastern Road and new tree planting along the edge of the River Thames, providing substantial gain in terms of the quantity and character of vegetation within the site. Long-term maintenance of this planting can readily be secured by an appropriately-worded condition. The appeal proposal balances provision of significant canopy-level vegetation with the need to avoid future conflict between trees and buildings. In this regard, the appeal proposal is in line with the revised NPPF.

In accordance with paragraph 134 of the revised NPPF the proposal reflects local design policies and guidance as well as national guidance, and is a design which is outstanding and innovative, promoting high levels of sustainability and helping to raise the standard of design in the area.

In conclusion, appeal scheme and the Statement of Case as submitted as part of this appeal responds positively to the NPPF including the recent (July 2021) revisions. Indeed, for the reasons set out above there are aspects of the revised NPPF which provide further support to the case that the appeal proposal should be approved.

We trust that the above provides the Inspector with sufficient detail at this stage regarding the implications of the revised NPPF for this appeal. The Planning Proof of Evidence will address in detail the revised NPPF, with further detail being provided by other individual proofs as appropriate, demonstrating why the revised NPPF provides further support for the appeal proposal.

Please contact me by emailing emily.ford@bartonwillmore.co.uk should you require any further information or if you have any queries.

Yours sincerely,



EMILY FORD
Senior Planner