COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL ITEM NO.
PLANNING APPLICATIONS COMMITTEE: 15th FEBRUARY 2022

Ward: Abbey
Application No.: 200328/OUT
Address: Vastern Court, Caversham Road, Reading
Proposals: Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. A demolition phase and phased redevelopment (each phase being an independent act of development) comprising a flexible mix of the following uses: Residential (Class C3 and including PRS); Offices (Use Class B1(a); development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), D1 and D2 (community and leisure); car parking; provision of new plant and renewable energy equipment; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure; engineering operations.
Extended Target Date: 31/7/2021

An appeal against the non-determination of this application has been submitted to the Planning Inspectorate. The Inspectorate has confirmed that the appeal will be determined by way of an Inquiry. The Council is required to submit its Statement of Case by 18th February 2022.

Whilst this Council is no longer able to decide this application it is necessary for Members to confirm the case that this Council will present to the Planning Inspector. This report sets out all the relevant planning policies and relevant material planning considerations and invites Members to confirm the decision they would have made if they had been able to determine the planning application. This will then become the Council's case in respect of the forthcoming appeal.

RECOMMENDATIONS:

Recommendation

The Planning Applications Committee confirm that had they been able to determine the planning application they would have resolved to **REFUSE Outline** planning Permission for the following reasons:

1. *Scale, height and massing*

   The Applicant has failed to demonstrate how proposed plot heights in excess of Local Plan and RSAF height and massing guidance will not result in unacceptable detrimental effects on the townscape, the surrounding area and the setting of public spaces, especially when considered in the context of cumulative effects with adjoining allocated, emerging and existing sites contrary to NPPF Section 12., the National Design Guide. Reading Borough Local Plan Policies (2019) Policies CR2, CR3, CC7, H2, CR10 and CR10(a), CR11 and CR11e, the Reading Station Area Framework (2010).

2. *Tall buildings*

The siting, height and likely massing of proposed Tall Buildings within Plots A, B, C and D are bulky, harmful to the setting and the character of the surrounding area and public spaces and fails to achieve the high standard of design expected of a Tall Building. This is contrary to contrary to NPPF Section 12, Reading Borough Local Plan Policies (2019) EN1, EN3, EN5, CR2, CC7, CR10, H2, CR11, The Reading Tall Buildings Strategy and the Reading Station Area Framework (2010).

3. *Views and townscape*

The proposed siting, maximum heights, and likely massing of tall buildings within Plots C and D will appear bulky and over-dominant resulting in a detrimental impact on the skyline and harm to short and medium distance views including along Station Road, the setting of Station Square (North and South) and surrounding buildings and structures.

Therefore, the development is contrary to NPPF Section 12, Reading Borough Local Plan Policies (2019) Policies CC7, H2, EN1, EN3, EN5, EN6, CR2, CR3, CR10 and CR10e, CR11 and Section 12 and 16 of the NPPF, The Reading Tall Buildings Strategy, and the Reading Station Area Framework (2010).

4. *North-South Link*

The development as proposed fails to demonstrate that satisfactory direct alignment and high-quality design and form of the north-south link can be provided in accordance with policy and guidance. Therefore, the development is contrary to NPPF section 12, The National Design Guide, Reading Borough Local Plan Policies (2019) CC2, CC7, CR2, CR3, CR11, CR11e, CR11g, TR3 and TR4 and the Reading Station Area Framework (2010).

5. *Heritage*

By virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station, the Market Place/London Street Conservation Area and the Grade II* Town Council Chamber. The public benefits of the proposals are not considered to outweigh the less than substantial harm caused to the significance of these designated heritage assets. Therefore, the development is contrary to Reading Borough Local Plan (2019) Policies EN1, EN3, EN5, EN6 and Section 16 of the NPPF.

6. *Public Realm*

The proposed siting of development plots, the public realm and vehicular access arrangements at the interface of the Development with Vastern Road, Caversham Road, and the remainder of the CR11e Allocated Site Station, (including integration with the North Station Square, fail to maximise and secure high quality public realm, make the most efficient use of the site, achieve effective permeability, and fail to adopt a comprehensive approach to the development of the Allocated Site. Therefore, the development is contrary to NPPF Section 12, Reading Borough Local Plan (2019) Policies, CC7, CR2, CR3 CR11 and CR11e, TR3, TR4 and the Reading Station Area Framework (2010).

7. *Daylight/Sunlight (Existing and future residents)*

The proposed development would result in unacceptable loss of daylight to existing residents at 17-51 Caversham Road, and has not demonstrated whether acceptable living conditions (daylight and sunlight) could be achieved for occupants in the new development. In addition, it has not been adequately demonstrated how an acceptable level and quality of private and communal amenity space could be achieved for all future occupiers, whilst meeting appropriate levels of daylight and sunlight penetration. The proposal submission does not also include an assessment of the cumulative impact on the adjoining RMG site and the loss of daylight sunlight to the SSE site. Therefore, the development would be contrary to NPPF, The National Design Guide, Reading Borough Local Plan Policies (2019) CC7, CC8, H10.

8. *Wind*

It has not been demonstrated that the proposed development would result in an acceptable wind and microclimate environment, such that the mitigation measures as set out in the ES would not be sufficient to provide the required level of mitigation. This would create a harmful and unpleasant environment for users of the site. Therefore, the development would be contrary to NPPF, The National Design Guide, Reading Borough Local Plan Policies (2019) CC7, CC8, CR2, CR10.

9. *Landscape, trees and green network*

The proposed layout, scale and quantum of development fails to demonstrate the satisfactory delivery of required landscaping principles, appropriate protection and retention of protected trees, and consolidation, extension and/or enhancement of the 'Green Network'. Therefore, the development is contrary to NPPF 2021, The National Model Design Code (July 2021), Policies EN12, EN14, EN15, EN18, CR3, CC7 of the Reading Borough Local Plan (2019), the Council's Sustainable Design and Construction SPD (2019), Reading Station Area Framework (2010) and the adopted Tree Strategy.

10. *Failure to provide appropriate public open spaces*

The proposed development fails to provide appropriate, well-designed public spaces of a flexible size and shape due to the location and alignment of development plots related to the Station Square North and the area of open space at the western end of the east-west link, and as a result fails to demonstrate that it is part of a comprehensive approach to its sub-area which contributes towards the provision of policy requirements for open space that benefit the whole area, contrary to policies CR2 b, CR3 ii, CR11 viii of the Reading Borough Local Plan (2019) and the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010).

11. *Sustainability*

The application fails to demonstrate a sufficiently robust strategy in terms of minimising carbon dioxide emissions, meeting the predicted residential and commercial energy targets and selection of most appropriate on-site renewable energy technologies, contrary to policies H5, CR10, CC2, CC3, CC4 of the Reading Borough Local Plan (2019) and the Council's adopted SPD, Sustainable Design and Construction (2019).

12. *Failure to secure S106*

In the absence of a completed legal agreement to secure an acceptable contribution or mitigation plan, towards the provision of:

(i) Employment, skills and training for the construction and end user phases of the development;
(ii) Affordable Housing (reliant upon independent viability feedback)
(iii) Off-site open space, leisure and recreation facilities
(iv) Transport including: footpath/cycle way enhancements on Vastern Road and Caversham Road, signalised crossing, underpass, car club, parking permits, travel plan.
(v) Highway works – S278/38
(vi) Carbon offsetting
(vii) Public realm
(vii) Build to rent controls

Contrary to Reading Borough Local Plan (2019) Policies CC9, EN9, CR2, CR3, H3, H4, H5, TR1, TR3, TR5, Employment Skills and Training SPD (2013, Affordable Housing SPD (2021), Reading Borough Supplementary Planning Document Planning Obligations under Section 106 (2015).

The Planning Applications Committee confirm that they give delegated authority to the Assistant Director of Planning, Transport and Regulatory Services to make changes to add or to to remove the above reasons for refusal.

1. Introduction

Background

1.1 This planning application was originally submitted on 26th February 2020 with substantial amendments submitted on 8th October 2021. These amendments included a reduction in overall maximum floorspace from 115,000 sqm to 90,850 sqm, removal of land use flexibility in 3 of the 4 proposed development plots, removal of proposed hotel use, and amended illustrative masterplans. The revised submission comprised of the following documents:

- Amended description;
- Revised ownership certificate;
- Revised Development Parameters Schedule and Plans;
- Submission of a new phasing plan;
- Revised Townscape and Visual Impact Assessment (TVIA) within the ESv
- Revised Design & Access Statement;
- Revised Design Code;
- Revised Economic Benefits Statement;
- Revised Transport Assessment;
- Revised Interim Travel Plan;
- Environmental Statement Compliance Letter for the revisions;
- Environmental Statement Revised Heritage Chapter and Appendix 2.1a Heritage Statement.

1.2 The LPA undertook a full re-consultation along with publicity (site notices and newspaper) in order to allow consultees and interested parties the opportunity to view and comment on the revised application.

1.3 The Council received an appeal for non-determination for the above application on the 23rd December 2021. The appeal is scheduled to take place via Public Inquiry on 26th April 2022. A statement, giving full details of what the Council's case will cover at the inquiry, is required to be submitted by the 18th February 2022.

1.4 Notwithstanding the lodged appeal, it was always the intention that such a major strategic allocated site within the town centre would be brought to committee for determination.

1.5 Whilst the Council are no longer in the position to make a binding decision on the application, there remains the need as part of the Council's Statement of Case for the lodged appeal to confirm the decision that the Council would have made.

1.6 As reported, the timetable for preparing the Council's initial Statement of Case is by the 18th February 2022 with the assumption that the Council's case has been agreed by Members of the relevant determining authority, in our case Planning Applications Committee.

1.7 As mentioned above, the Council has been reconsulting on a substantial number of revised plans and information and officers can confirm that some responses are still awaited. This is reflected in the following report, However, if matters change to a material extent officers will notify the committee, the appellants, and, the Planning Inspectorate as soon as practicable.

The site and its context

1.8 The application site measures 1.77 ha and is part of an allocated site in the Reading Borough Local Plan 2019 (Site CR11E – North of Station) for redevelopment for mixed use consisting of residential, office and retail/leisure uses. The site is located immediately to the north of Reading Railway Station and approximately 200m south of the River Thames.

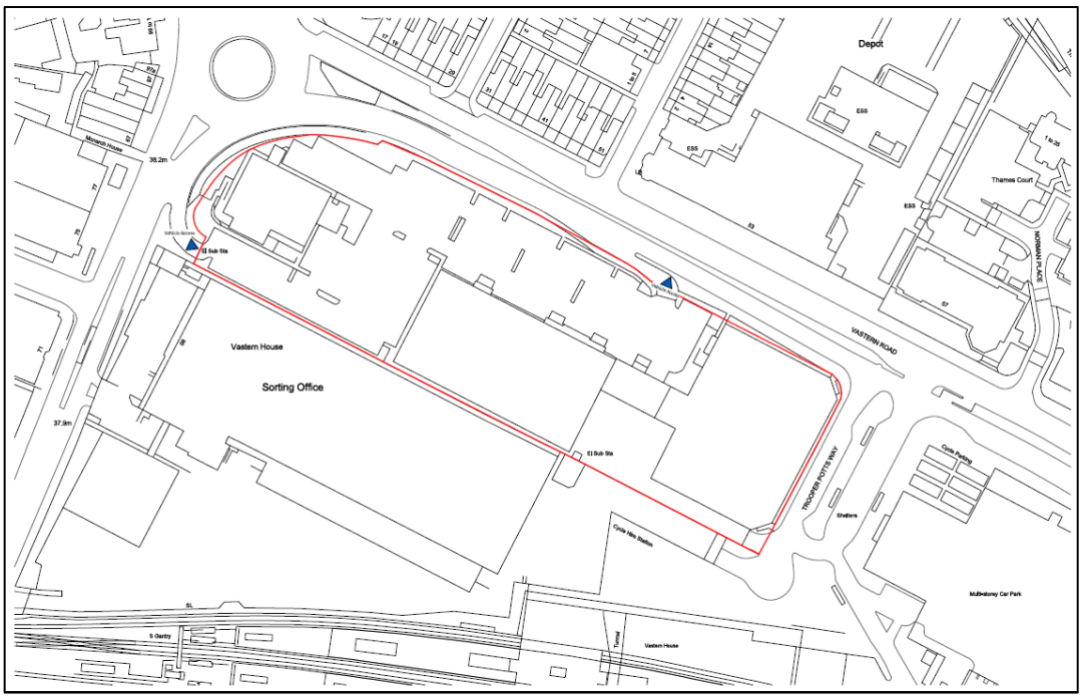


Figure 1: Extract from submitted location plan.

1.9 The site is bounded to the north by Vastern Road (A329) which forms the northern element of the town's Inner Distribution Road (IDR), beyond which there are residential properties and an office building, owned by Scottish and Southern Energy (SSE). To the east the site is bounded by Trooper Potts Way, beyond which is Reading Railway Station multi storey car park owned by Network Rail. To the south of the site is the former Royal Mail sorting office and the North Station entrance, beyond which lies the Western Railway line. The application site is bounded to the west by Caversham Road, beyond which lie a range of commercial, residential and industrial properties.

1.10 The application site is occupied by a series of retail units, consisting of Aldi, The Range, Majestic Wine Warehouse and a separate building to the northwest of the site occupied by TGI Fridays. A large proportion of the site is given over to surface level car parking (280 space) and service yards associated with these retail units. The retail units are low rise, approximately 2-3 storeys high, and of uninspiring 1980s/90s utilitarian appearance.

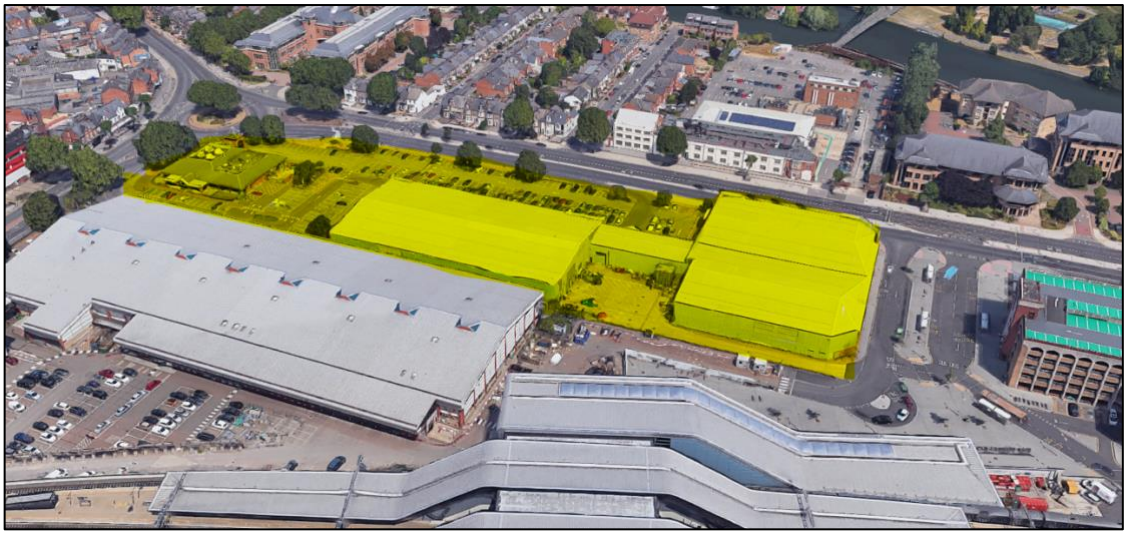


Figure 2 – Application site highlighted - Looking North (Google Aerial imagery 2022)

1.11 The site contains no heritage assets, however, the following Grade II listed structures surround the site: the former station ticket office (the Three Guineas pub, recently refurbished); the statue of Edward VII on the Station Approach roundabout; and Great Western House on Station Road (the Malmaison hotel/restaurant). The site is not within or adjacent to a conservation area, the nearest being the Market Place/London Street Conservation Area, to the south-east beyond the railway line. To the north across Vastern Road, is the SSE site. The entrance building is designated (as of 22/05/2017) on the RBC List of Locally Important Buildings, and is therefore a non-designated heritage asset.

1.12 The topography of the site is broadly level, with a slight slope to the perimeter of the car park bordering Vastern Road. The site lies within Flood Zone 2.

1.13 As described, the site is covered by development plan policies including a specific site allocation policy in the Local Plan 2019. This is expanded upon in Supplementary Planning documents including the 'Reading Station Area Framework' (2010), which the 2019 Plan confirms remains extant. These will be covered in further detail in a later section of this report.

1.14 In addition to the site allocation and local listing described above, there are also a number of other site constraints / designations / nearby designations:

- Within the Office Core
- Within the Central Core
- Within an Air Quality Management Area (AQMA)
- Within a smoke control zone
- Potentially includes contaminated land
- The nearby River Thames, Christchurch Meadows, Kings Meadows and Hills Meadow are major landscape features
- Christchurch Meadows, Kings Meadows and Hills Meadow are important areas of open space
- Within the North of the Station cluster identified in the Sustainable Design and Construction SPD as being potentially suitable for heat network schemes.
- Tree Preservation Order 3/06 which protects 7 individual trees

2. Proposal

2.1 This outline planning application seeks to enable the redevelopment of the application site. The application seeks permission for the following description of development:

> *Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. A demolition phase and phased redevelopment (each phase being an independent act of development) comprising a flexible mix of the following uses: Residential (Class C3 and including PRS); Offices (Use Class B1(a); development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), D1 and D2 (community and leisure); car parking; provision of new plant and renewable energy equipment; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure; engineering operations.*

2.2 The proposed development would comprise:

- Demolition of the existing buildings on the application site;
- Below ground excavation necessary for below ground surface water attenuation;
- Construction of up to four new buildings, up to approximately 112.9 meters above ordnance datum (m AOD);

2.3 Delivery of a total maximum floorspace of up to 90,850sqm gross external area (GEA), which could include:

- A minimum of 600 to a maximum of 1,000 new residential units within a floorspace range up to 80,000sqm GEA, provided within a range of apartment buildings of varying scale and a mix of unit sizes, including a proportion of affordable homes;
- Between 2,000sqm GEA and 7,000sqm GEA of flexible retail, leisure and community uses (Use Class A1-A5, D1-D2);
- A maximum floorspace of 24,500sqm GEA office use (Use Class B1a);
- Delivery of up to 50 car parking spaces for blue badge and car club spaces;
- Delivery of cycle storage in line with current policy requirements;
- Delivery of a mix of public and private open space, including children's play space, equivalent to a minimum of 10% of the application site area.

2.4 Given the degree of flexibility being sought at this outline stage, the proposed development could come forward in a range of different ways at the detailed design stage. These include:

- A residential-led scheme delivering up to 80,000sqm GEA of C3 land use, with the remaining comprising one or more of B1a, A1-A5, D1-D2 uses (no less than then minimum of each proposed).
- A mixed-use scheme delivering up to 24,500sqm of B1a, up to 48,000sqm of C3, and the remaining comprising one or more of A1-A5, D1-D2 uses (no less than then minimum of each proposed).

2.5 Fig 3 below outlines the minimum and maximum floorspace by Use Class which could be brought forward in order to achieve the overall maximum GEA of 90,850sqm.

Use Class		**Plot A**	**Plot B**	**Plot C**	**Plot D**	**Total GEA**
C3 Residential Units	Minimum	48,000				**48,000**
	Maximum	16,400	19,750	23,200	20,650	**80,000**
B1a Offices	Minimum	0	0	0	0	**0**
	Maximum	0	0	0	24,500	**24,500**
A1-A5, D1-D2	Minimum	2,000				**2,000**
	Maximum	7,000	7,000	7,000	7,000	**7,000**

Figure 3: Minimum and Maximum Floorspace by land use and plot

2.6 As described, this application is submitted in outline with all matters reserved. Permission is essentially sought for a 'flexible' mixed use scheme. The amount of development is not considered a reserved matter and is, therefore, proposed to be fixed within the maximum and minimum level proposed across the site. If outline planning permission were granted, then that would be the planning permission and there is the reasonable expectation that any Reserved Matters approval would subsequently be granted for buildings that reflected the range of development proposed. It would not be possible for the LPA to 'row back' from an agreed range of development granted at outline stage. It is therefore essential that the LPA is satisfied that the maximum physical expression of the amount of development sought at outline stage could result in an acceptable form of development, based on local plan policy and with due regard to any other material planning considerations.

2.7 The application is accompanied by a Planning Application Booklet which contains a set of Parameter Plans. The application is also accompanied by a Design Code document which, if acceptable alongside the Parameter Plans, could be secured by condition in order to set clear limits on the development and demonstrate that an appropriate level of design quality would be achieved.

2.8 Whilst all matters (*details of access, appearance, landscaping, layout and scale*) are reserved to be considered at a latter stage, the submitted Parameters Plans and Design Code seek to provide clarity on whether the Council's design aspirations for the site could be achieved within the parameters provided. The Design Code provides guiding principles on standards for external space, appearance, use of materials and the quality of the development. This is applied through an illustrative proposal within the accompanying Design and Access Statement showing how an acceptable form of development could be brought forward.

<u>Community Infrastructure Levy (CIL)</u>

2.9 The development would be liable for CIL. The Council's CIL Charging Schedule sets a base rates per square metre for different uses. The rate is index linked from the date of adoption of Schedule in and the current rates for 2022 include:

- £156.24 per square metre (Gross Internal Area - GIA) for residential and sheltered accommodation
- £39.06 per square metre (GIA) for office accommodation in the Central Core (which includes the application site).
- Care homes (nursing care and fully catered), retail and other development have a zero charge.

2.10 The above rates apply to permissions granted within the year 2022 and are subject to change for permissions approved after 31/12/2022.

2.11 The liability for this site would also be subject to any relevant allowances for existing GIA that meets the CIL *'in lawful use'* test, which could allow an offset for existing GIA. The resultant liability may also be reduced should the developer apply for mandatory Social Housing CIL relief allowed within the CIL regulations.

3. Relevant Planning History

3.1 The most relevant planning history in relation to the application site is detailed below:

Application no.	Proposal	Decision
87/TP/1105	Development to include retail warehouse and restaurant, together with car parking, landscaping & int. service area	Approved 6/4/1988
03/01175/TELE	Telecommunications installation – 12.5m high slim street works monopole (including antennae) and equipment cabinet	Refused 13/11/2003
05/01120/FUL	Amendments to parking layout and elevational alterations	Approved 29/11/2005
06/00317/FUL	Installation of louvres to SW elevation, mezzanine floor, trolley shelter	Approved 17/5/2006
06/00669/FUL	Alterations to external canopies and amendments to parking layout	Approved 8/8/2006
07/00052/FUL	Alterations to Unit 4 comprising the widening of 2 existing fire escape doors and the opening up of 2 more	Approved 13/3/2007
07/01140/FUL	Minor external alterations to shopfront, erection of canopy to front of building, minor external alterations to south-east elevation and siting of secure compound in rear service yard	Approved 30/10/2007
07/01395/FUL	Removal of condition 7 of planning permission 87/TP/1105 to allow unrestricted delivery hours	Approved 20/12/2007

In addition to the relevant planning history, several sites adjoin the application site within the Station/River Major Opportunity Area (Local Plan policy CR11) and Sub Area E (North of Station (CR11e) and these are:

- Royal Mail Group Site ('RMG site') to the south of the Application Site.
- Northern Station Entrance and the North Station Square to the south of the Application Site.
- Northern Station Area Bus Interchange and Network Rail Car Park to the east of the Application Site.
- The Southern Electric Site ('The SSE site') - Station/River Opportunity Area Sub Area G (CR11g). Proposed redevelopment of the western half of the Sub Area - '55 Vastern Road' is the subject of an Appeal.

4. Consultations

RBC Internal Consultees Full details of each response received are available on the public application file.	
RBC Transport Team	Revised submission: No objection on technical highway safety grounds subject to conditions and S106 provisions. However, concern is raised over the desirability and design implication of certain aspects of the scheme e.g. independent access parallel to the proposed access on the adjoining site. [Officer Note: These comments raised over desirability and design implication are considered in detail within the design section of this report]
RBC Historic Buildings Consultant	Revised submission: In the case of the Main Building of Reading General Station and the Market Place/High Street Conservation Area the proposals will create a degree of less than substantial harm (moderate and low respectively) to their significance. Such harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
RBC Planning Policy Team	Object for the following reasons: • The alignment of the north-south link when considered alongside adjacent sites will not allow a direct route containing visual links between the station and River Thames; • There should be stronger parameters around which frontages need to be enlivened by ground floor active commercial uses; • The potential lack of any office development on the site could prevent the achievement of a high-quality mixed-use destination; and • The proposed residential mix lacks justification.
RBC Urban Design Consultant	Revised submission: Four areas of concern have been highlighted in relation to design matters. These are: • Layout, routes, and integration - the North-south link • Scale, height, and massing. • Townscape/Views. • Public Realm.

	Layout, routes, and integration The development as proposed may prevent the achievement of the high-quality north-south pedestrian and cycle link as a result of a failure to provide a satisfactory alignment for the connection through the site such as that this compromises the route. Scale, height, and massing. The proposed heights of the development contradict RSAF guidance, and the three-fold approach to density, height and mass set out in the RSAF has not been followed. The combined effect of the proposed height, density and mass of the proposed scheme is unacceptable. The reasons for any exceptions to this policy approach have not been fully justified, whilst the Illustrative Scheme (DAS Chapter 6) raises significant concerns that the development in accordance with the Framework and Design Code will result in harm. Townscape/Views The proposal is considered to harm to views along Station Road towards the Station Square and its Clock tower which are considered high-quality view of strategic importance to the town's image. The proposals would detract from Reading's skyline by crowding views of the Station Clock Tower with detrimental impacts upon the existing public realm. The bulky and overly dominant massing will leave few visible gaps between buildings and fail to offer a sympathetic composition of tall buildings gathered around views of the Station and clock tower. Finally, the upper storeys will are considered to be bulky with no setbacks or modelling of the building silhouette (and few controls offered in the Design Code to limit this). Public realm In term of public realm, the parameter Plans, DAS and Design Code, contain little or no guidance on how the Development will help frame, protect, and enhance the setting of the Square and the start of the North-South Route. With regard to the east/west spine road, no such mechanism has been agreed to avoid the creation of two parallel east/west service roads. This would result in a vast area given over to vehicle circulation that will act as a barrier to pedestrians crossing from one side of the street

	to the other and a general dominance of vehicle movements over pedestrians. The Parameter Plans, to be approved at the outline stage, set the edges of development plots close to the existing back of pavement prevent the creation of a tree-lined avenue along Vastern Road. The proposals do not allow sufficient planting margins to enable tree-planting of sufficient scale to frame views along the very-wide avenue and soften the harsh dual carriageway environment. The location and form of the area of the proposed public realm in the western part of the site does not conform either with Local Plan Fig 5.3 Station River major Opportunity Area Strategy (showing a diagonal street in yellow extending from Caversham Road towards the Station marked in the key 'activation of key routes and spaces with town centre uses') or the RSAF Fig 8.2- Framework Structure. The proposed public space will not mark the gateway of the meeting of the east-west spine road with Caversham Road.
RBC Access Officer	Original submission: • Highlights the fact shared spaces are not a popular feature for many disabled people, especially in relation to shared surfaces with cyclists. • Water features, planters, public art etc are welcomed, but they must be sited appropriately. • Support the provision of Blue Badge car parking spaces. • Highlights the need for accessible dwellings • It is hoped that the podium garden(s) would be accessible to all residents. • Need for access buttons to be easily reachable by all, especially those using wheelchairs and people of shorter stature. • Consideration of the need for disabled people to carry refuse bin storage areas. Revised submission: • Urge the developer to consider ground floor units for accessible dwellings. • Need to accommodate pass doors into the development not solely revolving doors. • Glazing will need manifestation at ground level. • Highlight need for wheelchair users to have easy access to balconies, and will they be of a height such that they can be seen through. • Need to consider the accessibility of roof gardens for those with impaired mobility.

	[Officer Note: Relevant Part M requires can and would be secured via condition. Remaining matters can be considered at a reserved matters stage when the final composition of the development is known, and detailed design submitted. At this stage and based on the submitted parameters, there is not considered to be any requirement which cannot be considered and met at that stage]
Berkshire Archaeology	Original submission: The 'Historic Environment Assessment' (Technical Appendix 2.5) concludes that the site has limited archaeological potential. The assessment also concludes that the site has a low potential for prehistoric remains. The assessment recommends an archaeological watching brief during development, following the monitoring of geotechnical works. Berkshire Archaeology are in agreement that no further assessment through field survey is required at this stage and that a programme of archaeological work can be secured by an appropriately worded condition should the proposal be permitted. Revised submission: No further comments.
RBC Leisure and open space	Revised submission: Concern raised over inadequate provision of on-site open space. Off-site contribution required.
RBC LLFA	No objection. The drainage strategy is deemed acceptable in principle subject conditions securing sustainable drainage (to be approved) and sustainable drainage (as specified).
RBC Infrastructure CIL officer	No objection. The liability for this site would also be subject to any relevant allowances for existing GIA that meets the CIL 'in lawful use' test, which could allow an offset for existing GIA. The resultant liability may also be reduced should the developer apply for mandatory Social Housing CIL relief allowed within the CIL regulations.
RBC Valuations (BPS)	Revised submission: To be reported in an Update Report

RBC Housing Team	No comments received.
RBC Natural Environment Team	Revised submission: Through inconsistent submissions, lack of commitment to landscaping principles and lack of detailed layout, the proposal fails to demonstrate appropriate retention and protection of protected trees and fails to demonstrate how landscape principles can meet with current policy and adopted document requirements, and as such is contrary to local and national policy.
RBC Ecology Consultant	Revised submission: Object as the scheme fails to demonstrate the satisfactory delivery of required consolidation, extension and/or enhancement of the 'Green Network'.
RBC Landscape Services	No comments received.
RBC Environmental Protection Team	No objection subject to conditions.
RBC CCTV / Community Safety	No comments received.
RBC Education	No comments received.
RBC Waste Services	No comments received.
RBC Licensing	No comments received.
RBC Building Control	No comments received.
RBC Sustainability Team	No comments received. [Officer Note: The Energy Manager's views on the energy and sustainability aspects of the development have been sought and are discussed in the Sustainability section below]

External Consultees	
Statutory	
Environment Agency	Original comments received 14 May 2020

	In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused. To overcome our objection, the applicant should submit additional information which addresses the points highlighted above, specifically: •How will the volumetric compensation be installed and what volume is being compensated. •Are there any alternative locations to provide compensation avoiding the egress and access routes? [Officer Note: Technical Note submitted by the applicant to respond to EA matters, as part of the amended submission. Awaiting further comments from EA at the time of writing]
RB Fire and Rescue	No objection subject to adherence with building regulations and fire safety standards.
Historic England	Original comments received 21st April 2020: The proposed development is likely only to have impacts on designated heritage (listed buildings, conservation areas) through the development being seen in important views, including the channelled view looking north along Station Road towards the listed Station building. The visibility of Blocks C and D in views looking north along Station Road have not been sufficiently explored and the impact of them on the Station building is not clear. A rectified view looking north should be provided. Therefore, there are concerns regarding the application on heritage grounds and meeting the requirements of Para 189 of the NPPF and statutory duty under S66 (1) of the Planning (Listed Buildings and Conservation Areas) Act1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. [Officer Note: New view looking north were provided and reconsulted upon as part of this revised application, however no further comments from HE were received]
Health and Safety Executive	[Officer Note: From the 1st August 2021 minimum requirements around fire safety were introduced which needs to be addressed when LPAs are determining

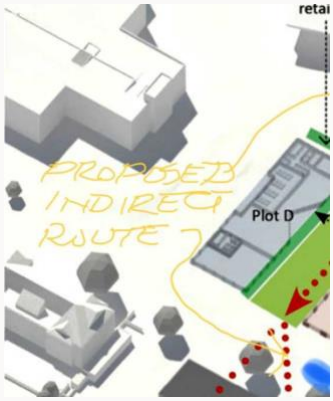
	planning applications and will require input from those with the relevant expertise. This requirement contains Two key elements: 1. Establishes the H&S Exec as a statutory consultee for 'relevant planning applications'; 2. Require the developer to submit a fire statement setting out fire safety considerations specific to the development for 'relevant buildings'. As this application is for outline consent, these requirements are not applicable and therefore no response is required from those with relevant expertise]
Thames Water	No objection to surface water arrangements (dealt with on site). Request conditions requiring the submission of details of foul water drainage; details of water network upgrades required to accommodate the additional flows to serve the development. Informatives: Do not permit the building over or construction within 3m of water mains without prior notification'; and as the proposed development is located within 15m of Thames Water's underground water assets an informative is recommended.
Non- Statutory	
Emergency Planning	No comments received.
Clinical Commissioning Group (CCG)	No comments received.
Reading UK CIC	No comments received.
Southern Gas Networks	No comments received.
SSE	No comments received.
Crime Prevention Design Advisor (CPDA)	No objection subject to suitable community safety/ crime prevention design. Recommend that as detailed plans come forward that conditions are used to ensure the development achieves the physical security standards and principles of Secure By Design.
Sport England	The site is not considered to form part of or constitute a playing field. No objection but advise that although there is not requirement to identify where CIL monies will be directed Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport.

Crossrail TFL	Land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction. No comment on the proposals.
Natural England	No objections to original or amended schemes.
Airspace safeguarding	No comment.
BRE – wind/microclimate	The level and nature of information submitted in the Technical Appendix is not considered to be sufficient or robust. At some locations the predicted wind safety conditions are not credible. Some clarification and additional information is required, in particular with reference to how the seasonal target wind conditions were assessed when only annual data are presented. The wind microclimate assessment predicts that there will be several areas around the proposed scheme where the wind conditions will be either uncomfortable or unsafe. Such conditions would be unacceptable. Mitigation measures are suggested, which could be conditioned and implemented at the detail design stage. We agree that the efficacy of these measures should be established via a wind tunnel assessment.
BRE – daylight and sunlight	Loss of daylight to some windows and rooms at 87-97 Caversham Road would be outside the BRE guidelines, though the retained levels would be only just outside the recommended values. This would count as a minor adverse impact. Loss of daylight to 17–49 Caversham Road would be outside the BRE guidelines. This is classified as a major adverse impact to numbers 21-49 as all the windows at the front of the houses would be affected including main living rooms, and the loss of light is well outside the guidelines. For numbers 17 and 19 the loss of daylight is assessed as a moderate impact. The cumulative assessment has not considered loss of daylight to the Hermes[RMG]/Reading Metropolitan scheme, or the loss of daylight and sunlight to the SSE site across Vastern Road. These should have been addressed in the Environmental Statement. A large number of living rooms in the proposed development are predicted to have limited daylight. With the RMG scheme in place, 79 (44%) of these 177

	living rooms would not meet the minimum recommendation for daylight provision. For bedrooms, compliance rates are better with just 14 not meeting the recommended 1%. Sunlight provision in these rooms on the lower floors would be poor, with just 21 (12% of 180) living rooms and studios analysed meeting the BRE/BS sunlight recommendations with the RMG scheme in place. With the existing surroundings, the environmental statement indicates that sunlight in the open spaces between Blocks A and B and between Blocks C and D would meet the recommendation while the space between Blocks B and C would not. A cumulative assessment of these spaces with the RMG scheme in place should have been included in the Environmental Statement. [Officer Note: Officers sought clarification from BRE as to whether the conclusions would support refusing the planning application. It was confirmed that the applicant has not demonstrated how they could improve daylight provision to the proposed development at the reserved matters stage so that nearly all rooms complied with the ADF recommendations. The applicants have therefore not demonstrated whether acceptable living conditions (daylight and sunlight) could be achieved in the new development.]
Caversham and District Residents Association (CADRA)	Further to CADRA's letter of 14 November 2019 to Richard Eatough, attaching our letter to Aviva commenting on their pre planning proposals, we are writing now with our comments on the outline application 200328 recently submitted by Aviva. Whilst there are some changes from the pre application that ameliorate the proposals, broadly speaking our previous comments remain valid. Our letter to Richard Eatough also made observations on the need for the Hermes, Aviva and Berkeley sites to be considered together as a whole by RBC in respect of their density, heights, massing, green space principles and the route from the station to the river. THE BIG PICTURE AND SITE USE

	CADRA accept the concept of a new, largely residential quarter between the station and the River Thames. We have no objection to the mix of uses incorporating residential, offices, a hotel, and retail to serve a new residential community. This needs to be of appropriate density and heights with a clear and well landscaped pedestrian and cycle route from the station through to the new Christchurch Bridge and with the provision of proper ancillary facilities and greenspace. The proposals for all three sites; Hermes, Aviva and Berkeley involve a high density of residential development where none exists at present. With regard to the Aviva site, the number of residential apartments appears indeterminate on the application, although a schedule in the Design and Access statement indicates 562 flats. This appears to be a welcome reduction on the 600 to 900 flats proposed at pre application stage. Nevertheless, the figure of 562 flats when added to the 650 residential flats proposed on the Adjacent Hermes/Royal Mail depot site, application no 182252, gives a total of 1,212 apartments. We note that Site CR11e in the new Local Plan, which covers the Aviva and Hermes sites combined, has an indicative allocation of 640 to 900 dwellings. The total proposed by these two developers of 1,212 apartments is therefore substantially in excess of the upper range in the Local Plan and goes a great way to explaining the unsatisfactory nature of the proposals. We hope that RBC will apply the new Local Plan policies with rigour. ALIGNMENT AND LEGIBILITY OF THE NEW PEDESTRIAN AND CYCLE ROUTE FROM THE STATION TO THE RIVER, INCLUDING THE VIEW FROM THE STATION CONCOURSE The Reading Station Area framework and the Reading Central Area action plan allowed for a direct link both visually and in landscape terms through to the river from the station. Due to the need to retain SSE equipment, only part of the SSE site has come forward for development. Berkeley have thus moved the pedestrian and cycle route west from the route intended, whereas Aviva on their site have not matched or coordinated with this alignment. There is thus now an indirect route to the river and a dog leg along the way. In addition the possibility of taking advantage of the View from the new fully glazed first floor station concourse towards the river has been lost. Plot C of the Aviva application now squarely blocks this View. This is a failure of urban design. We attach below a photograph showing the

current outlook from the glazed station concourse, which indicates the potential of designing to take advantage of this View. We also 2 enclose a marked up extract from the Applicants Design and Access statement illustrating the indirectness of the route proposed. There has not been liaison between developers on the alignment of the route. Plots D and C should be re configured to investigate providing a direct route. The future View from the glazed Station Concourse (requested from the Applicant but not forthcoming) should be a fundamental part of the design of both the Aviva and Berkeley sites. Coordination of detailed design between developers along the route such as tree species, hard surfacing, street furniture etc would also be beneficial. [illegible] coordinated with this beneficial.



HEIGHTS AND MASSING

The proposals are not in accordance with the spirit of RBC Tall buildings policy. This allows for a cluster of the tallest buildings to the south/ town centre side of the Railway line. Heights then reduce northwards towards the river and RBC have an elegant diagram with a curved line setting this out visually. Heights on the taller southern edge of the Aviva scheme do not coordinate with those on the Hermes site and in many cases rise in height from the Hermes site rather than reduce. On the northern edge of the site, where heights should be substantially reduced, 8 to10 storeys are proposed. The proposals should be reduced in height to better reflect policy and to be in proper scale with the buildings of the existing residential communities to the north and west of the site where they adjoin them. DENSITY AND GREEN SPACE Related to the points on heights and massing above, the proposed density of development, green space and distances between buildings and blocks will lead to unsatisfactory living conditions. There has been

	some movement from the pre App stage where the applicant was proposing dimensions of 15 metres, window to window, between residential blocks and buildings 6 to 8 storeys high! 20 metres separation is now proposed, this remains unsatisfactory given the proposed heights. The width within the courtyards, window to window, of the multi storey residential blocks (including single aspect flats) appears still to be less than 20 metres. With regard to green space, the 'podium garden' spaces within the courtyards of the residential blocks are at first floor level. Any planting will be on a concrete deck and limited. This and the narrow dimensions of these areas, highlighted above, indicates that these areas are likely to be relatively hard areas with limited natural sunlight and limited planting and cannot be considered as contributing effective or satisfactory amenity space. TRANSPORT AND PARKING CADRA do not believe that sufficient thought has been given at this Outline Application stage to the principles of transport and parking on this scheme and the needs of the possible circa 562 flats proposed, some of whom will be families with children. Parking for adequate car sharing spaces, visitors, multiple and frequent deliveries and the disabled needs proper consideration. Advocating the use of public car parks such as the station car park is unrealistic. Transport also needs to be considered in relation to school catchments. ARCHITECTURAL DESIGN QUALITY Whilst this is an outline application, the choice of materials is unimaginative. The illustrative overall block views using these materials illustrate a blandness and mediocrity that do not bode well for any future detailed architectural treatment of the scheme. FOOD RETAILER While discount retailing is a recent development and may not be considered a Planning issue, the potential loss of the Aldi store on the site does need to be raised and 3 properly considered and this has not been addressed. The Aldi store offers low cost food and household goods to the current communities in the area, many of whom may be on modest incomes. In this respect it has an important function. In addition, the overall proposals for the area

	postulate an increase in population of several thousand people. Food shopping within walking distance for this new car free community needs to be considered and planned for. This application is an exercise in establishing value for the Applicant. The design is fundamentally flawed in respect of density, satisfactory urban living standards, and many urban design principles. It holds no benefits for Reading and requires a radical rethink and redesign in coordination with the related adjoining sites.
Network Rail	Network Rail has no objection in principle, however, before seeking detailed planning consent the applicant should consider the risk of solar glare affecting train drivers' view of signals when they approach the station from both ends. Standard advice is provided to the developer on fencing, drainage, demolition, lighting, site layout (all buildings be situated at least 2 metres from the boundary fence), environmental issues and scaffolding, cranes and plant.
Defence Geographic Centre	No comment.

Public Representations	
The application was advertised twice, firstly when the original application was received (Feb 2020) and secondly when amended documents and plans were received (Oct 2021). In both instances letters of notification were sent to property addresses in the vicinity of the site and the application was advertised by both site notice and press advert.	
	Objection/ observations
Original Consultation	• Opposed to loss of retail units that serve local residents. • Parking and access to facilities being made worse. • Height of new buildings. • Loss of sunlight. • More consideration needed for working from home units.
Re-consultation	• Concern from one about the potential impact on the neighbouring development and asking to be a Rule 6 party at the Public Inquiry. • Concerns about additional dwellings proposed in the area.

5. Relevant Legislation, Policy, and Guidance

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

National Planning Policy Framework (NPPF) (2021)

The following NPPF chapters are the most relevant (others apply to a lesser extent):

2. Achieving sustainable development
4. Decision-making
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy
7. Ensuring the vitality of town centres
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
14. Meeting the challenge of climate change, flooding and coastal change
16. Conserving and enhancing the historic environment
Annex 2: Glossary

Planning Practice Guidance (PPG)

Sections of particular relevance include:

- Air Quality
- Build to Rent
- Climate Change
- Community Infrastructure Levy
- Design: process and tools (and associated National Design Guide)
- Environmental Impact Assessment
- Healthy and Safe Communities
- Historic Environment
- Housing needs of different groups
- Land affected by contamination
- Natural Environment
- Noise
- Open space, sports and recreation facilities, public rights of way and local green space
- Planning obligations
- Renewable and low carbon energy
- Town centres and retail
- Transport evidence bases in plan making and decision taking
- Travel plans, Transport Assessments and Statements
- Use of planning conditions
- Viability
- Water supply, wastewater and water quality

Other Government Guidance which is a material consideration

The National Design Guide (2019)
The National Model Design Code (July 2021)
HM Government: Crowded Places: The Planning System and Counter-Terrorism (2012)
Historic England: Advice Note 4 "Tall Buildings" (2015).
Sustainable drainage systems policy – Written statement 18 December 2014
Reading Borough Local Plan 2019

5.2 The Reading Local Plan Adopted 2019 is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It replaced the three previous development plan documents – the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015). It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. Reading has launched a 2050 vision for the town as a smart and sustainable city by 2050.

The following local policies and guidance are relevant:

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION
CC3: ADAPTATION TO CLIMATE CHANGE
CC4: DECENTRALISED ENERGY
CC5: WASTE MINIMISATION AND STORAGE
CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT
CC7: DESIGN AND THE PUBLIC REALM
CC8: SAFEGUARDING AMENITY
CC9: SECURING INFRASTRUCTURE
EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT
EN2: AREAS OF ARCHAEOLOGICAL SIGNIFICANCE
EN3: ENHANCEMENT OF CONSERVATION AREAS
EN4: LOCALLY IMPORTANT HERITAGE ASSETS
EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST
EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT
EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE
EN9: PROVISION OF OPEN SPACE
EN10: ACCESS TO OPEN SPACE
EN12: BIODIVERSITY AND THE GREEN NETWORK
EN13: MAJOR LANDSCAPE FEATURES AND AREAS OF OUTSTANDING NATURAL BEAUTY
EN14: TREES, HEDGES AND WOODLAND
EN15: AIR QUALITY
EN16: POLLUTION AND WATER RESOURCES
EN17: NOISE GENERATING EQUIPMENT
EN18: FLOODING AND DRAINAGE
EM1: PROVISION OF EMPLOYMENT
EM2: LOCATION OF NEW EMPLOYMENT DEVELOPMENT
EM3: LOSS OF EMPLOYMENT LAND
EM4: MAINTAINING A VARIETY OF PREMISES
H1: PROVISION OF HOUSING
H2: DENSITY AND MIX
H3: AFFORDABLE HOUSING
H4: BUILD TO RENT SCHEMES
H5: STANDARDS FOR NEW HOUSING
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE

TR1: ACHIEVING THE TRANSPORT STRATEGY
TR2: MAJOR TRANSPORT PROJECTS
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
TR4: CYCLE ROUTES AND FACILITIES
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING
RL1: NETWORK AND HIERARCHY OF CENTRES
RL2: SCALE AND LOCATION OF RETAIL, LEISURE AND CULTURE DEVELOPMENT
RL5: IMPACT OF MAIN TOWN CENTRE USES
OU1: NEW AND EXISTING COMMUNITY FACILITIES
OU5: SHOPFRONTS AND CASH MACHINES
CR1: DEFINITION OF CENTRAL READING
CR2: DESIGN IN CENTRAL READING
CR3: PUBLIC REALM IN CENTRAL READING
CR4: LEISURE, CULTURE AND TOURISM IN CENTRAL READING
CR5: DRINKING ESTABLISHMENTS IN CENTRAL READING
CR6: LIVING IN CENTRAL READING
CR7: PRIMARY FRONTAGES IN CENTRAL READING
CR8: SMALL SHOP UNITS IN CENTRAL READING
CR9: TERRACED HOUSING IN CENTRAL READING
CR10: TALL BUILDINGS
CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

Supplementary Planning Documents

- Reading Station Area Framework (2010)
- Sustainable Design and Construction (2019)
- Parking Standards and Design (2011)
- Employment, Skills and Training (2013)
- Affordable Housing (2021)
- Planning Obligations under S.106 (2015)

Other Reading Borough Council Documents:

- Reading 2020 Partnership: Sustainable Community Strategy (2010/11)
- Central Reading Parking Strategy (2004) and Interim Parking Strategy (2011)
- Reading Borough Council's Cultural Strategy: A Life Worth Living
- Reading Biodiversity Action Plan (2021)
- Local Transport Plan 3: Strategy 2011-2026 (2011)
- Tall Buildings Strategy 2008
- Tall Buildings Strategy Update Note 2018
- Reading Open Space Strategy (2007)
- Reading Open Space Update Note (2018)
- Reading Tree Strategy (2021)
- Strategic Housing Market Assessment (2016)

Planning (Listed Buildings and Conservation Areas) Act 1990

5.3 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

5.4 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the

desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

5.5 The application proposals are subject to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and are supported by an Environmental Statement issued pursuant to these Regulations. Much of the supporting technical information for the applications is contained in the Environmental Statement and discussed in a later section of this report.

6. Preliminary Matters

Structure of the Application

6.1 The submission material confirms that the application site is owned by a "fund" who will not occupy the ultimate development and may choose not to develop the scheme themselves. The chosen approach is therefore, to pursue an outline planning permission that would provide a degree of planning certainty, but also the necessary flexibility so that the exact form and layout of the ultimate scheme could be brought forward under reserved matters.

6.2 The application is therefore presented as an outline application with all matters reserved. This means that in considering the merits of the development as set out in the description of development, all aspects of development, such as the specific location of accesses, internal development roads (including between the adjoining site at 80 Caversham Road – RMG site), the specific quantum and composition of development, layout, built form, landscaping and open spaces, will eventually have to be subject to reserved matters applications to secure the final detail of those elements.

6.3 The application is accompanied by parameter plans within a Planning Application Booklet. These are submitted so as to set certain points, at this outline stage, that would guide detailed proposals submitted via, what is likely to be, a number of applications at reserved matters stage. This assists the Local Planning Authority in being able to assess that the amount and type of development could be accommodated in an acceptable manner and assists the applicant in providing more certainty over the extent of development that would be acceptable across the application site within those parameters.

6.4 The parameter plans submitted each represent different things.

- PP-100 (Development Footprint) defines the developable area within which the proposed development would be delivered, inclusive of buildings.
- PP-101 (Site Access & Egress) defines areas which site access and egress would be provided.
- PP-102 (Building Plots) seeks to agree the broad Areas within which each plot would be delivered on across the development site.
- PP-103 (Plot Heights) shows the maximum heights of plots, setting an overall envelope for the built form development.
- PP104 (Basement Footprint) defines zones for providing basements up to 1.5m below ground level.
- PP105 (Phasing Overview) describes a broad approach to the phased development of plots A-D from west to east. The plan is described as 'for illustrative purposes only' and cannot, therefore, be considered a Parameter Plan.
- P111-Phase 1 shows the approximate location of Phase 1 buildings (Plot A) and public realm, along with the approximate location of an access road running north-south between Plots A and B. The detailed location of buildings remains to be fixed through reserve matter applications.
- P112-Phase 2 shows the approximate location of Phase 2 buildings (Plot B). Phase 2 provides no corresponding public realm implementation. The detailed location of buildings remains to be fixed through reserve matter applications.
- P113- Phase 3 shows the approximate location of Phase 3 buildings (Plot C). The detailed location of buildings remains to be fixed through reserve matter

applications. An approximate area of 'new landscaped space' is shown with the detailed location fixed at the reserve matters stage.

- P114-Phase 4 shows the approximate location of Phase 4 buildings (Plot D). The detailed location of buildings remains to be fixed through reserve matter applications.

6.5 As far as officer determine, the outline application seek approval from the following documents

- Planning application booklet and parameter text
- Set of parameter plans
- Design code

6.6 The post outline stages will need to be consistent with these documents being submitted for approval as part of the outline planning application unless expressly stated in the submitted documentation or attached planning conditions.

6.7 The application is seeking a highly flexible outline permission which allows any respective reserved matters permission for any sub-phase of the development to respond to what are at the present time rapidly changing market conditions. It is accepted that an outline application for a site of this scale ensures the maximum reasonable degree of flexibility and maintains viability over what is likely to be an uncertain timeline for delivery. This is consistent with paragraph 9.2 of the Reading Station Area Framework (2010) which supports a "*…flexible approach within the broad parameters of policy, recognising that developers and investors need, as far as reasonably possible, to be free to define the particular mix and content of individual schemes*". The proposal carries forward the approach of approved schemes within the Station/River Major Opportunity Area like Station Hill, through the utilisation of Parameter Plans and Design Codes which fix clear limits on the nature and scale of development.

<u>Environmental Impact Assessment</u>

6.8 It is recognised by all parties that the application is considered to be development that requires the submission of an Environmental Statement (ES) under the Environmental Impact Assessment Regulations 2017. The requirement for an EIA is to assess the likely significant effects of a proposed development upon the environment. The ES is required to provide the LPA with sufficient information about the potential effects of the development prior to a decision being made on the planning application. The process normally involves the submission of a screening and scoping opinion to the LPA prior to submission of an ES with an application.

6.9 The information provided as part of the ES has been taken into account in the determination of the application.

6.10 The purpose of a screening opinion is to consider the development in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The key issues for and screening consideration would be:

- *Whether the proposed development would comprise a Schedule 1 or Schedule 2 development for the purposes of the Regulations; and if so,*
- *Whether the development is EIA development requiring any future planning application to be accompanied by a full Environmental Statement being mindful*

of factors such as the nature of the development, size and location and the requirements of Schedule 3 of the Regulations.

6.11 In any such assessment, the applicant is obliged to provide enough information about the proposed development for the Council to make an adequate assessment, such as providing a description of the development and a plan of the site location. Such information was received as part of the pre-application enquiry for the basis of these requirements.

6.12 The proposed development would not have fallen within any of the categories of development listed in Schedule 1 of the Regulations, which comprise potentially the most significantly harmful forms of development in terms of environmental risk. Therefore, the proposal was considered against whether it fell within the remit of Schedule 2 of the Regulations. The proposal would have exceeded the subcategory 10 (b) threshold for `urban development projects' as the site area is for more than 150 dwellings. The proposal would have been assessed in accordance with Schedule 3 of the Regulations.

6.13 Schedule 3 of the 2017 Regulations sets out three categories for consideration:

1. Characteristics of development;
2. Location of Development; and
3. Types and characteristics of the potential impact.

6.14 Given the similarities of characteristics, location and potential impact of the development when considered against the 2017 Regulations and the ES determinations made on directly adjoining strategic sites, the Applicant and LPA were in agreement that the development would constitute EIA development and an Environmental Statement would be required. As such no screening opinion was submitted, and a Scoping Request was submitted instead.

6.15 If the LPA were to have formally considered an ES Screening Opinion, it would have been the LPAs position that having regard to the details of the proposed development and to the selection criteria set out in Schedule 3 of the 2017 Regulations, the LPA would have adopted a screening opinion to the effect that the development proposed is likely to have significant effects that cannot be otherwise considered through a planning application alone. Accordingly, it would have been Council's screening opinion, in accordance with Regulations 4 and 5 that the proposed development would have constituted EIA development and that an Environmental Statement would have been required to accompany any planning application in accordance with the 2017 Regulations.

6.16 Regulation 15 of the EIA Regulations allows the Applicant to ask the LPA to state in writing their opinion as to the scope of the ES. The report constituting a formal request for an EIA Scoping Opinion from the LPA was submitted on 5th December 2019 following an email setting out relevant matter on behalf of the LPA on 6th November 2019.

6.17 The purpose of this Scoping Report was to agree with the LPA the proposed scope of the EIA and the approach to be adopted for the technical assessments to be scoped within the EIA, as well as to facilitate wider consultation with statutory consultees and key stakeholders who may have an interest in the likely significant environmental effects of the proposed development. The correspondence dated the 6th November

2019 from the LPA set out the realistic and accurate scenarios to be considered as part of the ES and identified those consultees which will be involved.

6.18 A planning application was submitted on 26th February 2020 via planning portal. The application was accompanied by an Environmental Statement covering the following topics:

- Socio- Economics;
- Air Quality;
- Noise & Vibration;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing & Solar Glare and
- Townscape & Visual Impact.
-

6.19 The ES Appendices included:

- Ground Contamination Preliminary Risk Assessment;
- Ecological Impact Assessment;
- Flood Risk Assessment (including Drainage Strategy); and
- Historical Environment Assessment.

6.20 The planning application was submitted before the LPA had an opportunity to issue a formal Scoping Opinion. Therefore, the Applicant undertook the ES in accordance with the proposed scope and methodologies as set out in the submitted EIA Scoping Report. The LPA raised no objection to this in order to prevent any unnecessary delays in the application process and neither party was considered to be prejudiced.

6.21 Following the submission of the planning application and accompanying ES, the purpose of issuing a scoping opinion fell away. Notwithstanding this, the LPA would have issued a scoping opinion to the effect that the following topic areas be reported in the ES:

- Socio- Economics;
- Air Quality;
- Noise & Vibration;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing & Solar Glare and
- Townscape & Visual Impact.

6.22 Upon issuing the ES with the planning application, the LPA has the opportunity to request additional information if it considers the ES to be inadequate. The adequacy of the ES is determined by comparison with the content requirements of the EIA Regulations. In this regard, the level of information submitted with this ES was consistent with the scoped topic areas and was deemed acceptable in accordance with the Regulations and feedback available at the time.

6.23 As part of the submission of additional and revised information in October 2021, the applicant provided revised section to the ES to sit alongside the original ES. The cover letter dated (8th October 2021) confirms that, "*The Environmental Statement Compliance letter reports on the implications of the proposed amendments in respect of the conclusions of the Environmental Impact Assessment (EIA) that was undertaken of the 2020 scheme and concludes that due to the minor nature of the proposed amendments, it is considered that there would be no material change to the predicted likely significant environmental effects reported in the 2020 EIA. With*

specific regard to the ES TVIA Chapter, this has identified that the amended parameters represent an improvement in terms of townscape and visual impacts due to the increased spatial separation between the development blocks". These matters are considered within the main body of the report.

6.24 The full ES, which comprises both the original ES and the revised sections to the ES, was subject to formal consultation as part of consultation on the outline application and its amendments. The conclusions of the ES are noted and it is considered that the EIA process has been undertaken appropriately. As the proposed development could be brought forward in a number of different forms within the extent of the minimum and maximum use class parameters, the ES has been undertaken on the basis of adopting a 'worst-case' assessment approach, as described in ES Chapter 2: EIA Process and Methodology.

Housing Land Supply

6.25 The NPPF requires Local Planning Authorities to identify a five-year supply of specific deliverable sites to meet housing needs. Policy H1 of the Local Plan establishes a requirement to provide at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The Local Plan identifies a number of sites to meet housing need which are considered suitable for development, which includes CR11e, North of the Station, of which this site forms part.

6.26 Based on the Annual Monitoring Report (AMR) 2020-21, published in December 2021, Reading has 6.95 years' supply of housing land, which comfortably fulfils the NPPF requirement, and this supply does not rely on any housing delivery on this site. This means that policies relating to housing delivery in the borough's Local Plan are currently considered up to date and afforded full weight. This also means that paragraph 11 of the NPPF (the tilted balance) is not engaged. It is also expected, based on the AMR Housing Trajectory that the policy H1 requirement will be exceeded over the full plan period to 2036, assuming that the CR11e site is developed based on the allocated number rather than the significantly higher numbers associated with the current applications. Therefore, residential development for the level of housing proposed in this application is not required purely in order to deliver housing requirements. However, the policy H1 requirement is a minimum, and the development of the site for residential to boost housing supply and achieve regeneration objectives is a desirable outcome where it meets other relevant planning policies and considerations.

Sustainable Development

6.27 The National Planning Policy Framework (NPPF) sets out the Government's planning policy for England and places an emphasis upon delivering sustainable development incorporating objectives for economic, social and environmental protection. These principles seek to balance growth and local needs of the community against protection of the natural, built and historic environment. This intends for development to be provided in accessible locations and in proximity to the community which it serves.

6.28 The NPPF sets out a presumption in favour of sustainable development running through both plan-making and decision-taking. The three dimensions to achieving sustainable development are defined in the NPPF as: economic, social and environmental. Paragraph 11 of the Framework indicates that, for decision taking,

where Local Plan policies are up to date: development proposals that accord with the Development Plan should be approved without delay.

6.29 Both the Local Plan and the NPPF require a positive approach to decision-taking to foster the delivery of sustainable development. The three dimensions of sustainable development as defined in the NPPF and referenced within the Local Plan at Policy CC1, repeating the aims of the NPPF in approving development proposals that accord with the Development Plan.

6.30 In having regard to the three objectives of sustainable development, it is acknowledged that there are likely to be a number of material benefits derived as result of the development. These will be considered and brought together under the planning balance at the end of the report depending on whether officers consider the development to conflict with the Development Plan.

7. Principle of Development

7.1 Planning law requires that applications for planning permission must have regard to Section 38 (6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the development plan for the area is the Reading Borough Local Plan 2019. As described, at a national level, NPPF constitutes guidance which the Local Planning Authority (LPA) must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but is a material consideration in any subsequent determination.

7.2 The main issue for consideration under this section is establishing the principles of a major mixed use residential led scheme and the contribution the development would make towards Reading borough's housing and commercial development needs, having particular regard to its designation within the development plan and any other material planning considerations like the amount of development, movement principles, mix and density.

<u>The Development Plan</u>

Reading Borough Local Plan 2019

7.3 The Reading Borough Local Plan 2019 identifies Central Reading as the focus for intensive, mixed-use development and a number of important strategic site allocations. Section 5 of the Local Plan sets out the strategy for Central Reading. Paragraph 5.2.2 acknowledges that a key challenge will be to provide an appropriate scale and mix of uses that make a major contribution to meeting Reading's needs, are viable, well connected to the core, particularly the station and the transport interchange, and that help to achieve a modern 21st century town centre while protecting and enhancing the historic interest and other special qualities of the town.

7.4 The Local Plan contains a suite of general policies for Central Reading, which focus on design, public realm, leisure, culture and tourism, the mix and quality of residential and non-residential development, and the location of tall buildings.

7.5 Section 5.4 of the Local plan contains Site-Specific Policies for Central Reading. This section identifies the application site as being part of the CR11 Station/River Major Opportunity Area site allocation. The vision for this the CR11 allocation is that *"The station/river area will be a flagship scheme, extending the centre and providing a mixed-use destination in itself and centred on the new station and public transport interchange. It will integrate the transport links and areas northwards towards the River Thames and into the heart of the centre."*

7.6 Policy CR11 states that:

> "*Development in the Station/River Major Opportunity Area will:*
>
> *i) Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix;*

ii) Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;
iii) Provide developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces;
iv) Safeguard land which is needed for mass rapid transit routes and stops;
v) Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;
vi) Give careful consideration to the areas of transition to low and medium density residential and conserve and, where possible, enhance listed buildings, conservation areas and historic gardens and their settings;
vii) Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;
viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space; and
ix) Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.

Development of the station and interchange was completed in 2015. Development in surrounding areas will be in line with the following provisions for each sub-area"

7.7 The CR11 Station/River Major Opportunity Area strategy is made up of nine (a-i) sub-areas. The application site is located within the CR11e sub-area. This sub-area 'North of Station', is given as approximately 6.71 ha and is detailed to accommodate an indicative potential of between 640-960 dwellings, 50,000-80,000 sqm net gain of offices, 3,000-6,000 sqm net gain of retail and leisure, hotel uses. The location of the CR11e sub-area is shown outlined in red in Fig 4 below.

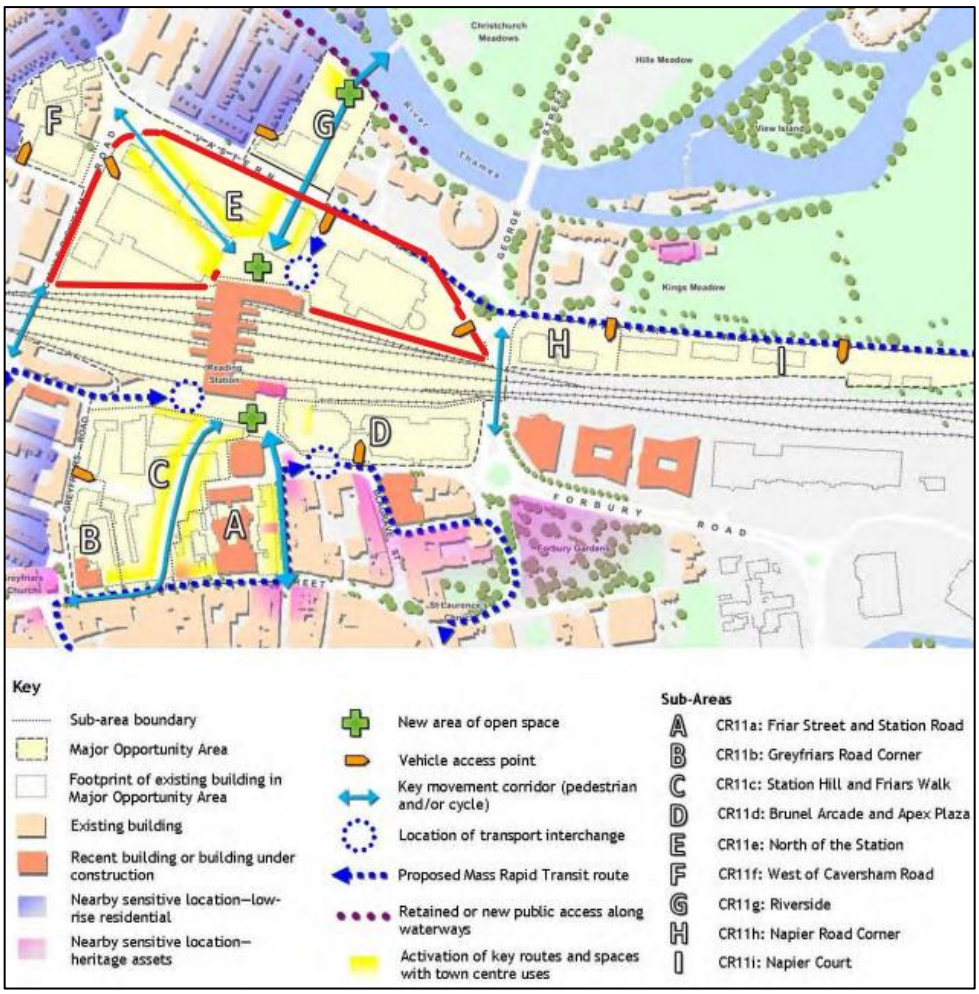


Fig 4: Station/River Major Opportunity Area Strategy taken from Figure 5.3 of the Local Plan with CR11E allocation identified in red:

7.8 The CR11e sub-area consists of land bounded by the railways line to the south, Vastern Road to the north, Caversham Road to the west and Vastern Road roundabout to the east. The sub-area is dividend onto three separate land parcels within separate ownership. This can be seen in Fig 5 below.

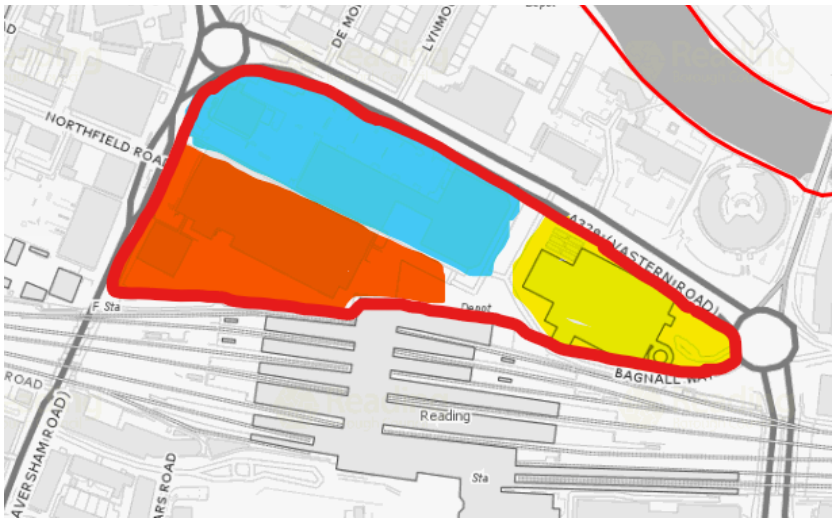


Fig 5: Approximate location of the three land holdings which make up the CR11E site allocation

7.9 The appeal site at Vastern Court Retail Park consisting of approximately the northern third of the CR11e allocation (highlighted blue). The southwestern third at the RMG site is under the separate ownership and here-to referred as 'The former RMG site' (highlighted red). This portion of the site allocation was previously granted outline permission under application 11/00276/OUT (Former Sorting Office). This permission has now lapsed, but an outline application at the RMG site for the demolition of all existing buildings and structures & erection of new buildings ranging between basement and 2 – 24 storeys in height, providing 620 residential units, office accommodation, flexible ground floor uses, a community centre, health centre uses & various works (Ref 182252) is currently pending consideration. The final third of the sub-are is occupied by the Network rail multi-storey car park (highlighted yellow).

7.10 The specific Policy wording for CR11e (North of Station) states:

"There will be retail and leisure development on the ground floor activating the streets and spaces including the new northern station square, with other uses including residential and offices on upper floors. Retail will have good pedestrian links to, and will not have a detrimental impact on, the rest of the retail core of the centre. Public car parking will be provided. A high-quality route incorporating a green link should be provided through to the Thames. Development should take account of mitigation required as a result of a Flood Risk Assessment and should consider opportunities to open up the culverted Vastern Ditch and enhance it as an ecological feature."

Reading Station Area Framework (2010)

7.11 The Reading Station Area Framework (RSAF) was adopted in 2010 and constitutes a detailed planning framework for the station area, focused on the upgrade of Reading Station and the consequent regeneration of the surrounding area. It provides a masterplan for the development of the wider area and allowing the various land parcels to come forward in a coordinated manner. The preparation of this development framework is manifestly in recognition of the need for a comprehensive approach to the area's future redevelopment.

7.12 Whilst adopted in 2010, the Local Plan makes clear that the RSAF continues to carry weight. It states in paragraph 5.4.9 that *"A Station Area Development Framework was prepared for most of this area in 2010 to provide more detailed guidance, and a Station Hill South Planning and Urban Design Brief covering sites CR11a, b and c dates from 2007. These documents continue to apply, alongside any future Supplementary Planning Documents."*

7.13 Paragraph 10.1.5 of the Reading Borough Local Plan 2019 confirms that the Reading Station Area Framework 2010 (RSAF) relates to the development allocation under CR11 and remains in place. Therefore, the RSAF continues to have the status and weight of an active Supplementary Planning Document (SPD), supplementing policy CR11 and its sub-area policies within the Local Plan remains a material consideration in the determination of this planning application and any appeal.

7.14 The RSAF proposes that the Northside would be arranged in a grid of city-scale blocks, including major commercial and residential uses and sets out clear aspirations for the scope for tall buildings as local landmarks within this area. The focus of development in the Northside, both commercially and in transport terms,

should be the Northern Station Entrance. There should be two principal axes ('spines') for public realm. North-South, a new Station Square would connect via a new public realm to the now constructed pedestrian/cycle bridge cross the Thames. This is part of a longer Kennet-Thames spine highlighted in paragraph 5.9 of the Framework, and elsewhere. Paragraph 7.10 and figure 7.2 of the Framework also make clear that there should be new views created between the station and Thames. East-west, a new high-quality public realm should be provided for by a new street linking to Caversham Road. This will be discussed in further detail later on in this report.

Supplementary Planning Documents

7.15 Notwithstanding the RSAF's status as an established SPD, it is also relevant that the Council has recently adopted a new Affordable Housing SPD in March 2021 along with a Sustainable Design and Construction SPD in 2019, which will be covered in separate relevant sections.

<u>Amount of development</u>

7.16 Para. 9.2 of the RSAF explains that *"Although the policy [Policy RC1, broadly replaced by Policy CR1] sets out appropriate ranges of land uses in certain locations, it contains as little prescriptive detail as possible. Likewise, the Framework does not prescribe specific or rigid land uses, but encourages a flexible approach within the broad parameters of policy, recognising that developers and investors need, as far as reasonably possible, to be free to define the particular mix and content of individual schemes."*

7.17 This degree of flexibility remains consistent with the paragraph 82 d) in that policies are required to be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

Residential use

7.18 The quantum of residential development proposed as part of the original application submission was previously raised as a principle concern by the Council's Planning Policy Team. The flexibility of land uses proposed at that stage could have resulted in zero dwellings being provided on one of the largest strategic residential allocations within the Local Plan. However, the revised information submitted in October 2021 has significantly altered this position. The application now proposes a fixed range of between 600 and 1,000 dwellings.

7.19 From a strategic perspective, the application therefore has to be considered against the highest number proposed within the parameter and description of development. When taken together with the proposed application at the former RMG site (620 dwellings), the total dwellings delivered on the CR11e allocation could range between 1,220-1,620 dwellings, not including any possible longer-term provision on the Network Rail car park to the east. As described above, the indicative provision in policy CR11e is 640-960 dwellings, so it is clear that the proposal would exceed this indicative range considerably.

7.20 However, the ranges expressed in the allocation policies are not hard and fast requirements. Paragraph 5.4.5 of the Local Plan states that: *"It should be noted that, to an even greater extent than other areas, development capacity can vary significantly on high density town centre sites, and these figures are therefore an*

indication only. Of greatest importance will be the creation of a high-quality, well-designed mixed-use destination, and there is potential for development figures to vary in order to achieve this aim."

7.21 Therefore, the fact that the amount of residential would exceed the range expressed is not in itself a policy conflict. What is of importance is the degree to which a high quality well-designed mixed-use destination can be delivered at Reserved Matters stage and this remains the primary driver for this site to contribute to delivering a flagship scheme in the station/river area.

7.22 The submitted Environmental Statement (ES) assesses the impact of delivering up to 1,000 dwellings, as a sensitivity test. The ES includes an assessment of the likely significant effects of the proposed development with other developments that are either approved, current applications awaiting decisions, or which have an allocation within the Local Plan.

7.23 The indicative scheme within the Design and Access Statement (DAS) describe how a scheme for 628 dwellings and other uses could be distributed around the site in one particular composition of development. In particular, the Building Heights Plan *PP-102 P2* provides guidance on what ranges of densities would be appropriate for each part of the site. Without detailed analysis of the indicative scheme, this indicative scheme includes the maximum amount of office accommodation proposed within the revised submission. Whilst subject to detailed analysis at each respective reserved matters stage, the indicative scheme appears to support the position that a development of between 600 and 1,000 dwellings could be accommodated in some form.

7.24 It would be reasonable therefore for the LPA to condition this upper and lower proposed quantum of residential development on site and no objection is therefore raised to the amount of residential proposed. Whilst therefore, there is no objection in principle to the redevelopment of the site for housing and the mix of uses proposed, it is the quantum of development indicated in the supporting documentation and the parameter plan in particular, that has given rise to objections on a number of issues as out in the following chapters.

Build to rent

7.25 The Application proposes up to 1,000 dwellings. These could be mix of standard open-market housing, affordable housing, or fall within the definition of Build to Rent (BtR) or referred to as Private Rented Scheme (PRS). It is therefore reasonable to ensure that appropriate controls are in place over such residential use at outline stage, on the basis that S106 controls cannot be introduced at Reserved Matters stage and the applicant has not expressly excluded BtR from their proposals.

7.26 Government Policy on BtR is set out in the National Planning Practice Guidance (NPPG accompanies the NPPF) at: https://www.gov.uk/guidance/build-to-rent. Build to Rent is defined in the NPPF Glossary as *"Build to Rent: Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."*

7.27 The guide at national level is for 20% of the dwellings on such scheme to be Affordable Housing (Affordable Private Rent tenure) on site unless a commuted payment or other form of provision is agreed with the LPA. The matter of Affordable Housing is addressed is a separate section below).

7.28 The process for managing affordable private rent units should also be set out in the Section 106 agreement. This should set out in the parameters of any lettings agreement, so too will rent levels, apportionment of the homes across the development, a management and service agreement, and a marketing agreement setting out how their availability is to be publicised. The national guidance addresses the question of eligibility criteria for occupants and recommends 3-year minimum tenancies.

7.29 Policy H4 in the Local Plan specifically considers Build to Rent Schemes. This policy includes a 20-year minimum period over which the Build to Rent tenure requirement is to be retained (together with other standards). More detail on the matters that will need to be secured by S106 relating to Build to Rent are set out in the Affordable Housing SPD (adopted March 2021). The detailed Heads of Terms are set out in the recommendation section at the head of this report, and subject to inclusion in any S106 agreement no objection is raised in this regard.

Office use

7.30 The revisions made to the application in October 2021 result in a very significant reduction in the maximum office floorspace to be provided (Use Class B1(a) and updated Class E(g)(i)), from a maximum of 113,000 sqm to 24,500 sqm. No minimum amount of office floorspace is set, with office accommodation limited to Plot D only (the block closest to the station). Whilst the quantum and spatial strategy for the allocation of offices accommodation can justifiably be controlled via specifically worded planning condition, the LPA must understand whether this maximum revised amount and no minimum, conflicts with the objectives of the local plan and the specific aspirations of the site allocation.

7.31 The whole CR11e site allocation is identified to accommodate a range of between 50,000 - 80,000 sqm of office floorspace. As described in the policy comments, the adjoining application of the former RMG site proposes 18,906sqm of office use. This would equate to range of office provision within both these planned sites within the CR11e allocation delivering between 18,906 – 43,406sqm of office accommodation. Whilst below the range expressed in the policy, the under provision against this range across the whole allocation would not necessarily represent a reason for refusal in its own right, as the policy text makes clear that the ranges set out are a general guide, rather than a hard and fast policy requirement. Furthermore, the whole allocated site also covers the Network Rail car park so there is the potential for further office development to come forward at some point in the future.

7.32 However, as identified in the Planning Policy comments, there is a risk that should no office development be brought forward at all on this sub-area of the CR11e site allocation, the development may fail to deliver upon the mixed-use destination envisaged by the overarching Policy CR11 across the whole allocation. As described, a purely residential development could result in a location that has limited activity throughout the working day and may not make best utilisation of land available in this highly sustainable location. The sub-area under Policy CR11e explicitly identifies office and residential development to both be among the upper floor uses, and therefore a proposal that did not provide any office would need to be accompanied

by robust justification. At this stage, no such justification has been provided and as such the outline development parameters conflict with the site allocation and local plan.

7.33 In considering this conflict against the structure of the application and opportunity to control certain parameters, it would be reasonable therefore for the LPA to ensure any condition securing the proposed upper and lower range of this type of floorspace. Ensuring minimum base level of office floorspace that enables the necessary degree of flexibility sought by the applicant but also continues to ensure the application site is able deliver a mixed-use development as expected by the Local Plan, that also contributes to the identified remaining office need within the borough. Given the size of the site and the contribution the adjoining former RMG site is able to deliver should development be approved and implemented, it is considered reasonable to establish what minimum level of office accommodation would be needed to provide a sufficient level of activity throughout the working day within Plot D and the sub-phase as a whole. It is considered that this proportion should be sufficient to generate activity during working hours and should be sufficient that it contributes towards a genuine mix of uses within the site rather than a small ancillary element. It is considered that 5% of total floorspace represents an appropriate minimum so that office would contribute to a genuine mix of uses. This would equate to 4,543 sqm, similar to other notable office buildings in the town centre such as Great Brigham's Mead or Fountain House.

7.34 This would be controlled through a restrictive condition that would ensure all subsequent phases of development submitted under reserved matter shall not exceed the upper 24,500sqm of offices, but provide no less than 5% in order to ensure in conjunction with the adjoining former RMG site a minimum level of office accommodation would be delivered overall on the CR11e allocation as part of these two planned schemes. This would ensure that the CR11e allocation would deliver between 23,449sqm and 43,406sqm of office accommodation.

7.35 Finally, one of the other concerns explored in the initial planning policy response to the application in April 2021 was whether the maximum amount of office proposed would exceed the level of need identified in the Local Plan and therefore would result in an imbalance between office and residential. However, the much-reduced maximum level of offices and much increased minimum level of residential have changed this picture significantly since October 2021

7.36 The detailed assessment undertaken by the LPA concluded that the development (as now proposed), when considered alongside completions and commitments, would not exceed the identified level of office need in the Local Plan, and would not therefore exceed the levels of employment development set out in core employment Policy EM1. No objection is therefore raised in regard to the amount of office use subject to the above condition.

Other commercial use

7.37 Policy CR11e identifies a net gain of retail and leisure floorspace within the allocated site of 3,000 to 6,000 sqm. The revised development parameters are for a minimum of 2,000 sqm and a maximum of 7,000 sqm (GEA) of A1 to A5 and D1 to D2 uses on this site.

7.38 Existing retail/restaurant floorspace at Vastern Court retail Park totals 6,949sqm (GIA). The amount of retail and community uses within the adjoining RMG site

application totals 2,464 sqm (GIA). In total across the CR11e allocation, this would mean a net change of between a loss of 2,485sqm and a gain of 2,515sqm. Therefore, even the maximum would fall below the range expressed in the allocation, albeit accepting that there is possible scope for additional development on the Network Rail car park site in the future.

7.39 However, it must be recognised that the retail landscape has changed significantly even in the time since the Local Plan was adopted in 2019. Changes to shopping habits have been accelerated by the Covid19 pandemic, and the degree to which these habits will be permanently altered in a post-pandemic world remains to be seen. As with other uses, the ranges stipulated by the allocation are indicative, with it highlighted within the supporting text to policy RL2 that there exists *"considerable uncertainty about the retail landscape after 2026"* (paragraph 4.6.9).

7.40 For this reason, the main consideration in terms of other commercial uses is the extent to which these commercial uses enliven the key streets and spaces rather than overall numerical floorspace or any desire for the re-provision of a low-density retail park arrangement. The streets and spaces of greatest importance are those identified as designated primary frontages in Policy CR7 of the Local Plan and shown on the Proposals Map, where uses should be within the defined set of uses (including the uses specified for the 2,000-7,000 sqm) and where there should be an active building frontage with a display window or glazed frontage at ground floor level, other than entrances to upper floors. For the purposes of this site, the main such frontages are either side of the north-south link from the station square towards the Thames and the east-west link from the station square towards Caversham Road.

7.41 The RSAF supplement this requirement which, in figure 9.3, applies the overall frontages to the likely development plots within the area, and corresponds broadly to the plots identified in this application. The key frontages would be the southern frontages of plots A and B, the southern and eastern frontage of plot C and the western and southern frontage of plot D. The RSAF in paragraph 9.6 states that these should be enlivened by active, public uses at the ground floor.

7.42 It is therefore critical that, as a minimum, the active commercial uses suffice to enliven these critical ground floor frontages. The illustrative scheme concept within the revised DAS (p361) shows 3,600 sqm (GIA) of A1/A3 floorspace which is sufficient to enliven almost all ground floor frontages, but actually shows that around half of the eastern side of the key north-south route could be taken up by an office frontage. This would be contrary to Policy CR7 and the RSAF and fail to provide activation to one of the most important strategic routes in the town centre.

7.43 Therefore, it would be necessary to specify via condition (in tandem with the amount and range of non-residential uses) the minimum proportions of primary, secondary and minor frontages that needs to be activated order meet the LPA policy aspiration for this key location. These minimum proportion would be based on the development plots in the parameter plans, and detail within the Design Code document. Whilst a maximum of 7,000 sqm would certainly be sufficient to achieve this and it may be possible to achieve with the minimum of 2,000 sqm (once allowances are made for upper floors entrance), the floorspace parameters alone are considered insufficient to control this at reserved matters stage. Such a condition would ensure a greater degree of certainty in successfully providing active ground floor commercial floorspace through the submission of any reserved matters application.

Summary

7.44 In summary, whilst the amount of residential would exceed the range expressed in the CR11e allocation, it does not itself constitute a policy conflict subject to a high quality well-designed mixed-use destination being delivered at Reserved Matters stage. In terms of non-residential uses, a condition securing a minimum base and maximum ceiling of office floorspace would ensure the application site contributes to securing the high-quality mixed-use destination required, whilst controls over the minimum proportions of primary, secondary and minor frontages would ensure the key routes identified in policy are enlivened by active uses.

Land use and density

Land use

7.45 The proposals are for a wide range of flexible uses within the buildings. Within the parameter plans, the proposal includes the following flexible uses:

- Residential use (Class C3 and including Private Rented Sector);
- Office use (Use Class B1(a);
- Non-residential uses (Use classes A1, A2, A3 (retail), A4 (public house), A5 (take away), D1 and D2 (community and leisure);

Please see Fig 6 below with proposed floorspace ranges on each block.

Use Class		**Plot A**	**Plot B**	**Plot C**	**Plot D**	**Total GEA sqm (excluding plant)**
C3 Residential units	Min	48,000				48,000
	Max	16,400	19,750	23,200	20,650	80,000
B1a Offices	Min	0	0	0	0	0
	Max	0	0	0	24,500	24,500
A1-A5, D1-D2 Retail units/ Community Facilities/ Gym	Min	2,000				2,000
	Max	7,000	7,000	7,000	7,000	7,000

Fig 6 -Proposed total floorspace range Source: Planning Application booklet

7.46 Particular flexibility is sought within this outline permission with a wide range of uses set within an upper limit of 90,850sqm (Gross External Area) for all floorspace of a combination to be agreed. This would be secured by planning condition and determined equally by controls over the maximum scale (height and mass) of the buildings. The amounts of different uses proposed above in figure 6 exceed this figure on the basis that this allows for different schemes to come forward at Reserved Matters stage (e.g. more heavily commercial in character/more residential/more of a balanced mix), but none would exceed the defined cap of 90,850sqm. A minimum 'guaranteed' floorspaces for residential and non-office commercial uses are proposed, however as described in paragraph 7.30, office use is more 'flexible 'whereby a maximum of 24,500sqm could be provided, or none at all.

7.47 As described earlier in the report, this level of flexibly is not supported by the LPA, however it is considered reasonable, necessary and relevant to secure via condition a minimum base level of office accommodation to ensure a truly mixed-use scheme is brought forward in accordance with the aspirations of the local plan and RSAF. It would not be appropriate for ay one particular use to dominate the development, or ground and lower ground floors as this would conflict with the various policy aims in terms if mixed use, active frontages and a vibrant public realm. It is recommended that a minimum of 1000sqm retail or leisure (A1, A2, A3, A4, A4, D1, D2) uses be secured by condition. This should be considered alongside the parameter plan requirements for active frontages. A key issue on this site is ensuring that vitality is maintained to parts of the buildings fronting onto the public realm.

7.48 With regard to existing retail provision at Vastern Court Retail Park it is understood that the leases of a number of existing retailers are due to expire in the next few years and any decision to renew would remain a commercial one for each respective retailers. Furthermore, such matters are unable to be controlled through any planning application submitted to the Council. With regard to the replacement retail provision included within Figure 6, ground floor commercial space is proposed via the parameters and indicative scheme. This is intended to be occupied for shops, restaurants and other non-residential activating uses. Dependant on the arrangement of the commercial and retail units that come forward for each phase within any respective reserved matter application, there remains no reason why existing retailers at Vastern Court Retail Park could not be accommodated within the new development should it be commercially beneficial to do so. Alternatively, other new retailer may occupy these units. In responding to third party representations, the exact identity of any prospective commercial occupant is not known nor can be controlled by the LPA or through the planning system. However, the total floor space made available for a range of different uses can be.

7.49 One of a number of competing priorities for the Council is to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce a community's ability to meet its day-to-day needs. The range of similar convenience and retail opportunities do exist within the town centre. To resist this scheme at outline stage without recognition that the range of uses and flexibility offered would allow a mixture of commercial uses to meet day-to-day needs of the existing community, would be unjustified.

7.50 Added to the above the likely economic uncertainty caused by the Covid19 pandemic, it is unclear what the current retail environment will be for those existing retailers currently trading on site. Any longer-term impacts of Covid19 are unknown and difficult to predict at this point, as such there remains a high amount of uncertainty over the timescales and commercial decisions of existing retailers at Vastern Court.

7.51 Notwithstanding this, the uses proposed in the parameter plans are all recognised town centre uses and considered is acceptable in principle subject to refinement through recommended planning conditions/obligations (see recommendation at the head of this report) where necessary to mitigate for potential conflicts between uses and to ensure vitality, mixed use and overall good design.

7.52 It should also be clarified that use classes B1, A1, A2 and A3 would fall within new Use Class E; Classes A4 and A5 would be sui generis and the non-residential institutions and assembly and leisure uses (D1 and D2) will fall variously within new Classes F1 and F2, or will be deemed sui generis. However, it is the old use classes which are being used for this application as required under the regulations.

7.53 The redevelopment of the application site for the prosed uses would be acceptable in principle subject to the main issues listed above being satisfied and the site allocation policy requirements being met through relevant and necessary restrictions over the minimum and maximum uses.

Density

7.54 Achieving an efficient use of the land within the context of the site is recognised as a priority both at a national level through the NPPF and locally within the Local Plan. The NPPF states that LPAs should actively *"encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value"*. The Local Plan identifies the fact that there are considerable areas of underused land within Reading town centre. This includes the application site which is identified within the local plan allocation to accommodate development at significantly higher density.

7.55 Policy CC6 of the Local Plan makes the important link between the scale and density of development and its ability to support accessibility by walking, cycling and public transport to a range of services and facilities. This supports the approach that the densest and largest scale development should take place in the most accessible locations.

7.56 Policy H2 makes clear that the densities indicated will not be applied as hard-and-fast rules, and appropriate densities will be informed by a variety of factors, including the character and mix of uses of the area, accessibility and the need to: achieve high quality design, maximise the efficiency of land use; and minimise environmental impacts.

7.57 Within the Local Plan, indicative densities for different areas are set out in Figure 4.5 (See below). The supporting text goes onto acknowledge that the criteria discussed above may indicate that a different density may be appropriate based on the individual site characteristics.

Figure 4.5: Indicative density ranges (dwellings per hectare)

Town Centre	Urban	Suburban
Above 100	60-120	30-60

Fig 7: Local Plan Figure 4.5

7.58 This indicates that for sites located within the Town Centre and directly adjacent to the station, would have an indicative density of above 100 dwellings per hectare. It is important to note there is no upper limit is provided for the Town Centre.

7.59 In this instance there is a overriding need to make the most effective use of this allocated residential site when coupled with the significant need for housing in Reading and the need to maximise the efficient use of land, particularly brownfield land in such a location close to facilities.

7.60 The proposed development seeks a range of approximately 600 and 1000 residential units. This would equate to a density of between 339 and 564 dwellings per hectare (dph), on the whole of the application site area of `1.77 hectares – the gross area.

7.61 Whilst density is recognised as a useful indicator of whether housing targets are being met, it is not generally a good indicator of the likely form, quality or appropriateness of any scheme. It is considered that a higher density is not precluded yet must not come at the expense of overall form and quality of the scheme. Density therefore must be considered in tandem with all other policy criteria which consider the existing character of the area and issues such as design, amenity and public realm, which will be covered separately, yet is not likely to form a reason to rests this outline permission is isolation.

Dwelling Mix

7.62 Policy H2 of the Local Plan states that *"Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms."* Policy CR6 seeks to avoid an over-provision of 1-bed units in the town centre and provides an indication that a maximum of 40% of 1-beds would be supported.

7.63 Whilst this may be reflective of the existing situation in the area, Local Plan H2 requires a mix of housing (as set out in figure 4.6) which identifies a need for family homes of three or more bedrooms. This evidence, derived from the Council's SHMA 2016, sets a clear aspiration for a mix of dwellings tilted in favour of larger units. The revised unit mix now proposed still falls short of the proportion of 3 beds + required to provide a more desirable mix. Therefore, as it stands, the mix falls short of policy requirements and any formal submission would need to address this.

7.64 The development parameters propose a dwelling mix range of between 40-60% 1-bed or studio apartments. Further to this, the applicant has provided within the Indicative scheme contained with the Design and Access Statement, a residential mix of 45.7% one-bed (consisting of 12% studio and 33.7% one-bedroom flats), 41.6% two-bed, and 12.8% three-bed units. It is recognised that whilst marginally contrary to the objectives of the relevant policy in term of the proportion of smaller units, the indicative mix broadly reflects the fact that the development constitutes one of the most sustainable and central locations in the town suited to smaller units, and would likely be justified and deemed appropriate at a detailed application stage should it be accompanied by adequate justification.

7.65 Notwithstanding the indicative scheme proposed at outline stage, the final unit mix would be dependent on the specific arrangement of built form and composition of development types that come forward at Reserved Matters stage. Given the flexibility that is being proposed in terms of numbers, uses, built form etc, this is not an unreasonable approach for the LPA and developer to take. Furthermore, it should be clarified that this indicative mix would not be approved at outline stage, with the council reserving the right to consider each Reserved Matters application against Policy CR6 at stage.

7.66 A specifically worded dwelling mix condition would require full details of the residential numbers, mix, size of units and tenure (both for open market and affordable dwellings) in respect of the relevant phase of reserved matters and the development as a whole. This would allow the developer and the LPA the necessary flexibility to rightly consider the mix of each of the fours phase independently and cumulatively against the development as a whole, and carefully against the requirements of Policy CR6 and other material guidance which may be in force at the time these applications are made. No objection is raised in this regard.

Principle of development conclusion

7.67 The application complies with the main elements of the Development Plan in that it provides a high-density, mixed-use development, with tall buildings towards the Station. Furthermore, the recent Government statement that there should be a presumption in favour of sustainable development which provides economic growth is also considered to be a material consideration. Whilst therefore, there is no objection in principle to the redevelopment of the site for housing and the mix of uses proposed, it is the quantum of development indicated in the supporting documentation and the parameter plan in particular, that has given rise to objections on a number of issues as out in the following chapters.

8. Design

8.1 The Application is for Outline Planning Permission with all matters reserved, including the development's layout, scale, and appearance. At this outline stage, a judgment must be reached as to whether the proposed quantum and composition of development can be accommodated on the site whilst achieving the standards of design expected by National and Local Plan policy and guidance- including the RSAF.

8.2 The NPPF states development should be visually attractive because of good architecture, layout, with appropriate and effective landscaping and sympathetic to local character and history (Paragraph 130). Permission should be refused to develop a poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, considering any local design standards or style guides in plans or supplementary planning documents.

8.3 A range of materials accompanies the application, a small number of which are to be approved at this stage, with the remainder submitted for illustrative purposes only.

- Development Parameter Plans, to be approved at the outline stage, define the plot development areas, areas for streets open space and maximum heights.
- The Design and Access Statement describes the possible form and quality of the development. However, these details are not for approval at this stage and offer no guarantee that the development will come forward in the described way.
- DAS section 05 offers a 'Design Code' that will be used by the developer to guide the development of a detailed scheme- including a mixture of suggested mandatory and advisory guidelines.
- DAS section 07 includes an illustrative masterplan seeking to demonstrate how a detailed scheme could come forward in accordance with the Development Parameters and Design Code. The illustrative masterplan will not be determined at the outline stage.

8.4 The existing 'out of town' retail development with large high-bay sheds and extensive surface-level parking does not accord with the future vision for the Station Area and the wider Town Centre. The principle of high-density mixed-use redevelopment is therefore supported in principle. High quality sensitively designed and positioned tall buildings marking the significance of the rail station are also supported in principle.

8.5 There remain five areas of concern in relation to design and heritage matters:

- Layout, routes, and integration - the North-south link

- Scale, height, and massing
- Setting/Views
- Heritage
- Public Realm

<u>Layout, routes, and integration - the North-South Link.</u>

What is the north-south link?

8.6 A route through the Site for pedestrians and cyclists is proposed, leading from the Northern Station Entrance Square to the River Thames (the 'North-South link'). The link forms a section of a longer link extending from the Town Centre through the Rail Station to Christchurch Meadow and Caversham.

Policy

8.7 The National Design Guide (para. 80) emphasises a clear layout and hierarchy of streets and other routes helps people find their way around so that journeys are easier to make.

8.8 Policy and guidance are clear that the Appeal Site's link should be direct and legible (LP CC7, CR3, CR11 v, Figure 5.1).

8.9 Local Plan Policy contains several design principles for the North-South Link. LP Policy CR11 for the Station/River Major Opportunity Area states:

- Development should help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. (CR11ii)
- North-south links through the area centred on the new station, including across the IDR, are particularly important. (CR11ii)
- Development should Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;" (CR11v)
- Demonstrate that it is a part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling this Policy's aspirations and contributes to the provision of policy requirements that benefit the whole area, such as open space; (CR11 viii).

8.10 The site forms part of sub-area CR11e where policy requires explicitly that:

"A high-quality route incorporating a green link should be provided through to the Thames".

8.11 LP paragraph 5.4.6 emphasises the strategic importance of the link:

"In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre. If visual links are also provided, this will help change the perception of the area north of the station as a separate entity." (LP paragraph 5.4.6)

8.12 The importance of north-south links through the town centre, of which this site is a central component north of the station, is evident in the strategy for central Reading. Among the key principles referenced in 5.2.1 are:

"f. Access to the centre by foot, cycle and public transport will be improved."
"g. Access within the centre by foot and cycle will be improved and barriers to this improved access will be overcome, particularly in a north-south direction through the core."

8.13 Paragraph 5.2.3 develops this further, identifying the need to overcome barriers to movement, particularly a need to emphasise a north-south link through the centre, linking to the Thames and adjacent parks, and Caversham. Figure 5.1 shows the strategy and offers a clear, strategic north-south improved pedestrian and cycle movement north/south and east/west through the CR11e site allocation.

8.14 The link is strategic and is essential to the broader strategy for the area. It is the main priority for this site (LP CR11 ii, Figures 5.1, 5.2). It is, therefore, central to the success of the Local Plan as a whole, the Reading Central Area, the Station/ Riverside Area and the Riverside allocated site (CR11g). 1. 2

8.15 The aim of policy and guidance is not simply that the link improves upon the current situation. Any link whatsoever would represent an improvement. Paragraph 5.4.6 of the Local Plan states: Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management (my emphasis).

8.16 The RSAF recognises the importance of north-south connections from the outset of the document. Paragraph 2.18 recognises this as one of the key challenges: *"The major barriers to pedestrian movement include the rail tracks and the limited number of rail crossings, the Station Hill site, the large retail and post office sheds to the north of the tracks, the significant level differences across the area, and the enclosed electricity board site which blocks direct access from the Station to the riverside footpath and cycle way."*

8.17 This is further emphasised within the principles section, in paragraph 3.6: *"The redevelopment of large sites provides the opportunity to secure landscaped public space and to extend public access. The layout of these will incorporate east-west and north-south routes to enhance movement and linkages across the area, whilst the construction of a pedestrian/cycle bridge linking the Area to Christchurch Meadows will further integrate and ensure good accessibility to adjoining open spaces."*

8.18 RSAF Paragraph 5.6 (and Figure 5.1) identifies the Kennet-Thames spine - 'a major city spine' (para 5.9) as one of the public realm priorities. It is 'the most significant movement corridor in the RCAAP' and 'vital to the success of development in this area'. RSAF Figure 8.5, the Framework Structure, shows the North-South link as the only 'major path/pedestrian link' with a direct link across the Appeal Site between two public spaces or important intersections at either end of the site.

8.19 RSAF emphasises the strategic nature of the route (RSAF paras 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.5, 8.6) and the link thought the Appeal Site should be direct and legible (RSAF paras 5.9, 7.10, Figures 5.5, 8.5. 8.6).

The Proposals

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1 Local Plan CC6, CC7
2 Local Plan – policies CR11 ii, CR11e and g, paragraphs 5.2.1, 5.2.3, 5.4.6, Figures 5.1, 5.2; Reading Station Area Framework – paragraphs 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.2, 8.6

8.20 The submitted Parameter Plans (for approval at outline stage) define a maximum 23m wider corridor travelling between proposed Plots C and D. The North-South Link will travel from the Station Square (North) through the Application Site, across Vastern Road and the SSE site to the River.

8.21 The proposed alignment and width broadly follow Local Plan and RSAF guidance. This would generally be sufficient to provide the movement corridor and achieve the necessary quality of public realm and green link - provided the remainder of the link to be delivered across the SSE site also accords with the Local Plan and RSAF.

8.22 Should development of the SSE site not proceed according to Local Plan and RSAF guidance, then the direct route with a direct line of sight may be compromised.

8.23 The current application can only be supported on the basis the direct north-south link can be provided from the Station Square to the River, notwithstanding this requires coordination between land interests (as the RSAF requires). The strategic significance of the north-south link is such that it must be secured at this outline application stage, taking account of several scenarios for the development of the SSE site.

8.24 Unless and until the SSE site is redeveloped, the link through the Application Site must offer good connections to the existing secondary routes to the River via Lynmouth Road and Norman Place. The Application supports the current position with a link between Plots B and C aligned with Lynmouth Road, and a connection through the Northern Station Interchange to the east of Plot D, in addition to the main link between Plots C and D.

8.25 The Council refused 55 Vastern Road to the north at Planning committee on 9th April 2021. The decision was appealed and held via Inquiry while revised information was received for this application during October 2021. The Council's position is that the appeal for 55 Vastern Road (the western part of the SSE site) should be dismissed. Should this be upheld, the north-south link across the SSE site as indicated in the RSAF could be expected to proceed, and the Application Scheme and Parameter Plans allow for the creation of such a route alignment. However, the evidence presented to the Inquiry is that the eastern part of the SSE site may never be redeveloped- because the site is needed for electricity supply in the long term. In this case, the configuration of a direct link with a direct line of sight will require an amended scheme for the 55 Vastern Road site and a mutual adjustment of the alignment across the Application Site. This requires significant amendments to the Parameter Plans and cascading changes through the DAS, the illustrative proposals, and the design code. The Parameter Plans as currently drawn- and for approval at this outline stage- do not account for the necessary realignment of the link across the 55 Vastern Road site and adjustments to the proposed development plots C and D.

8.26 The Council may need to reconsider its position if the 55 Vastern Road appeal is allowed.

Summary

8.27 The overall success of the north/south spine from the Town Centre to the River is dependent upon each section or link playing its full part, including the connection through the application site. This route should be direct, with a direct line of sight

between the station square (north) and the River Thames. The proposed link is not fully fit for purpose because it does not allow for the route alignment to vary in response to the final form of the development of the SSE site to the north (CR11g). The potential future alignments can be successfully accommodated within the confines of the site boundary but not within the Parameter Plans as currently drafted.

8.28 Whilst the Application offers a minimum 23m wide corridor through the site between Plots C and D and the alignment and dimension broadly accord with the RSAF, there remains a significant impediment in that the route requires coordination between the application site and the adjoining allocated SSE site.

Figure 8: Illustrative concept scheme looking north from North Station Entrance with SSE site in background.

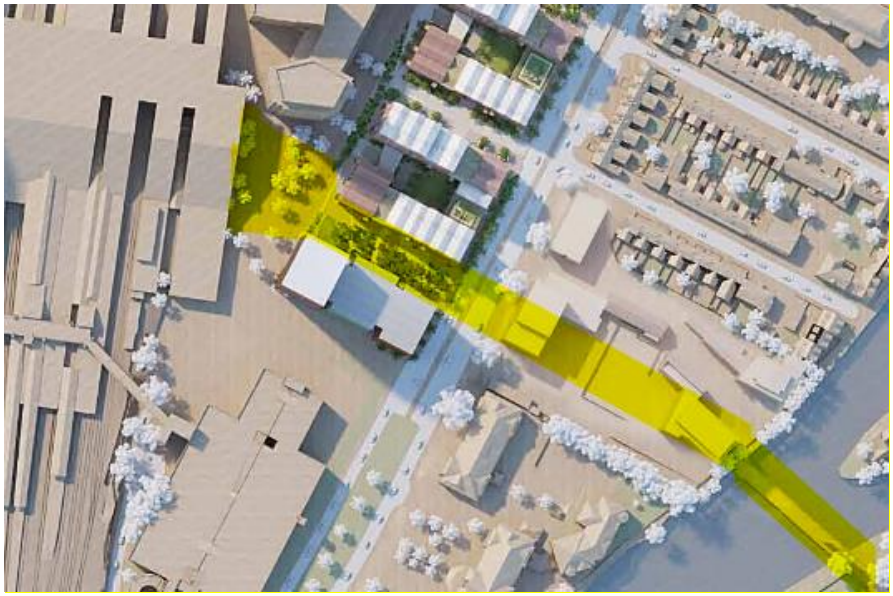

Figure 9: Illustrative concept scheme model with highlighted route from North Station square to Christchurch Bridge through SSE site.

8.29 The LPA recognises that the Parameter Plans broadly follow the orientation shown on diagrams in the RSAF and local plan. However, it does not, and possibly cannot take account of the future development of the CR1g site. This would, in turn, lead to a heavily compromised north-south route through the area, which would fundamentally conflict with one of the overarching movement priorities.

8.30 Therefore, the development as proposed may prevent the achievement of the high-quality north-south pedestrian and cycle link: This is an essential requirement of policy for this area, through a failure to provide a satisfactory alignment for the connection through the site such as that this compromises the route.

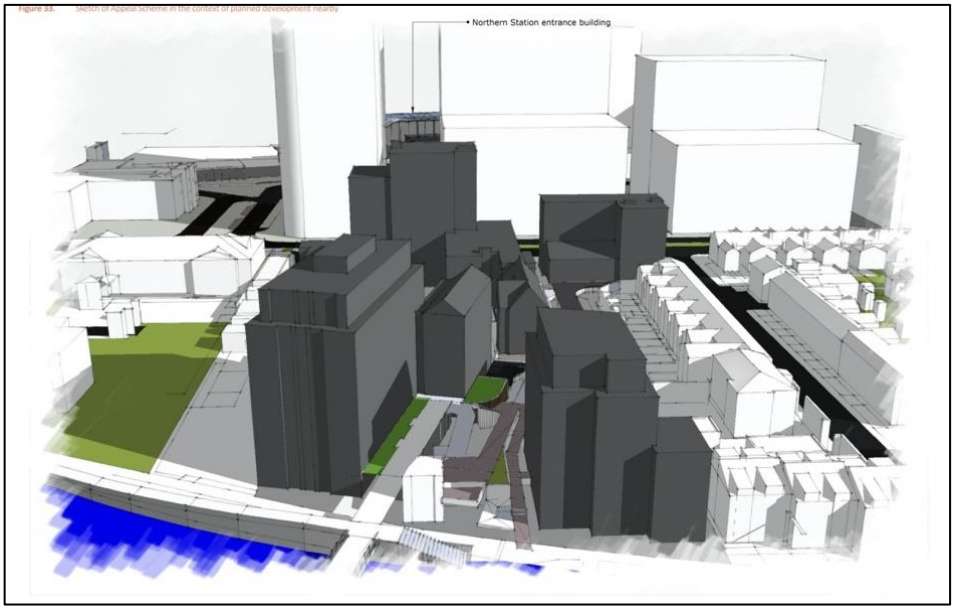

Figure 10: Outline model of the proposed SSE Appeal Scheme amended with Aviva layout (as originally submitted) showing how the North-South Route is indirect with no direct line of sight from the Station to the River

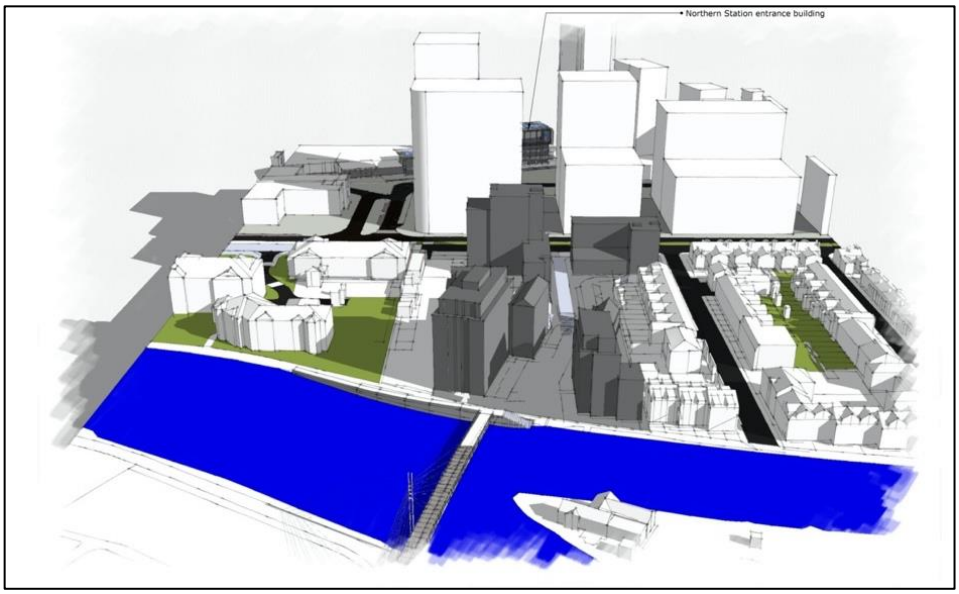

Figure 11: Sketch of an amended version of the SSE Appeal Scheme with Aviva layout (in the background) also amended so that together they provide a direct route and direct line of sight.

Height, scale, and massing

8.31 The proposed development has scale as a Reserved Matter. However, the Parameter Plans to be approved at this outline stage propose development plot dimensions, the maximum buildings heights for each plot (or part thereof) and the minimum distances between plots. Therefore, the Council must consider whether it is appropriate for development to rise to these heights on the parcels proposed.

Figure 12: Parameter Plan PP-102 P2

Policy

8.32 The National Design Guide requires that development should: Understand and relate well to the Site, its local context and broader context (C1); adopt a compact urban form (B1), propose appropriate building types and forms (B2); respond to existing local character and identity (I1) and well-designed, high quality and attractive places and buildings (I2).

8.33 Relevant Local Plan Policies relating to the scale, height and mass of development are CC7 Design and the Public Realm, EN1 (Historic Environment), EN5 contrary (protection of Significant Views with heritage Interest), EN6 (New Development in a Historic Context), CR2 (Design in Central Reading), CR10 (Tall Buildings), and CR11 (Station/River Major Opportunity Area).

8.34 In Policy CR10 'Tall Buildings', tall buildings are defined as 10 commercial storeys or 12 residential storeys equating to 36 meters tall. Policy CR10 sets clear guidance on tall buildings in Reading and only allows them in the 'areas of potential for tall buildings' defined in the policy and on the Proposals Map.

8.35 The policy points to several tall buildings clustered around the station (to the north and south), signifying the station area as a major destination and gateway to Reading. The application site is located within area CR10a: Station Area Cluster. The specific policy for this area is clear that the station should be at the heart of a cluster

of tall buildings to *"signify the status of the station area as a major mixed-use destination and the main gateway to, and most accessible part of, Reading"*.

8.36 Policy CR10 is clear that the tallest buildings should be close to the station and step down in height from that point toward the lower buildings at the fringes. The policy also requires the creation of a "*coherent, attractive and sustainable cluster of buildings with a high-quality public realm*". This cluster extends south beyond the CR11E site allocation to include Station Hill south of the railway. Another key policy requirement of CR10a is that proposals are to "*Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms*".

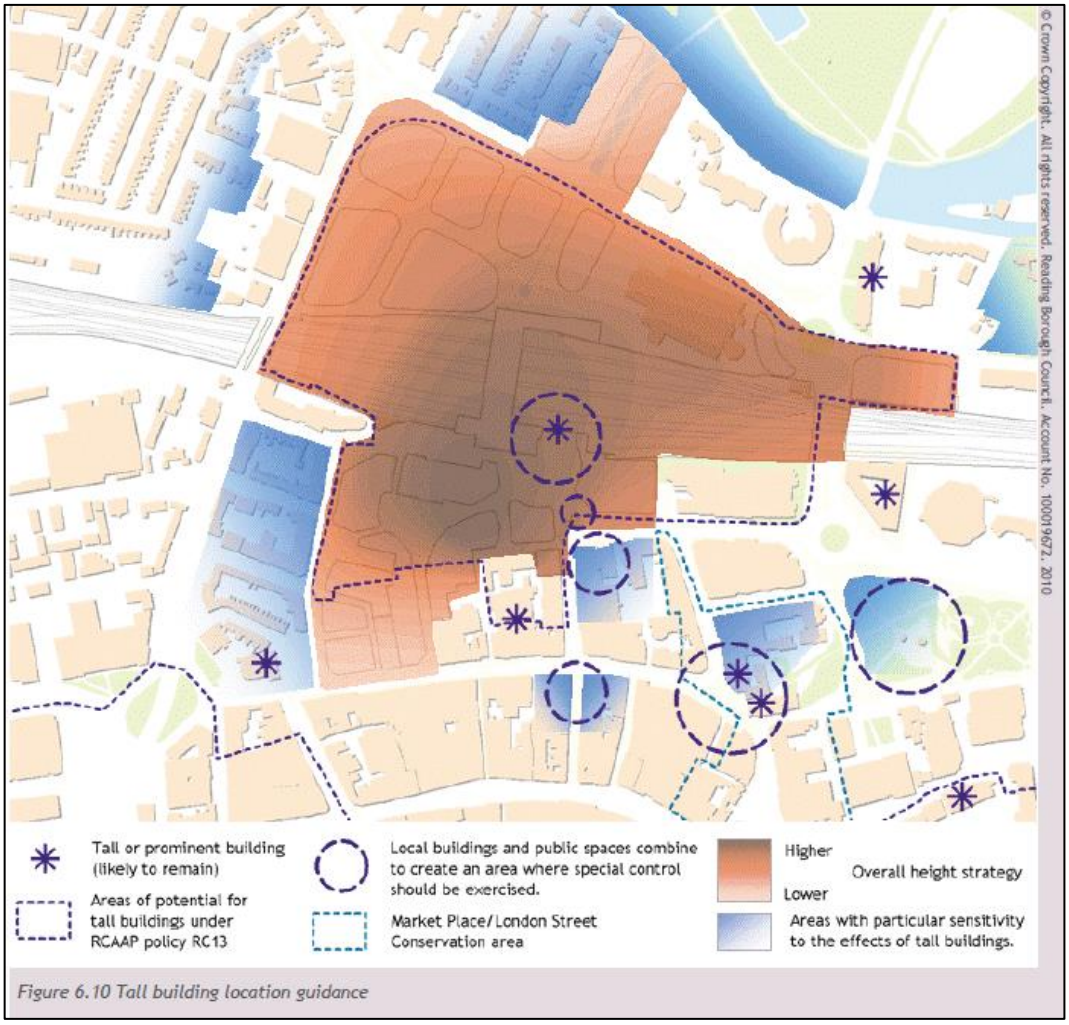

Fig 13 – Tall building location guidance.

8.37 The RSAF proposes a three-fold approach to density, height, and mass. This includes clear height and massing principles. In summary, development should:

- Building heights should have regard for the buildings and areas of architectural and historic interest and important views and prospects (RSAF 6.27 and 6.33)).
- A general dome or blister pattern (RSAF Figure 6.26). The consequence is that height across the Application Site must decline from east to west **and** south to north.

- Benchmark heights are not guaranteed. They may be modified upwards or downwards and should grade back to the established heights in surrounding areas (RSAF 6.23- 6.25).
- Local Plan Figure 5.2 provides a diagrammatic representation of the approach to tall buildings showing rising heights towards the centre, distinct buildings with varying silhouettes and clear gaps between.
- Enhance the skyline through distinctive profiles and careful design of buildings' upper and middle sections (C10v first bullet).
- Avoid bulky, over-dominant massing (CR11v fifth bullet).

8.38 The RSAF sets out 'benchmark heights' for individual development plots as well as massing principles, including the formation of a 'dome' of taller development around the station reducing in height to the north and west away from the northern station entrance and safeguarding the setting of sensitive buildings and areas.

8.39 The RSAF describes the potential locations of 'landmark buildings' are indicated which may be permitted to rise higher than the benchmark heights. The tallest landmark buildings known as 'district landmarks' to the south of the station and lower 'local landmarks' to the north of the station clustered around the Station Square (North).

8.40 The RSAF proposes clear guidance on tall and landmark buildings. In summary, development should:

- Promote high-density development (RSAF 6.11).
- Tall buildings rise around the Station 'nexus' (RSAF 6.12).
- A dramatic cluster of taller buildings forming a distinctive skyline (RSAF 6.13)
- Buildings of the greatest permissible heights form a 'Crown' to the immediate south of the Station (RSAF 6.14).
- The Framework does not necessarily advocate tall buildings across the Area (RSAF 6.28).
- Landmarks may exceptionally 'puncture' benchmark heights to emphasise important places.

Assessment

8.41 It is generally accepted that policy and guidance encourage high-density development on the Application Site. This is, however, conditional on accordance with other areas of policy and guidance.

8.42 Officers' concerns relate to several areas set out under the headings below.

8.43 The analysis in the table below demonstrates that the proposals exceed the Benchmark heights in all cases and that the locations of 'landmark' buildings do not accord with RSAF guidance.

Height										
Parameter Plan Plot	**RSAF Parcel**	**Plot Area (sq. m)**	**Parameter Plan PP103 Sub Plots**	**Sub Plot Area (sq. m)**	**Proportion of Plot Area (%)**	**Parameter Plan PP103 Maximum Sub Plot Heights (AOD)**	**Equivalent Residential Storeys (35m/12)***	**Equivalent Commercial Storeys (35m/10)***	**RSAF Landmark**	**At, or Exceeds RSAF Tall Buildings Threshold (35m**
A	N3	2,271	A (North)	1,563	69	71.1	11	6	None	NO
			A (South)	708	31	94.4	19			YES
B	N4	3504	B (North West)	519	15	64.45	9	7	None	NO
			B (South West)	827	24	92.8	19			YES
			B (East)	2158	62	55.1	6			YES
C	N5	3378	C (North and East)	2260	67	79.1	14	8	Local	YES
			C (South West)	1118	33	94.4	19			YES
D	N6	2144	D (North)	405	19	87.9	17	10	Local	YES
			D (South)	1739	81	112.9	26			YES
	Totals	11,297		11,297						

Fig 14: Plot Heights and compliance with RSAF Tall Buildings Threshold

8.44 The proposed development has scale as a Reserved Matter, however maximum heights for each building on each plot are proposed as fixed development parameters. Generally, a series of maximum heights is indicated within drawing PP-103 P2 of the proposed parameter plans. The tallest parts of each plot are located to the southern or southwestern most part of each of the four blocks.

8.45 It must be assumed that any outline consent granted will permit the maximum height parameter to be exercised. Therefore, a key consideration is whether the resulting built form can effectively transition between the development and low-rise residential areas to the north across Vastern Road and the urban design requirement of allowing sufficient daylight penetration into the centre of the perimeter blocks. This means that the illustrated scheme represents the actual extent of massing that is likely to come forward.

8.46 Officers have a range of concerns in relation to the proposed height and massing of individual plots.

Plot A

8.47 Regarding how it relates to the surrounding built environment, one of the most sensitive parts of the development is the northern parts of Plots A, B and C fronting onto Vastern Road and the western side of Plot A fronting onto Caversham Road. Policy and guidance indicate height and mass should decline to the west and north of the station with no landmark buildings proposed by the RSAF on Plots A or B.

8.48 On Plot A, the proposed maximum benchmark height is 71.1m AOD, including a building above the tall building threshold, whereas plot B, further east and south, is 55-64m AOD. This inverse relationship would set a contrary benchmark height that rises to the northern and western peripheries of the plan area rather than decreasing as planned for by the RSAF. This will fail to provide an effective transition between the proposed development and low-rise residential areas to the north across Vastern and Caversham Road.

8.49 Existing buildings on the opposite site Vastern and Caversham Road, opposite Plot A are, in the main, two storeys in height, or equivalent (for instance, the traditional terrace parade of retail units) but increase in height to the 4-storey commercial scale of Great Brighams Mead opposite the Caversham Road roundabout. The height of the proposed buildings (ranging from 11 to 19 residential storeys) will exceed, by a considerable margin, the buildings on the opposite side of Caversham Road.

8.50 It must be recognised Caversham Road is wide and forms an important part of the IDR, and provides a significant man-made barrier between the application site and these existing properties to the west. THEREFORE, the IDR creates a strong physical and visual break between the proposed height and massing of these plots and the inherent differentiation in character that the proposed development will create. However, the proposed relationship is far from harmonious. The lack of transition as required by the RSAF on Plot A results in a very stark transition to the proposed development that is disproportionally out of scale with these more historic and low-rise residential areas to the north and west.

Plot B

8.51 Plot B to the centre of the site comprise a regular perimeter block composed of several buildings of varying heights.

8.52 Plot B, which broadly equates to RSAF Parcel N4, has a maximum landmark height of 92.8m AOD (16 commercial or 19 residential storeys) and a benchmark height of 64.45m AOD (8 commercial or 9 residential storeys). Plot B is unique in that it contains three different maximum heights indicated within the parameter plans—the landmark and benchmark heights moderated by a 64.45m AOD section. The RSAF Benchmark height for Parcel N4 is seven storeys. The density guidance is 'Medium-High' (Plot ratio of 200-1000%) with no landmark buildings encouraged. Part of B exceeds the Reading Tall Building Strategy threshold and incudes landmark buildings where none are proposed in the RSAF.

8.53 As described, Plot B partly accords with the benchmark heights identified within the RSAF. However, the western side, particularly the southwest quadrant, exceeds the benchmark by considerable margin incorporates tall and landmark buildings on a plot where the RSAF proposes none.

8.54 The height and massing of plot B do not adhere to the objectives of the RSAF, subject to other considerations.

Plot C

8.55 Plot C, which broadly equates to RSAF Plot N5, the landmark element would have a maximum height of up to 94.4m AOD (16 commercial or 19 residential storeys) and a maximum benchmark element of 79.1m AOD (12 commercial or 14 residential storeys), The RSAF benchmark height for Parcel N5 is eight storeys. The density guidance is 'Medium-High' (Plot ratio of 200-1000%) with Local Landmark buildings permitted. Part of Plot C exceeds with RSAF Benchmark Heights.

8.56 For Plot C, this constitutes a mixture of 14-19 residential storey elements.

8.57 The height and massing of plot C are not considered to adhere to the objectives of the RSAF, subject to other considerations. The benchmark heights rise above the RSAF guidance.

8.58 Plot C is identified as a location for a local landmark. However, the Parameter Plan places the tallest element in the south west quadrant of the plot so that the framing of the Station Square North and views from Station Square South may be affected (see views chapter below).

8.59 As described, Plot C exceeds and conflict with the maximum range benchmark heights identified within the RSAF.

8.60 In terms of maximum landmark heights, Plot C rises to 94.4 AOD. The RSAF does not prescribe specific local landmark storey heights (other than that, they are likely to be permitted to exceed the 36m Tall Buildings threshold). However, it does require that local landmarks are clearly subordinate to the District Landmarks proposed in the vicinity of the Station Hill site to the south of the Station. The proposed landmark will be considerably lower than the Station Hill maximum height by that height measure.

8.61 Nevertheless, local landmarks on Plots C and D must be clearly subordinate and distinguishable from District Landmarks when viewed in the context of District Landmarks. Local Landmarks should not diminish the prominence and visibility of District Landmarks.

8.62 The Townscape and Visual sections of the ES show that the landmark elements of Plot C would be visible from such settings is a concern (and will be covered separately). However, the marked increase in overall height envisaged by the RSAF is somewhat accommodated by the focused position of these landmark elements of block plots within their respective perimeter blocks, and the permitted or planned taller elements of the station area cluster on the adjoining Former RMG Site and the District Landmarks permitted as part of the Station Hill site.

Plot D

8.63 The southern landmark element closest to the North Station Square would have a maximum height of up to 112.9m AOD, and maximum northern shoulder element of 87.9m AOD.

8.64 The illustrative proposals contained within the DAS shows Plot D at 18 commercial storeys (office) broadly equivalent to 22 residential storeys. The building would be split with a lower benchmark level on the northern side which would have a height differential of approximately two-thirds of the height of the taller part of the

building on Plot D, which forms 81% of its envisaged footprint. It is recognised that Plot D would be a substantial building within its immediate and wider setting.

8.65 Plot D broadly equates to RSAF Parcel N6. The Benchmark height for Parcel N6 is defined as *'Likely to be at least 10 storeys'* with a cross-reference to tall buildings policies and design guidance. The density guidance is 'High to very High (Plot ratio of 500-1000% plus) with Local Landmark buildings encouraged. Plot D generally accords with RSAF guidance on density and height. However, this is conditional upon other guidance on tall building policies and guidance.

8.66 The maximum height of Plot D directly opposite the station entrance and next to the highest element of the prosed Former RMG site is considered to generally align with the aspirations of this policy. This pair of buildings would effectively mark the northern extent of the station and act as a prominent gateway structure to the town. Its location also allows Plot D to contribute to the cluster of other tall buildings permitted to the southern side of the Station.

8.67 Plot D height parameters nevertheless present a significant concern.

8.68 Policy CR10 requires (among other relevant principles) that all tall buildings should be of excellent design and architectural quality, offer a distinctive profile and careful design of the building's upper and middle sections, and avoid bulky, over-dominant massing. They should ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and allow buildings to be viewed as individual forms.

8.69 The majority of Plot D is indicated at a maximum landmark height of 112.9 AOD across 81% of the subplot. The Parameter Plans, read alongside the DAS and Design Code, permit and encourage a tall building to rise across 81% of the plot area. This will result in a wide monolithic block of great width and mass lacking a suitably distinctive profile. The mass and width will also cause the towers to merge with adjacent buildings so that they become insufficiently distinct from one another, and crowd views a crowded and overly bulky massing.

8.70 The tall building will cantilever out and oversail the Station Square North and North-South Link at ground level. In this regard, it is unclear how the proposed height and massing would successfully fit into the envisaged urban grain of this part of RSAF and CR11E site allocation.

Conclusions

8.71 The proposed heights contradict RSAF guidance. The three-fold approach to density, height and mass set out in the RSAF has not been followed, and the combined effect of the proposed height, density and mass of the proposed scheme is considered unacceptable.

8.72 The proposals fail to relate positively and appropriately to local character and the context of the Site to the detriment of the visual amenities of the area and fail to deliver a development of the highest quality in relation to its context. The Applicant has not justified these many exceptions to guidance. The illustrative scheme set out in the DAS is insufficiently convincing on these matters to offset the concerns raised. The proposed scope and depth of the Parameter Plans and the Design Code appear insufficient to exercise satisfactory control at the reserve matter stage.

8.73 The northern and western benchmark heights of Plot A, B and C do not suitably reduce in height on the Vastern Road/Caversham Road frontage. They don't relate well to the established heights of existing development to the west, thereby conflicting with the aim of Policy and guidance, which advises that development should carefully consider the interfaces and settings of smaller-scale residential buildings. For Plot C and D, the mass and width -combined with the proposed oversailing of the adjacent public realm of Plot D- are likely to result in overly bulky buildings, eroding the visual gaps in between. Therefore, it is unclear how the proposed height and massing of Plots C and D will successfully fit into the envisaged urban grain of this part of the RSAF area and the CR11E site allocation.

8.74 In summary, the proposed heights of the development contradict RSAF guidance, and the three-fold approach to density, height and mass set out in the RSAF has not been followed. It is therefore concluded that the combined effect of the proposed height, density and mass of the proposed scheme is unacceptable. The reasons for any exceptions to this policy approach have not been fully justified, whilst the Illustrative Scheme (DAS Chapter 6) raises significant concerns that the development in accordance with the Framework and Design Code will result in harm.

8.75 As such, the proposals fail to relate positively and appropriately to local character and the context of the site to the detriment of the visual amenities of the area and fail to deliver a development of the highest quality in relation to its context. It is therefore considered appropriate this forms a reason for refusal due to the combination of the proposed height, mass, and proximity of development within Plots A and D will harm the setting and character of the Station/River MOA contrary to Policies CR2, CR3, CC7, CR10(a), CR11 and CR11e, the RSAF and National Design Guide.

<u>Townscape/Views</u>

8.76 Policy and guidance place expectations on all developments to achieve a high standard of design that responds to local character; enhances the public realm; includes the highest quality architecture that defines the area, and; positively contributes to the streetscape and cityscape.

8.77 The proposed development will affect the setting of Station Square South, the surrounding buildings, and the views from and across the Square towards the development.

Policy

8.78 The National Design Guide require that development understand and relate well to the Site, its local context and wider context(C1); proposes appropriate building types and forms (B2); responds to existing local character and identity (I1) and; offers well-designed, high quality and attractive places and buildings (I2).

8.79 Local Plan Policies CC7 Design and the Public Realm, EN1 (Historic Environment), EN5 contrary (protection of Significant Views with heritage Interest) EN6 (New Development in a Historic Context), CR2 (Design in Central Reading), CR10(a) and (V), CR11 (Station/River Major Opportunity Area).

8.80 Policy CR10 requires that all tall buildings "should be of excellent design and architectural quality, and should:

"Enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building; …

Contribute to high-quality views from distance, views from middle-distance and local views; …

Avoid bulky, over-dominant massing…"

8.81 Policy CR10a specifically requires tall buildings in the Station Area Cluster to:

" Follow a pattern of the tallest buildings at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes;

Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm;

Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms;…"

8.82 Paragraphs 5.3.42 to 5.3.44 of the Local Plan supporting text advises that:

"From longer distances, the overall massing and proportion is most important, and the relationship between the silhouette and the skyline should inform the design. In the case of mid-distance views, the overall composition and detail are perceived in balance, and the hierarchy and articulation of elevations are particularly important. Finally, for local views, the interrelationship of the building's base and the immediate setting will be particularly visible, and the quality of materials and the detailing will be critical.

The contribution that tall buildings can make to views in terms of their locations should also be taken into account. Aligning tall buildings to terminate or frame views can create a strong reference point, allowing greater urban legibility.

There are some key panoramic views of the central area that tall buildings should make a positive contribution to. These include the views of the central area from Balmore Park, Caversham Park, Kings Meadow, Reading Bridge, and from Oxford Road to the west of the centre, the Whitley Street area to the south and Wokingham Road to the east."

8.83 Policy EN5 introduces a new policy requirement regarding views with heritage interest. Views are specifically defined (Fig 4.2 of the Local Plan - Significant Views with Heritage Interest), and these do not appear to be immediately affected by these proposals at short or medium range views. The policy can be applied more widely to other views with heritage interest. This will be addressed under the wider townscape assessment within this report.

8.84 Chapter 7 of the RSAF is entirely focused on 'Views' and provides a set of 61 short, medium and long-range views that need to be considered. As described, the submitted ES includes a Heritage Townscape and Visual Impact Assessment, which assessed the effects on townscape character and views. This is based on 'wireline diagrams' of the maximum parameters viewed from various key vantage points.

Assessment

8.85 The submitted Environmental Statement (ES) assesses the townscape and visual impacts of the development at its maximum height. Verified images of the development, as seen from sensitive locations around the town, have been provided.

8.86 At the maximum Parameter Plan heights, the landmark elements of all plots would contain tall elements, which would undoubtedly be prominent structures that would be seen in short, medium and (in some cases) long-range views. The Townscape and Visual sections of the ES and the wireframe images show that the buildings, where seen, would be viewed clearly in the context of the central area of town and against other tall buildings in the town centre that existed at the time the assessment was done. It should also be recognised that the massing of the proposal is likely to be ameliorated further by the recently constructed Thames Quarter development, only shown partially constructed, and undertaken without the modelling of the approved substantial Station Hill development to the south of the Station (maximum height of 163m AOD).

8.87 Whilst not determined at the time of writing, the planned height of Plot A on the RMG Site (also within the CR11E allocation), is also a material consideration. So too is the fact that any proposals on the CR11e allocation are likely to be further framed visually should the appeal on the adjoining Former SSE site (CR11g allocation) be allowed and be implemented in the form proposed under that application. As such, there remains a significant degree of uncertainty as to how successfully the proposed buildings would contribute to the massing of structures that define the centre of Reading and would appear consistent with the envisaged scale of the CR10a, tall buildings Station Area Cluster.

8.88 Whilst the application site itself does not contain any heritage assets, 'Heritage' has been included in the design section of this report given the envisaged maximum scale of the proposals means that they will undoubtedly affect the setting of a wide range of heritage assets at short, medium, and potentially long-range views.

8.89 It must first be recognised that the scale envisaged within the Tall Buildings policy CR10 and the RSAF will be highly visible and unlikely to be hidden by any existing natural or future, or manmade feature. Paragraph 6.13 of the RSAF inherently recognises this in that *"The approach to building massing should be dramatic, with a new cluster of taller buildings forming a new and distinctive skyline for the Station Area as a centrepiece of the centre"*. Therefore, it is unsurprising that the wireline drawings show the new structures having a strong prominence within most views within the town centre and from further afield from the higher ground within and surrounding the town.

8.90 The proposed development will undoubtedly affect the setting of South Station Square, the surrounding buildings, and the views from and across the square towards the development.

Shorter-distance Views

8.91 RSAF (para 7.8) defines several important views that will be affected by the proposed development. These include View 58 (Station Road).

8.92 The proposed development on the Application Site Plots C and D exceeds the Tall Building Threshold and will rise into View 58 (ES Technical Appendix 1a -Townscape and Visual View 10 and 25).

8.93 RSAF Figure 6.10 (Tall Building Location Guidance) defines several 'Sensitive Receptors' (Para. 6.32 - 'areas which might be harmed by high-density development') that impose constraints upon the potential height, mass, and density of development.

8.94 Four areas are marked as 'Local buildings and public spaces combine to create an area where special control should be exercise', centred upon four listed buildings or structures (The historic southern station entrance building and forecourt, The statue of King Edward on Station Road, The Malmaison Hotel, and buildings at the junction of Queen Victoria Street with Friar Street). RSAF para. 6.33 confirms new buildings will be expected to contribute to the area positively. They should conserve and, where appropriate, enhance the character or appearance of Conservation Areas and conserve the setting of listed buildings.

8.95 The RSAF is crystal clear that development must conserve and enhance and not harm the setting of the listed buildings and public spaces identified. The Station Square South and historic grade II listed southern station entrance building are of paramount concern. The RSAF 'places the building and the centre of the strategy for the area (RSAF para. 12.6). The Framework concedes the setting will be altered by the station redevelopment (now complete) and the relationship with surrounding development.

8.96 The station redevelopment scheme pays regard to the setting of the historic station entrance. This is neatly summarised in a sketch from the design statement emphasising that the 1980's station concourse and new station entrance are set back to protect the setting of the historic station building and clock tower. The entire new station entrance and over bridge are shifted to the west to safeguard the setting and to protect the view of the station click tower against the sky.

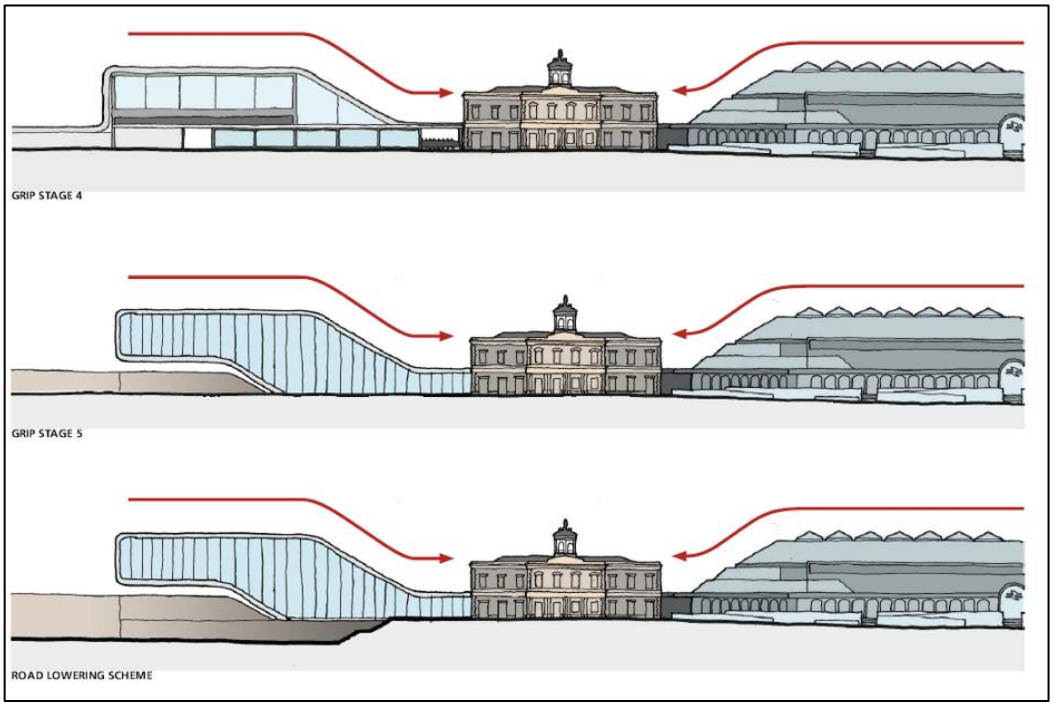

Figure 15: Extract from Pre-Application Report. Grimshaw May 2010.

8.97 The RSAF included an illustrative scheme derived from the document's general guidance based upon a 3D digital model. The equivalent View 58 showing redevelopment of plots to the north of the station demonstrates how the RSAF framework guidelines and the RTBS guidance has been applied.

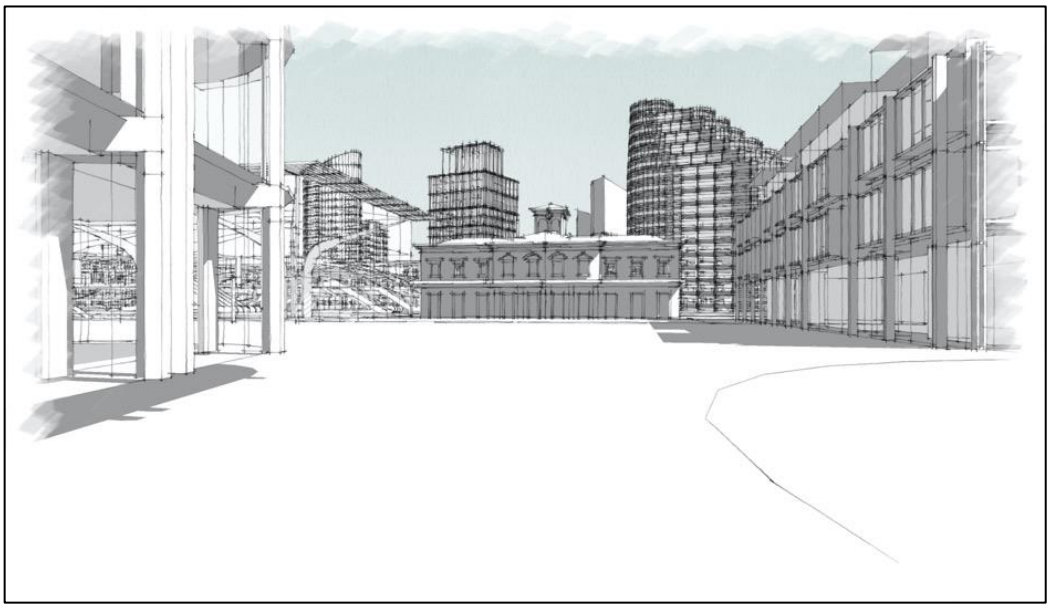

Figure 16: Extract from RSAF Illustrative Framework showing framing of Station Clock Tower (basic digital model- not published image)

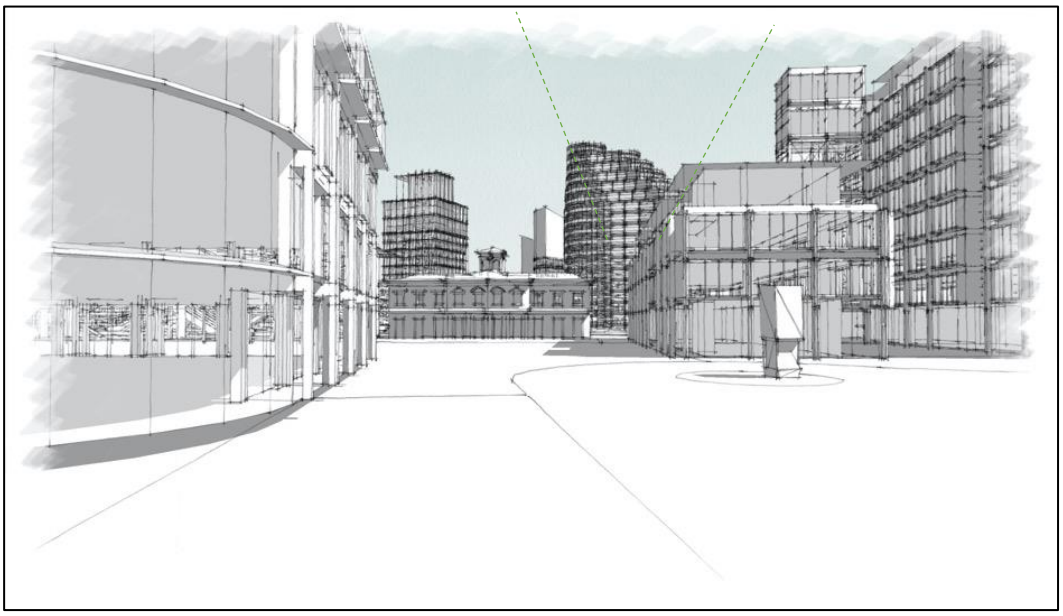

Figure 17: Extract from RSAF Illustrative Framework model showing framing of Station Clock Tower (basic digital model- unpublished image)

8.98 The figures above demonstrate how both the massing of the new rail station buildings and the RSAF Framework illustrative scheme accord with RSAF and RTBS guidance (enhancing Reading's skyline, setting back upper storeys, contributing to high-quality views, taking account of the context including the historic setting, avoiding bulky dominant massing and detrimental impacts on conservation areas, listed buildings and the existing public realm).

Figure 18: View 58 Station Road ('View 10' Extract from EA Technical Appendix 1a - Townscape and Visual)

Figure 19: View north from Station Square ('View 25' Extract from EA Technical Appendix 1a -Townscape and Visual).

8.99 The height, scale, and mass of the proposed development (Block D) would cause harm to RSAF Shorter distance view 58 (Station Road), the setting of Station Square South and the listed buildings and structures within and around it (including the Southern Station Entrance).

8.100 The impact of the development described in the submitted Framework Plans (and for approval at the outline stage) conflicts with the RSAF and the specific design principles RTBS guidance (Para 6.3) Local Plan CR10.

8.101 In respect of the proposals will:

- The view along Station Road towards the Station Square and its Clock tower is of strategic importance to the town's image.
- The proposals will harm this high-quality view and detract from Reading's skyline by crowding views of the Station Clock Tower with detrimental impacts upon the existing public realm.
- Offer bulky and overly dominant massing with few visible gaps between buildings and a failure to offer a sympathetic composition of tall budlings gathered around views of the Station and clock tower.
- The upper storeys will be bulky with no setbacks or modelling of the building silhouette (and few controls offered in the Design Code to limit this).

8.102 The submitted ES (View 25) fails to appreciate the view's significance, mistakenly claims the view is not recognised in the RSAF and overlooks the height and massing controls in Chapter 6 that specifically reference the areas of special control over tall buildings in Figure 6.1. As a result, the ES fails to properly assess the scale of harm the development at its maximum height limits will cause.

Heritage

Policy

8.103 The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2021, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2021, Annex 2: Glossary).

8.104 The NPPF identifies heritage assets as: "*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*"

8.105 The NPPF defines the setting of a heritage asset as: *"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."*

8.106 The NPPF (paragraph 194) requires that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

8.107 Significance is defined by the NPPF as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting"*. (DCLG et al, 2021, Glossary). The NPPF details the main policies regarding heritage assets in Section 16, Conserving and enhancing the historic environment (DCLG et al, 2021).

8.108 Paragraph 202 of the NPPF states "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"*.

8.109 Paragraph 203 of the NPPF states *"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.

8.110 The PPG states under *"Why is 'significance' important in decision-taking?"* (Para 007) that *"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."*

8.111 Under the discussion of *"How can the possibility of harm to a heritage asset be assessed?" (par 018) the PPG offers: "What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting"*.

8.112 In terms of local policy context, the Local Plan 2019 includes the following vision:

6. Maintain and enhance the historic, built and natural environment of the Borough through investment and high-quality design, and capitalise on these assets to contribute to quality of life and economic success;

8.113 Policy EN1: Protection and Enhancement of the Historic Environment requires that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. Policy EN1 expects all proposals to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

8.114 Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

8.115 Policy EN4: Locally Important Heritage Assets states that proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Policy EN5: Protection of Significant

Views with Heritage Interest requires that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. The identified 9 views which merit special protection. However, the explanatory text states: *"This list is not comprehensive, but aims to include the most significant heritage views in the Borough that are not protected by other policies, for instance within a Conservation Area. There are a number of other views in the Borough that are important for other reasons, and these are covered by other designations and documents. ... There are also a number of views of central Reading, in particular including the station area*".

8.116 Policy EN6: New Development in a Historic Context requires that in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, Policy EN6 lists a number of factors which will be taken into consideration.

8.117 In term of the RSAF, this specifically identifies the requirements for historic features and areas of historic importance and other elements of the historic environment, including their settings will be protected and where appropriate enhanced. Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located.

The Proposals

8.118 The proposals have been accompanied by a Heritage Statement (Baseline Study). This sets out to identify those heritage assets which may be affected by the proposals and explore their significance and the contribution that their setting makes to this. The study area is set at 500m from the site and nothing beyond this radius is considered. In relation to the heritage assets within this study area, the document does not explain why particular assets have been scoped out and the discussion of significance is largely descriptive, touching lightly on the subject of significance. There is no discussion of the role that the site currently plays or could potentially play in the setting of the assets selected for assessment. In this sense the document does not fully meet the requirements of paragraph 194 of the NPPF which requires applicants "to describe the significance of any heritage assets affected, including any contribution made by their setting".

8.119 The discussion of the impact of the proposals is found in Volume 2, Chapter 2a of the Environmental Statement. This document is an update of the report which accompanied the original application. Notwithstanding any shortcomings of the Baseline Study, it concludes that there are no significant effects (in EA terms). However, this is not the same as concluding that there is no harm to significance which is the key question to be addressed in terms of the NPPF and Policy EN1. The report concludes that there is a degree of harm (albeit in many cases only to a very small degree) to the following heritage assets.

- 55 Vastern Road (locally listed)
- Former Town Council Chamber (Grade II* Listed)
- Main building of Reading General Station (Grade II Listed)

- Regent Place (Grade II Listed)
- 29 and 31 Caversham Road (Grade II Listed)
- Great Western House (Grade II Listed)
- 13 and 15 Station Road (Grade II Listed)
- Statue of King Edward VII (Grade II Listed)
- Reading Museum (Grade II Listed)
- Former School of Art (Grade II Listed)
- Concert Hall (Grade II Listed)
- Market Place Conservation Area

8.120 While the harm identified is, in many cases, considered to be negligible, this is still a degree of less than substantial harm which would require appropriate consideration under paragraph 202 of the NPPF and Policy EN1.

Assessment

8.121 The proposals will create a series of tall buildings between the railway and Vastern Road. The tallest of these will be 112m AOD high (18 storeys) at the east end of the plot. Other parts of the proposals vary in height between 51.5m AOD (4 storeys) and 92.8m AOD (17 storeys). As urban buildings, most of the heritage assets have a tightly defined setting, dominated by their place in the streetscape in the immediate streetscape. As a consequence, many assets even a just a couple of streets away may have no appreciable relationship with the site, even when developed according to the proposals. After careful consideration of the likely visibility of the proposals from a number of locations, the following heritage assets appear most likely to be affected in some way:

- 55 Vastern Road (Locally Listed)
- Main building of Reading General Station (Grade II listed)
- Market Place Conservation Area

8.122 The assessment of the proposals will consider the impact on these assets including a consideration of key views.

55 Vastern Road (locally listed):

8.123 It was built as the entrance lodge gate to the former Reading Electric Supply Co Ltd works in c.1903 to designs by F W Albury, of the Reading architectural practice Albury and Brown. It red brick with sandstone detailing in a free Classical/Queen Anne style. Its street frontage consists of three elements: A doorway to the left, which appears to have led to a first-floor flat; a double height projecting bay window which incorporated an entrance and ground floor; a vehicle entrance (now blocked) with a pair of windows above. It has undergone a number of changes internally and externally such as the loss of its staircase, the blocking of the vehicle entrance and the replacement of all windows with uPVC. Historic England is currently assessing the building for statutory listing. It is a visible marker of the Victorian/Edwardian industrial expansion of Reading north of the railway line and is a pleasantly ornamented element in what has been a largely industrial part of the town.

Fig 20: 55 Vastern Road looking north

8.124 Historically, 55 Vastern Road was surrounded by industrial buildings of a similarly height, looking out across Vastern Road to the railway shunting yard. Its current immediate setting is broadly consistent with this, but the building has comparatively little presence in the streetscape, best appreciated close-up where its refined detailing can be appreciated.

8.125 The proposals represent a major change of scale in the immediate surroundings. The contrast with No. 55 across the road will be marked but, since No. 55 derives little of its value from its setting, this will not affect the appreciation of the building. Its significance will be unaffected.

Fig 21: Aerial View 1946. 55 Vastern Road in the centre.

Main building of Reading General Station (Grade II listed)

8.126 Reading General Station was built in 1865-7 as a replacement for Brunel's Up station (c.1840). It was designed by Michael Lane (Chief Engineer of the Great Western Railway Company) in an Italianate style with buff brick and Bath stone dressings beneath a hipped slate roof. The surviving building (following the 2014 redevelopment of the station) is 10 bays wide and 2 storeys tall with a central lantern tower incorporating a clock. The central four bays project beneath a bracketed cornice and pedimented blocking course. the first-floor windows all have console-bracketed architraves with the central four all receiving segmental or triangular pediments. A cantilevered canopy runs the length of the façade. Internally little survives of the original interior other than some of the principal structural elements.

Fig 22: Main Building of Reading General Station

8.127 The 1860s rebuilding of the station responded to the need for improved facilities and the railways grew ever more popular. There was also pressure from the Reading Corporation about the condition of the original station and a degree of rivalry from the South Eastern Railway Company who had built their own Reading (Southern) Station to the immediate south east in 1849.

8.128 Historically the rebuilding of Reading General Station fits into the consolidation phase of the British Railway network. Earlier phases of development had seen considerable innovation some of which (such as Brunel's single-side stations as here at Reading) were later abandoned. The current station building should be seen as part the maturing of the network and the full incorporation of the railways as an established part of civic life, rather than the disruptive force they had first been. In this regard the new station building was given a far more commanding presence over the station forecourt than its predecessor. This was achieved by the formality and quality of the architecture but also by the use of a vigorous silhouette. The existing clock tower was accompanied by 10 carefully detailed chimneys and a pair of finials either side of the main pediment which gave it the increased presence befitting a key public building.

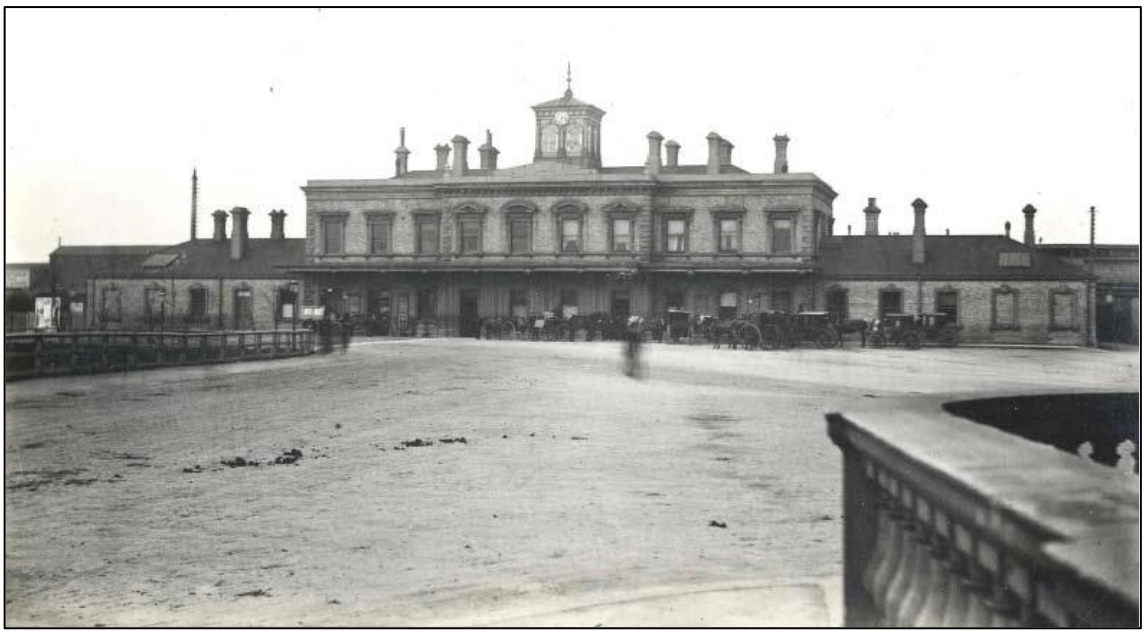

Fig 23: Reading General Station c.1900

8.129 Reading General Station's role as a key public building is both enhanced by and illustrated by its close visual and historic relationship with two other listed buildings:

- Great Western House (Grade II Listed)
- Statue of King Edward VII (Grade II Listed)

Fig 24: King Edward VII Statue and the Great Western Hotel c.1902

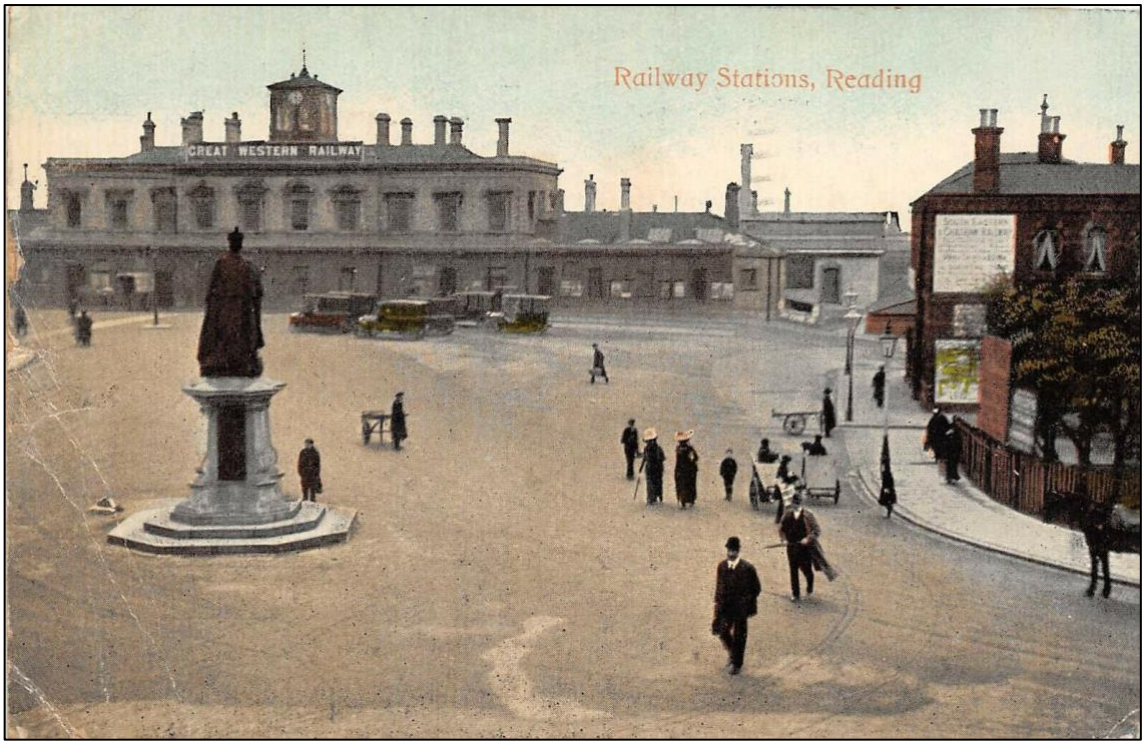

Fig 25: Reading Stations and King Edward VII Statue c.1902. (The viewpoint appears to be a first-floor window in the Great Western Hotel).

8.130 Great Western House was built in 1844 and is thought to be the World's oldest surviving purpose-built Station Hotel. It was built within sight of the original stations constructed a few years before, offering good quality accommodation aimed at train travellers. The Italianate styling of the hotel may have influenced the choice of a similar style for the rebuilding of Reading General Station.

8.131 The statue of Edward VII was erected in 1902, facing Reading General Station, greeting those arriving into the town by train. Reading's statue of Queen Victoria (listed Grade II NHLE 1113483) already occupied a location in front of Town Hall, and the choice of this location is a mark of the civic status accorded the station area. This, in effect, created a new space for civic display defined by the railway buildings and overseen by the monarch which resulted in the station being used for pageantry such as marking VE Day or the 1953 Coronation. Reading General Station, both through its own architecture and its relationship with related listed buildings, plays an important role in this civic space.

Fig 26: Reading General Station decorated for VE Day and the Coronation of Elizabeth II

8.132 Key views of the station are from the South; from the existing station square and looking north up Station Road which frames Reading General Station. The recent redevelopment of the station and the Thames Tower has been carefully designed to ensure that the historic station building, (now the Five Guineas public house) retains its status as the focal point of the public space. In views along Station Road the listed building remains as the terminating building but its impact diminishes the further south along the street; partly because of the comparatively modest scale of the station building and partly because of the busyness of the street which distracts from an appreciation of the station.

8.133 These views are illustrated within the Applicant's TVIA:

Fig 27: Illustrated *views within applicants TVIA*

8.134 In both case the proposal will result in large new buildings appearing in a direct line of sight behind the listing buildings. As set out above, the station's architectural presence is partly derived from its silhouette dominated by the clock tower. Although this has been diminished by the loss of the building's carefully detailed chimneys it remains an important part of the building's appreciation.

8.135 The new buildings in the locations indicated (blocks C and D) will reduce the listed building's prominence harming this aspect of the station's significance as a notable public building. This is an aspect of the building which was important in its design and has been a notable a feature of its history. The changes should therefore be seen as representing a moderate degree of less than substantial harm to the building's significance.

Market Place/London Street Conservation Area

8.136 This Conservation Area has been the subject of an Appraisal completed in 2007. As such it predates the first version of the NPPF (in 2012) and both the current Local Plan and its predecessor. The appraisal itself states that it should be reviewed after 5 years. As a consequence, while the Appraisal contains much valuable information relating to the history and character of the Conservation Area, it is reasonable to revisit the detail of this assessment.

8.137 The applicant's Baseline assessment does not consider any heritage impact beyond 500m from the application site boundary. Defining a limit is not unreasonable but this is not based on a Zone of Theoretical Visibility and no consideration has been given to the potential for impact beyond this arbitrary limit.

8.138 High Bridge (Listed Grade II and Scheduled) is the oldest surviving bridge in Reading on one of the medieval town's principal north-south routes. As one approaches the town centre along London Street the bridge marks a "threshold" as Duke Street narrows to reflect its medieval origins. This change is emphasised by the intrusion of the Inner Distribution Road which divorces most of London Street from the town to the north. From High Bridge Duke Street/High Street winds uphill past Jackson's Corner to the Market Square. The streetscape is a varied one. While it is a medieval streetplan, the buildings are all post-medieval ranging from Cooper's Public House (17th-century and later) to the former Barclays Bank at 3.5 King Street (late 1970s). These later buildings respect the medieval plan and the scale and grain of the town established in the 18th and 19th centuries. A direct line of sight up the street is possible as far as Market Square although St Laurence's Church is obscured. However, the romantic Gothic roofscape of the Former Town Council Chamber (Grade II*) appears over the intervening buildings to indicate the historic core of the town. Overall, this is a picturesque streetscape whose character reflects the long, evolved history of this part of Reading.

Fig 28: View North along Duke Street/High Street

8.139 Rudimentary modelling using Google Earth data and software indicates that Block D of the proposal will appear directly behind the Former Town Council Chamber. This is not a verified view, but the modelling used is consistent with the verified views created for the Townscape and Visual chapter of the Environmental Statement. This view was not modelled in the TVIA since it lies c.150m beyond the 500m radius. While the proposals would not be the only modern building in the view up Duke Street/High Street, it would be the only one which does not reflect the grain and scale of the historic town. Accordingly, it would sit as a jarring element on one the most historic routes into the town. The proposed development will be visible from other parts of the conservation area, particularly from London Street as it rises to the South, but the effect on the narrower streets of the medieval core is more pronounced. From many parts of the conservation area the proposals will not be visible. On this basis the impact on the conservation area should be seen as a low degree of less than substantial harm.

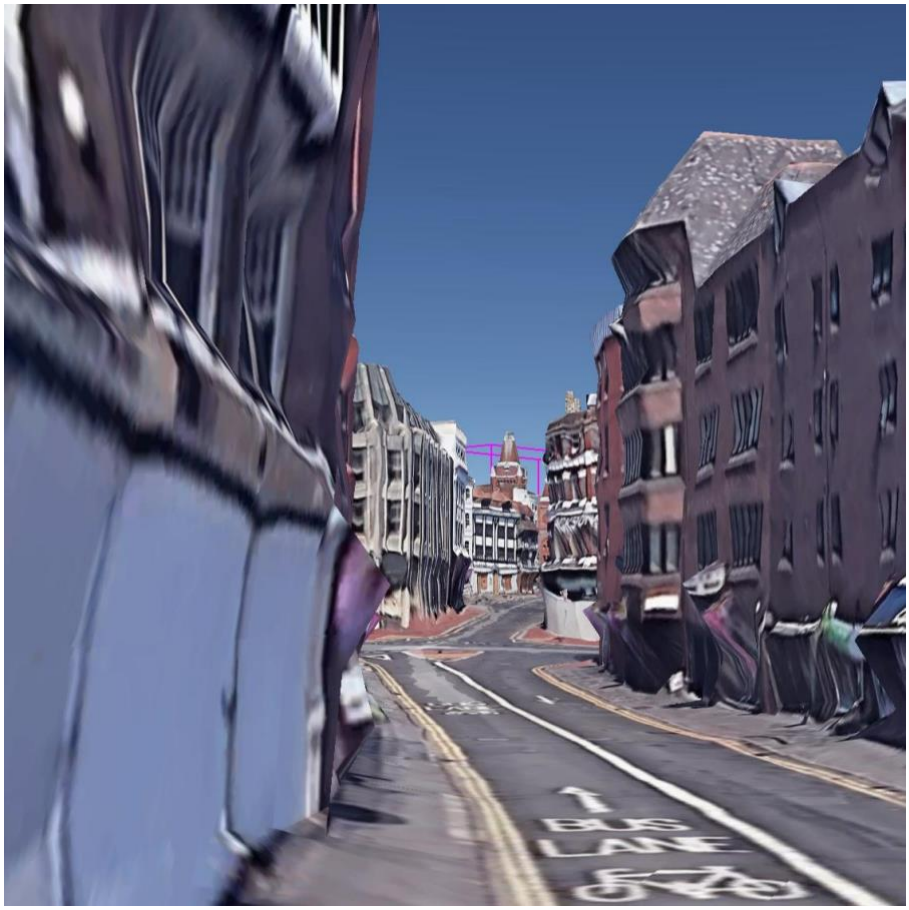

Fig 29: Visualisation of the development looking north along Duke Street/High Street.

8.140 The Former Town Hall Council Chamber was designed by Alfred Waterhouse. The principal tower forms a conspicuous landmark at the end of Friar Street and Blagrave Street. Along with the tower of St Laurences', it dominates Town Hall Square. While the view of the tower from Duke Street contributes to the character of the conservation area, no evidence has been identified that Waterhouse intended this and it is not easy to appreciate the listed building from this location. The heritage sensitivity of this view is best considered in terms of the significance of the conservation area than of the Former Town Hall Council Chamber (or indeed the other 4 listed buildings in this view).

Conclusions

8.141 The cause of harm in both to both the Main Building of Reading General Station and the Market Square/London Street Conservation Area derives from the scale and massing of the proposals and how this affects the appreciation of designated heritage assets. The application site is identified in both the Reading Station Area Framework and the Reading Tall Buildings Strategy as a suitable location for tall buildings. Notwithstanding this, the RSAF requires that proposals have no adverse impact on historic assets and their settings (policy CS33). Similarly, the Reading Tall Buildings Strategy requires that "All tall buildings proposals should … avoid detrimental impacts upon conservation area and listed buildings" (S 6.3 General Principles).

8.142 NPPF: Paragraph 202 requires that *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm*

should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

8.143 In the case of the Main Building of Reading General Station and the Market Place/High Street Conservation Area the proposals will create a degree of less than substantial harm (moderate and low respectively) to their significance. As set out in the applicant's own Heritage Statement, Historic England recommends that where harm is identified, consideration should be given to options that might reduce or mitigate that harm. Even though the applicant's own assessment has concluded a degree of harm to a number of heritage assets no evidence has been provided to indicate that attempts have been made to reduce the harm.

8.144 Great weight should be applied to the harm to designation heritage assets and this balancing exercise is undertaken elsewhere in this report.

8.145 Policy EN1 of the Local Plan is consistent with the NPPF, expecting developments to avoid harm to heritage assets in the first instance and requiring that any harm is justified, often in the form of public benefits. No evidence has been provided to indicate that attempts have been made to reduce the harm. Great weight should be applied to the harm to designation heritage assets and this balancing exercise is undertaken elsewhere in this report.

8.146 Policy EN4 of the local plan requires development to conserver the significance of local important heritage assets. Only one locally listed building, 55 Vastern Road, has the potential to be affected in this manner but it derives little value from its setting and its significance will be preserved.

8.147 Policy EN5 states that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance and is explicit that the list of 9 views itemised in the policy is note exhaustive. It makes particular mention of other views within conservation areas or the station area. The proposals will harm views of the Main Building of Reading General Station and the view up Duke Street/High Street as set out above.

8.148 Policy EN6: This policy is focused on new development in a historic context. The nature of the proposal site is such that this policy becomes relevant largely due to the scale of development: the scale of buildings means that the relevant context is far broader than site and its immediate neighbours. No information has been provided to indicate how the proposals respond positively to the historic environment or how this has informed or shaped the new development. The assessment above has demonstrated that the proposals do not make a positive contribution to the historic townscape.

8.149 Therefore, by virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station and the Market Place/London Street Conservation Area. This harm caused to the heritage asset's significance of these designated heritage assets must now be weighed against the benefits of the proposal.

<u>Architectural Detailing</u>

8.150 In terms of the elevational design of buildings, the submitted Design Code and Design and Access Statement set out the intention to create a distinct design aesthetic and provides guidance on how this can be achieved through for example, the use of coloured and textured to various buildings and elements of the scheme. The Design

and Access Statement points to an interpretation of industrial red brick Reading with ques taken from Queen Victoria Street. The Design Code recognises the prominence of the site when viewed from the Station and as part of the North/South route and to appear positive when viewed from this perspective.

8.151 The principles set out within the Design Code are considered to provide a broad degree of clarity over how the scheme can result he creation of a distinctive and exciting sense of place through detailing. The Council will be asked to consider the detail as part of subsequent reserved matters applications and can, therefore, influence the finished scheme at the appropriate time in the future.

8.152 Policy CC7 requires that development responds positively to their local context and create or reinforce local character and distinctiveness. Materials, colour alongside elevations that are well composed, proportioned and detailed are essential. Materials have not been specified as part of this application but could be conditioned as such to ensure appropriate control over the future appearance.

Public Realm

8.153 The Council must be satisfied at the outline stage whether the quality of the public realm interfaces at the site boundaries can be sufficiently controlled at the reserve matter stage.

Policy

8.154 LP CC7, Design and The Public Realm, promotes high design quality. The various components of development form are described, followed by several relevant urban design objectives including:
'Quality of the public realm and provision of green infrastructure and landscaping'.

8.155 Developments will also be assessed to ensure that they (among several criteria) including that they:

Are visually attractive as a result of good high-quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

8.156 CR2 Design in Central Reading refers to a 'City Centre Framework' (CCF), published in 2002, setting out an urban design framework for the central area. The CCF provided the basis for much of the Central Reading section of the Local Plan. Development is to provide well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas (LP CR2b). Where possible, development should provide green infrastructure designed to enhance the otherwise very urban environment (LP CR2c).

8.157 CR3(i) requires all proposals on sites of more than 1 hectare within the Central Reading boundary to provide new public open space or civic squares integrated with surrounding development.

8.158 The Allocated Site (CR11g) and the Application Site exceed 1 hectare.

8.159 The importance of the public realm is emphasised within the 'Principles' section of the RSAF (paragraph 3.6):

"The redevelopment of large sites provides the opportunity to secure landscaped public space and to extend public access. The layout of these will incorporate east-west and north-south routes to enhance movement and linkages across the area, whilst the construction of a pedestrian/cycle bridge linking the Area to Christchurch Meadows will further integrate and ensure good accessibility to adjoining open spaces."

8.160 The RSAF states the creation of a quality public realm should be the foremost consideration in bringing forward development proposals. This should be a key destination, integrated into the fabric if the centre, and the vision for the area is dependent on a high quality of public spaces (RSAF para.5.1).

8.161 RSAF aims (para. 5.4) include 'stitching together' the various development sites within the Area both physically and visually.

Assessment

8.162 Officers raise concerns in relation to several aspects of the interfaces of the proposed development that need to be addressed in principle at the outline stage.

Station Square North and Northern Interchange:

8.163 The parameter Plans, DAS and Design Code, contain little or no guidance on how the Development will help frame, protect, and enhance the setting of the Square and the start of the North-South Route.

East-West Spine:

8.164 An unusual dual road configuration separately serves the Application Site and the adjacent RMG site.

8.165 The east-west spine travels along long the southern boundary of the Application Site. The illustrative masterplan and Parameter Plans show a service road running east-west along this boundary. The proposals for the adjacent RMG site show a similar parallel road.

8.166 Either road appears sufficient to serve both developments, whilst creating two parallel roads will mean a vast area given over to vehicle circulation that will act as a barrier to pedestrians crossing from one side of the street to the other and a general dominance of vehicle movements over pedestrians.

8.167 A practical solution is to require that whichever developer- RMG or Aviva- is first to construct the spine road agrees to permit access to the adjacent site, avoiding the need for parallel service roads. The application before the committee proposes no such mechanism when the developer of the RMG site has agreed to a satisfactory mechanism.

Vastern Road:

8.168 RSAF Paragraph 5.6 lists Vastern Road as a Public Realm Priority.

8.169 The aim should be to create a tree-lined avenue with sufficient planting margins to enable tree-planting of sufficient scale to frame views along the very-wide avenue and soften the harsh dual carriageway environment.

8.170 The Parameter Plans, to be approved at the outline stage, set the edges of development plots close to the existing back of pavement. As a result, the scope to form the tree-lined avenue with sufficient planting margins will be limited.

Western area of public space:

8.171 The location and form of the area of the proposed public realm in the western part of the site does not conform either with Local Plan Fig 5.3 Station River major Opportunity Area Strategy (showing a diagonal street in yellow extending from Caversham Road towards the Station marked in the key 'activation of key routes and spaces with town centre uses') or the RSAF Fig 8.2- Framework Structure.

8.172 The proposed public space will not mark the gateway of the meeting of the east-west spine road with Caversham Road.

8.173 As noted above in relation to the Vastern Road, Parameter Plan Plot A is set immediately at the back of the pavement adjacent to the Caversham Road/Vastern Road roundabout. It severely limits the ability to form a sufficiently generous planted margin to allow tree-planting to form the tree-lined avenues envisaged in the RSAF.

Conclusions

8.174 The proposed siting of development plots, the public realm and vehicular access arrangements at the interface of the Development with Vastern Road, Caversham Road, and the remainder of the CR11e Allocated Site Station (including Square North) fail to maximise and secure high-quality public realm, make the most efficient use of the site, achieve effective permeability, and fail to adopt a comprehensive approach to the development of the Allocated Site as a whole.

9. Flood Risk and Drainage

9.1 The application site currently lies within Flood Risk Zone 2 (Medium Probability) (between 1 in 100 and 1 in 1000 annual probability of river flooding). Therefore, the appeal proposal needs to be assessed in the context of national policy within NPPF Section 14. 'Meeting the Challenge of Climate Change, Flooding and Coastal Change', the NPPG - 'Flood Risk and Coastal Change (Aug 2021), and RBLP Policy EN18: Flooding and Sustainable Drainage and the RSAF (2010).

9.2 The key thrust of national and local planning policy is that when determining applications LPAs should ensure that inappropriate development in areas at risk of flooding should be avoided by directing development to the areas of lowest flood risk, but where development is necessary it should be made safe for its lifetime without increasing flood risk elsewhere.

9.3 The NPPF requires strategic policies to be informed by a strategic flood risk assessment. The RBLP was informed by a Level 1 Strategic Flood Risk Assessment (SFRA)[1], which assess flood risk across the Borough from a range of sources, and provides a basis for the Council to inform planning decisions. The Council also undertook a Level 2 Strategic Flood Risk Assessment (SFRA)[2] for proposed allocated sites, including the appeal site, which considered the risk of flooding in greater detail within its local context, to ensure that the site could be developed in a safe and sustainable manner for the proposed mix of uses and indicative quantum as set out within the allocation, subject to other relevant policy and material considerations. The SFRA concludes that the flood risk of the majority of the appeal site would be within Zone 3A (High Probability) once allowances (+25% and +35%) for climate change flood events are taken into consideration. However, the SFRA states that *"A review of flood risk within the site has been carried out, and it is considered feasible to design the site in such a way that it remains safe throughout the lifetime of the development."*

9.4 The SFRA also enables the Council to apply the Sequential Test, the aim of which is to steer new development to areas with the lowest risk of flooding from any source (paragraphs 161 and 162 of the NPPF). Where it is not possible to site specific types of development in lower flood risk areas, national policy requires the application of the Exception Test, informed by an SFRA or site specific flood risk assessment. Paragraph 164 of the NPPF states that to pass the Exception Test it should be demonstrated that:

"a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

9.5 As the application site is allocated it has been subject to both the Sequential and Exceptions Tests[3]. However, Paragraph 166 of the NPPF states that *"the exception*

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[1] https://images.reading.gov.uk/2019/12/SFRA_main_June_17.pdf Reading Borough Council Level 1 SFRA, June 2017

[2] https://images.reading.gov.uk/2019/12/27560_RBC_L2_SFRA_Report_Dec17_AppB.pdf Level 2 Strategic Flood Risk Assessment , Dec 2017

[3] https://images.reading.gov.uk/2019/12/EV028_Sequential_and_Exception_Test_Local_Plan_2018.pdf

test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan making stage, or if more recent information about existing or potential flood risk should be taken into account." This is reiterated in RBLP paragraph. 4.2.98 where it is stated that "*there is no need for this to be repeated unless the proposed use and/or flood risk vulnerability classification would differ from the allocation*". It is not considered that the exception test needs to be reapplied as the appeal proposal is broadly in alignment with the overall footprint of development as envisaged through the local plan. Therefore, as the exception test was applied though the Local Plan process and this determined that the sustainability benefits would outweigh the flood risk, and the Level 2 SFRA states that *"it was considered feasible to design the site in such a way that it remains safe throughout the lifetime of the development"* no further assessment against the sequential and exceptions test are required.

9.6 However, the Level 2 SFRA made it clear that it was essential that a number of design recommendations be incorporated into any scheme.

9.7 The applicant submitted a site-specific Flood Risk Assessment[4], and in accordance with NPPF (Paragraph 167), also set out in RBLP Policy EN18, in assessing this, the LPA needs to be satisfied that flood risk would not be increased elsewhere and that:

"a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."

9.8 The FRA confirms that the Flood Zone maps show the Appeal site to be located in Flood Zone 2 in present day circumstances, with areas in Flood 3a when applying climate change allowances up to 2070 and 2115 and the Applicant concludes that that the proposed development could be occupied for the land uses applied for and operated safely and that there would be no increase in the level of flood risk to the Appeal site nor neighbouring sites as a result of the proposed development.

9.9 As required under policy the FRA identifies measures to manage the risk of flooding and these are summarised as follows under the relevant design recommendations from the Council's Level 2 SFRA:

Reading Borough Council Sequential and Exception Test of Sites in the Submission Draft Local Plan, March 2018

[4] Flood Risk Assessment, prepared by Simpson/TWS, ref: P-19-418, 24th January 2020, Technical Appendix 2.4, within Volume 3 of the Environmental Statement (Feb 2020, prepared by Ramboll)

LEVEL 2 SFRA Design Recommendations (summarised)	FRA – Proposed Risk Management Measures
1. Floor levels within the site should be situated a minimum of 300mm above the 1 in 100 annual probability plus allowance for climate change, in this instance +25%, assuming a 100 year lifetime for residential development.	Finished floor level at a minimum of 300mm above the predicted design flood level, i.e. at 38.59m AOD, ensuring that the ground floor would be raised 300mm above the maximum predicted flood level + climate change allowance.
2. Flood storage should be analysed to show that the proposed building footprint of the development will not cause a detriment to the available storage during the 1 in 100 annual probability +25% climate change allowance flood event. The presence of a significant existing building footprint suggest that floodplain storage capacity could be improved through effective design measures.	The FRA includes results of an analysis of floodwater depths and volumes within the existing site and concludes that the proposed building plots (as shown on The Parameters Plan drawing ref PP-102) would have the potential to displace floodwater, as buildings would encroach within the extents of the flood plan for 1% AEP[5] +25% CC (climate change allowance). It is proposed to provide the necessary levels of compensation on a "level for level" & "volume for volume" basis, identified as being achieved *"at the proposed access and egress, along with the southeast corner of the site"*. The Applicant states that *"the proposed volumes of compensatory storage have been analysed and the results of the modelling demonstrate that predevelopment flood storage levels would not be reduced as a result of the proposed development and that there would not be an increase in the risk of flooding elsewhere."*
3. Where appropriate, buildings should adopt resilient design techniques.	This is not addressed in the FRA, however, as the appeal proposal is an outline scheme, further details would be sought at the reserved matters stage and could be addressed through a suitably worded condition.
4. Sustainable Drainage Systems (SuDS) should be incorporated into the site design, aiming to achieve greenfield runoff rates, if feasible.	The appeal proposal includes for SUDS and detailed within the SUDS section below.
5. Safe access is available in the current 1 in 100 annual probability flood event and a 'Flood Management and Evacuation Plan' is prepared to consider the impacts in the climate change scenarios.	The 1% AEP + 35% CC flood level of 38.34mAOD has been used to assess the access routes to land outside the Floodplain and a flood hazard map produced (shown in Appendix F of the FRA). The conclusions in the FRA are that when flooding does occur the rate of rise and fall in water level is slow

[5] AEP - Annual Exceedance Probability - term which **expresses the likelihood of a flood of a given size or larger occurring in a given year**. AEP is expressed as a percentage (%). If a flood has an AEP of 1%, it has a one in 100 likelihood of occurring in any given year

	and velocities will correspondingly be slow due to the distance from the River Thames. Also that the flood depths in the landscaping area of the development would generally be less than 200mm in depth for the 1% AEP + 35% CC flood level of 38.34mAOD, and would be a "Very Low Hazard" in line with relevant guidance[6]. However, as land outside the floodplain could be affected the FRA states that *"a flood risk management plan / evacuation plan should be prepared to inform future tenants / residents of the potential flood risk and the appropriate response in the event of a flood warning."*
6. It is essential to ensure that all basement areas within flood affected areas of the site are watertight, and the entrance point is situated above the 1 in 100 annual probability +25% allowance for climate change flood level. Basements should not be used to provide habitable areas in locations classified at Flood Zone 2 'Medium Probability'.	No reference to the technical details of any proposed basements within the submitted information.
7. Residual risk to the development should be investigated against the 1 in 100 annual probability +35% allowance for climate change flood event.	The FRA assesses this.

9.10 The FRA was reviewed by the Environment Agency who objected to the proposal (May 2020) on the basis that the submitted FRA did *"not have sufficient detail about the flood risks and mitigation measures"* and in particular failed to: "

- *Consider how people will be kept safe from the identified flood hazards;*
- *Demonstrate how safe egress and access will be maintained during a flood event; and*
- *The proposed flood mitigation methods identified for compensating displaced flood water have not been adequately justified."*

9.11 The EA letter sets out that their objection could be overcome through the submission of additional information on:

- *"How the volumetric compensation will be installed and what volume is being compensated; and*
- *Are there any alternative locations to provide compensation avoiding the egress and access routes?"*

[6] FD2320/TR2: Framework and Guidance for Assessing and Managing Flood Risk Development (DEFRA, EA, 2005) and FD2321/TR1: The Flood Risks to People Methodology, Flood Risks to People Technical Report (DEFRA, EA, 2006)

9.12 In response to the EA's objection, the Applicant submitted a Technical Briefing Note (July 2020)[7] seeking to overcome their objection. This Note includes explanation that further clarify was sought from the EA by the Applicant and that the EA stated their concern was in relation to the proposed compensated areas for flood storage allowed for within the principal access / egress's of the site, in particular the safe access route to Flood Zone 1, 2 and 3. In addition that they requested further information on the difference in the proposed and existing building footprints.

9.13 It is proposed to lower the levels within areas of the appeal site in order to provide necessary compensation to ensure the capacity of the Floodplain would not be reduced. The total volume displaced by buildings would be ca 63m3, and in terms of compensation, the Applicant's view is that the proposed flood storage volumes would not represent a change in volumetric totals, and that displaced volumes would be compensated for on a volume for volume basis. The areas proposed for flood storage are already contained within the originally submitted FRA. The Applicant's view is that displaced flood volumes would be adequately compensated for within the proposed landscaping of the appeal site and that there would be no necessity for other methods of flood compensation to be provided, such as though floor voids.

9.14 In response to the concern raised by the EA relating to the proposed flood storage falling along the access / egress of the application site, the Applicant states that as the area surrounding the application site would nearly all become inundated in the event of fluvial flooding, there would be no significant benefit in relocating the proposed compensation areas.

9.15 To date the EA have not provided further comments, so it has not been confirmed whether the appeal scheme would wholly satisfy national and local flood risk policy and guidance with respect to providing effective and appropriate compensation. This will be reported in an update report and officers reserve their position, which may include a further reason for refusal related to flood risk.

9.16 Paragraph 079 of the 'Flood Risk and Coastal Change' NPPG states that *"new development should only be considered appropriate in areas at risk of flooding if priority has been given to the used of sustainable drainage systems"* and major developments should provide sustainable drainage systems unless demonstrated to be inappropriate"[3].

9.17 At the local level Policy EN18 states that "*All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards…… Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS."*

9.18 The FRA includes a section on 'Surface Water Management and Drainage Strategy'. It states that it would be appropriate to discharge surface water runoff from the

[7] Technical Briefing Note: Statement to address Environment Agency Objection Response Letter 14th May 2020 for Outline Planning Application: 200328 Vastern Court, Caversham Road, Reading, received July 2020

[3] Town and Country Planning (Development Management Procedure) (England) Order 2015

development to the existing culverted watercourse southeast of the site. The appeal scheme has been developed on the basis of incorporating SuDS in the form of green and blue roofs, below ground geocellular storage tanks, permeable paving and filter trips/ tree pit bio-retention systems. This is with the purpose of ensuring that surface water run off would be limited nearer to a greenfield run off rate, whilst also providing for sufficient capacity for excess runoff to be stored and attenuated on site. It is proposed to restrict the rates for the 1 in 1 year event equal to 3.5l/s, which would be a significant reduction in comparison to the established pre-development runoff rates. The report's conclusion is that the runoff volume would be discharged at a rate which does not adversely affect flood risk.

9.19 The Council is the Lead Local Flood Authority and the relevant officer has confirmed that the proposed scheme as set out in the FRA is acceptable, subject to being secured in further detail at the Reserved Matters stage.

10. Trees, Landscaping & Ecology

Trees & Landscaping

10.1 There is a significant level of national and local policy support for tree planting and green infrastructure as follows. NPPF para. 131 sets out that:

"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-lined 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."

10.2 The importance of tree planting and other green infrastructure is further emphasised in the National Model Design Code (July 2021).

10.3 At the local level Policy EN12 requires new development to *"Provide new tree planting, wildlife friendly landscaping…..wherever practicable"*. Policy EN14 states that:

"Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained."

10.4 Trees and landscaping are important with respect to improving air quality (Policy EN15) and can be incorporated into SUDS provision (Policy EN18).

10.5 The overarching design policy CC7 makes it clear that the "*Quality of the public realm and provision of green infrastructure and landscaping*" is a key component of development form, which contributes to maintaining and enhancing the character and appearance of an area. Central Reading specific policy CR3 relates to development needing to positively contribute towards the quality of the public realm and the site allocation policy (CR11) makes direct reference to:

"Development in the Station/River Major Opportunity Area will:……
v) Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames…";

10.6 Policy CR11e states the site should provide for *"…A high quality route incorporating a green link ….through to the Thames."*

10.7 The Council's Tree Strategy identifies the site within a low canopy cover Ward, on a designated 'treed corridor and within the AQMA, hence a priority area for tree retention and planting. It is vital therefore, that there is tree planting, especially to the frontage as a means to increase canopy cover overall on the site. It would also re-establish the former double-sided avenue of trees on this main route within the centre of Reading.

10.8 The RSAF (para 5.22) recognises that the changes as envisaged through the sites allocated in the RBLP could "*transform the character of Vastern Road… into a tree lined avenue as a central element of the town centre public realm, by planting in in the central reservation and creating planted verges*". There are further sections identifying indicative landscaping within the framework, including tree planting on the Vastern Road frontage, as well as reference to the consideration of green roofs and living walls. In addition, there should be a landscaping link with adjacent sites through use of species.

10.9 Whilst the RSAF is still a live and current document it should be noted that since its adoption in 2010 the Council has adopted a new Local Plan, declared a climate emergency with a Revised Climate Change Action Plan, Tree Strategy and Biodiversity Action Plan, hence these more current policies/ documents and requirements are used to guide the principles within the RSAF.

10.10 It is clear from the policy review that landscaping will be an integral part of the site to provide the 'in principle' features indicated in the RSAF and to meet local plan polices and met the aims of the relevant strategies aiming to achieve a carbon zero Reading by 2030.

10.11 The overall principles for landscaping, supported by policy and adopted documents, and as discussed at pre-application stage (190513) are as follows:

- Retention of good quality established trees where feasible;
- A net gain in tree number across the sites – preferably 3 for 1;
- Species link through the sites (each applicant will have to be aware what the other is proposing – given the advance stage of the Royal Mail site, SSE have used those species proposed to guide their own planting palette);
- Species selection to respond to the microclimate, e.g. shady areas, windy locations, polluted frontages;
- Species selection as way-finding;
- Species selective to provide diversity (including avoiding over-represented species in the Borough, e.g. Prunus and Tilia)
- Species selection to provide wildlife value;
- Creation of 'avenue' planting, particularly along the north-south route which should aim for a double row (potentially staggered);
- Use of large canopy species;
- Perimeter planting along the Vastern Road and Caversham Road frontages;
- Defensive planting to respond to secure design concerns;
- High quality tree pits, including use of root cells to provide sufficient rooting volumes within hard landscape areas; and
- Use of green walls and roofs.

10.12 The amended outline scheme as documented in Amended Outline Planning Application Booklet (Oct 2021) includes the 'Amended Development Parameters' comprising the relevant Development Parameter Plans and Development Parameter Text, that a

detailed scheme is intended to accord with. With respect to landscaping this includes the following:

- At least 10% of the overall site areas would be for publicly accessible open space, including, but not limited to public realm, including hard and soft landscaping, amenity spaces and children's play provision.

10.13 In addition there is a Design Code (Sept 2021), which is described as a "set of specific rules and requirements to guide the physical development" and "will be used to guide the preparation, and assess the acceptability, of future Reserved Matters applications". This includes a specific section (6) on public realm. This document is identified by the Applicant as one for which approval through a condition is sought.

10.14 The Natural Environment Officer provided comments following the initial submission (April 2020), which highlighted many concerns about the trees and landscaping aspects of the proposal.

10.15 Following review of the amended submission in October 2021, the Officer has confirmed that there have been no substantive amendments in terms of tree and landscaping matters, and therefore, their view remains that the proposals would be unacceptable from this perspective.

10.16 Within the Planning Application Booklet, Parameter Plan- Building Plots 17043 PP-102 Rev P2, shows beige shaded areas, which are areas within which buildings are to be located. For the scheme to be acceptable in relation to the seven existing protected trees on the Caversham Road and Vastern Road frontages, and the provision of an adequate landscape buffer on the Vastern Road frontage, final designs would have to reduce these areas.

10.17 It is clear from a review of the submitted Arboricultural Impact Assessment (AIA) and the detailed comments made by the Natural Environment Officer, that there are number of issues with respect to trees and the landscaping proposals presented, for a scheme being developed at detailed stage, at the maximum building footprint, as presented on the Parameter Plan 17043 PP-102 and the 'Illustrative Landscape Masterplan' (Fig. 7.8 of the amended DAS, Sept. 2021). In relation to trees, these concerns can be summarised as follows:

- There would be a loss of 15 trees including 5 of the 7 protected trees, 3 of which are category B trees, i.e. those expected to be retained during redevelopment.
- The AIA suggests that the removal of TPO trees would result in an impact on the Vastern Road street scene (para 5.5) and that this would be mitigated with new landscaping secured as part of a reserved matters or detailed planning application. However, the principle of removing high quality, established trees should be avoided.
- Para 5.9 of the AIA states that *"The location of the boundary for Plot A lies along the edge of the existing crown extents and requires consideration for future crown growth. Both London plane and Norway maple species are tolerant of pruning and the form of the trees will allow approximately 1.5m crown reduction of the eastern aspect of the tree canopies to suitable growth points, as such there is no concern raised regarding the maximum western extent of development proposed in Plot A"*. However, the redevelopment of a site should be an opportunity to give existing, high quality retained trees an improved environment, i.e. space for greater canopy spread space, not buildings being sited which would lead to the need for repeated pruning

- Insufficient detail on specific existing trees with respect to the east-west route (tree labelled in the AIA as T16).

10.18 Additionally, the Natural Environment Officer has highlighted a number of detailed points as to why the landscape principles within the submitted Design Code would not be acceptable (and are indeed in conflict with the submitted Parameter plans). Therefore, this document, also sought for approval by the applicant, could also not be supported by officers. The reasons why it would be unacceptable are as follows:

- Para. 6.1.1 (Kennet-Thames Spine) sets out a 20m width (building C to building D) which is inconsistent with 23m shown on the parameter plans.

- Para. 6.1.2 (The Avenue/ Main Street) refers to a mandatory requirement that *"The junction with Caversham Road must consider the possibility [officer emphasis] of retention of existing trees to create a green and inviting entrance to the development to encourage pedestrian and cycle through route"*. This is an absolute requirement as well established, high amenity Council and TPO trees should be considered as a constraint.

- Para. 6.1.3 (Secondary Street) indicates a total width of 14m for West street and total of 19m for East Street, neither of which are consistent with the Parameter plans which show both as a minimum 20m width.

- Para. 6.1.4 (Urban Edge / Vastern Rd frontage) includes the following as a mandatory requirement:
  - *The development will seek to retain existing trees along Caversham Road of high value where possible.*
  - *Street tree planting must be considered where this is possible to provide.*

  There is no evidence in submissions to indicate that existing, protected trees have been considered at all and similarly street tree planting is an absolute requirement.

  The discretionary requirements include:

  - *Mature tree specimens could be provided to mitigate any losses from site enabling development. Large species where possible.*
  - *Areas of planting to provided where the width of the footway permits without hindering pedestrian and cycle movement*

  Reference to 'large species' is non-specific. 'Large canopy species' is what is supported through the relevant policy and guidance, as set out above, and 'large species' is not the tall and narrow species that the submitted information appears to suggest. The main frontage should include 'large canopy species' with sufficient space around them to remove future conflict with buildings. Planting along the frontage is a must and the necessary space for such should be provided **in addition to** the required space for footways and cycleways.

- Para 6.1.5 (Pocket Squares and Podiums) includes only a discretionary requirement for tree planting, which is not acceptable.

- Para. 6.1.6 (Green roofs) states only as a discretionary requirement that *'The Site will seek, where possible, to provide green roofs'*. The Applicant would be

strongly advised to commit to green provision based on the clear policy support set out above.

- The overall scheme relies largely on off-site tree planting along the Vastern Road frontage, which is not considered an acceptable approach. Off-site provision should not be the default position, but only agreed if planting with a development site is demonstrated to be unfeasible – we have no such demonstration.

10.19 As a final point, the illustrative plans as presented would rely, it seems, on adjustment of the overall site levels. The site includes a current difference in levels with the site at an elevated level compared to Vastern Road. It is unclear from the submissions how this change in level would be accommodated and how it would allow the required landscape buffer on the Vastern Road frontage.

10.20 Although, on the basis that the 'Building Plots' parameter plan does not indicate the final footprints of the buildings, the Natural Environment Officer, has indicated that they would be satisfied, but only if appropriately worded conditions were agreed with the applicant, that could be secured at Reserved Matters, to allow acceptable tree retention and protection and an appropriate landscaping scheme.

10.21 However, in light of other details sought for approval by the applicant, i.e. as set out in the Amended Development Parameters Schedule (Amended Outline Planning Application Booklet, Oct 2021) that seek to secure approval for an overall minimum floor space, and within building height restrictions, it may not be possible to achieve sufficient land for the required trees and overall landscaping.

10.22 Therefore, notwithstanding the Natural Environment Officer's view that it could be possible to address concerns with suitably worded conditions, because of the interplay between the parameter plans, for which the applicant is seeking approval, it is not considered feasible that a suitably worded condition, to address the concerns at this stage, could be prepared, without creating a conflict. There is insufficient evidence that such conflict could be overcome. As a result, there is an overriding objection to the submission material, sought for approval, because it is considered that there is insufficient information to confirm that the required trees and landscaping, based on policy, tree and overall landscape principles, as set out in paragraph 10.11 above, would be achievable.

10.23 The conclusion is that based on the parameter plans and Design Code, that the landscaping principles sought for the site, as set out in para. 10.11 above, could not be achieved, and therefore, the proposal would not comply with the relevant national, local policies and guidance and this therefore, forms a reason for refusal.

<u>Ecology</u>

10.24 The site is not located within in area with a statutory designation for wildlife; there are non-statutory sites within 1km of the site. It does not form part of the local 'Green Network' defined under RBLP Policy EN12. However, under national policy (NPPF Section 15, para 174) it states that *"planning policies and decision should contribute to and enhance the natural and local environment by …d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures…"*. The RSAF also identifies the significance of new landscaping, which could include green walls, green and brown roofs, and tree planting, to biodiversity enhancement.

10.25 At the local level Policy EN12 requires that development should provide a *"net gain for biodiversity wherever possible…. and wherever possible enhance features of biodiversity interest on and adjacent to the application site… Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable."*

10.26 The Applicant prepared an extended Phase1 Habitat Survey in April 2019 and the findings of this fed into their submitted Ecological Impact Assessment (EcIA – Ramboll, Technical Appendix 2.4 of the ES). This sets out that the site comprises buildings, hardstanding, amenity grassland, shrubs, scattered trees and slate chippings and the view that the grassland, shrub and trees are "*of importance at site level only."* This description and assessment of importance is confirmed by Officers as reasonable.

10.27 The Council's Ecology Officer has confirmed that the proposal is unlikely to have any significant adverse impacts on protected species, priority habitats or protected wildlife sites and any negative impacts could be mitigated via the implementation of a Construction Environmental Management Plan.

10.28 The EcIA sets out a number of mitigation and enhancement measures to reduce residual negative effects on existing biodiversity and to set out biodiversity enhancements that the proposal could offer. These include:

- Construction Environmental Management Plan;
- Timing of vegetation clearance works to avoid impacts on nesting birds
- Landscape planting plan to include native species and those with wildlife value; and
- Provision of bird and bat boxes.

10.29 However, notwithstanding the above, for the reasons set out within the trees and landscaping section above, it has not been clearly demonstrated how the proposal would consolidate, extend and or enhance the Green Network, or that it has been designed to maximise the opportunities for enhancing the network as is required under Policy EN12. Therefore, this would form part of the trees, landscaping and ecology reason for refusal.

10.30 It should also be noted that, although any development of this site, which has little vegetation, could result in a net gain for biodiversity, no calculator to demonstrate this, has been submitted. Furthermore, no reference to this has been made in the submitted documents and, therefore it has not been clearly demonstrated that the proposals would meet Policy EN12, in terms of *"development …should provide a new gain for biodiversity wherever possible"* or paragraphs 174, 179 and 180 of the NPPF. However, the requirement for formally demonstrating biodiversity net gain in this way is yet to become mandatory, and in any case, it is considered that further detail could be provided as part of the reserved matters stage.

10.31 In conclusion, officers consider that overall, biodiversity enhancements could potentially be satisfactorily achieved with conditions requiring submission and approval of details, relating to biodiversity enhancements, boundary treatments, lighting and a Construction Environmental Management Plan, appropriately worded for a phased development, at the reserved matters stage. However, there is a fundamental concern that, based on the submitted parameters, and in light of the trees and landscaping concerns, there would be inadequate space for meaningful

landscaping and in turn ecological enhancement features, and therefore, it is considered that Policy EN12 would not be fully met with the outline scheme as presented.

11. Daylight, Sunlight and Microclimate

Daylight and sunlight

11.1 BRE were instructed by the LPA to undertake an independent review of the daylight and sunlight report submitted in support of the application. The Executive Summary of BRE's report (January 2022) included the following:

- Loss of daylight to some windows and rooms at 87-97 Caversham Road would be outside the BRE guidelines, though the retained levels would be only just outside the recommended values. This would count as a minor adverse impact. The proposed development to the south (Hermes/Reading Metropolitan) would cause an additional cumulative reduction, but not by much. Loss of sunlight would meet the BRE guidelines.
- Loss of daylight to 17-49 Caversham Road would be outside the BRE guidelines. This is classified as a major adverse impact to numbers 21-49 as all the windows at the front of the houses would be affected including main living rooms, and the loss of light is well outside the guidelines. Number 51 has not been analysed and its front windows would be expected to have a similar loss of light to number 49. For numbers 17 and 19 the loss of daylight is assessed as a moderate impact. There would be little or no cumulative impact from other proposed schemes. Loss of sunlight would meet the BRE guidelines.
- The cumulative assessment has not considered loss of daylight to the Hermes/Reading Metropolitan scheme, or loss of daylight and sunlight to the SSE site across Vastern Road. These should have been addressed in the Environmental Statement.
- A large number of living rooms in the proposed development are predicted to have limited daylight. CHP Surveyors have analysed worst case rooms on the lower floors of Blocks B and C. With the Hermes/Reading Metropolitan scheme in place, 79 (44%) of these 177 living rooms would not meet the minimum recommendation for daylight provision. For bedrooms, compliance rates are better with just 14 not meeting the recommended 1%.
- Sunlight provision in these rooms on the lower floors would be poor, with just 21 (12% of 180) living rooms and studios analysed meeting the BRE/BS sunlight recommendations with the Hermes scheme in place.
- There are no existing gardens in which sunlight could be affected by the proposed development. Sunlight provision in open spaces in the proposed scheme itself varies, with most of the roof terraces and the courtyard to Block B appearing to meet the recommendation, while the courtyard to Block C would not. The results are not clearly labelled, and it is surprising that the results for Blocks B and C are so different when they have a similar design. With the existing surroundings, the Environmental Statement indicates that sunlight in the open spaces between Blocks A and B and between Blocks C and D would meet the recommendation, while the space between Blocks B and C would not. A cumulative assessment Of these spaces with the Hermes scheme in place should have been included in the Environmental Statement.

11.2 Upon receipt of their advice Officers went back to BRE on a number of issues were further clarification was considered necessary and BRE responded confirming the following points:

- Whilst the appellants they could improve daylight provision to the proposed development at the reserved matters stage so that nearly all rooms complied

with the ADF recommendations, especially for the living rooms, they have not demonstrated how they would do this. For some of the more obstructed living rooms this would involve removing balconies, and Officers consider that the removal of the balconies would result in those residential units not having enough private amenity space.

- For daylight and sunlight provision in the new development, the applicant could demonstrate how mitigation measures could improve the daylight and sunlight in the scheme, though they have not yet done so.
- Mitigation is unlikely to make much difference to the loss of light to existing residents in Vastern Road, unless they reduce the maximum parameters significantly. BRE disagree with the statement that all neighbouring properties will retain appropriate access to daylight.

11.3 BRE conclude their email by making it clear if Officers are minded to refuse the scheme, then it would be reasonable to refuse on the grounds of loss of daylight to existing residents. They also request that there is reason for refusal that the applicants have not demonstrated whether acceptable living conditions (daylight and sunlight) could be achieved in the new development.

<u>Wind/microclimate</u>

11.4 BRE were instructed by the LPA to undertake an independent review of the Wind Microclimate Chapter of the Environmental Statement and the supporting Technical Report, and to provide an opinion on whether:

> a) The level and nature (including the methodology) of information submitted is sufficient and proportionate to the proposed level of outline development sought in this instance.
>
> b) The analysis and conclusions reached within the relevant sections of the ES are reasonable and robust, set within the adopted local policy context of:
>
> Relevant components of Policies CC3 (Adaption to Climate Change), CC8 (Safeguarding Amenity) and CR10 (Tall Buildings) of the Reading Borough Council Local Plan 2019.
>
> c) If it is considered that the analysis / conclusions are not reasonable and robust for such an outline permission, guidance as to what measures (e.g. alternative mitigation measures) / information would be required to address any concerns raised (if any)?

11.5 BRE's report (January 2022) made the following concluding comments:

- The wind microclimate Technical Appendix and ES Chapter as reviewed herein are for an outline planning application.
- The level and nature of information submitted in the Technical Appendix is not considered to be sufficient or robust. There are several omissions and/or clarifications required in the Technical Appendix, in particular with regards to whether the effects of gust wind speed has been considered. Section 5.3.47 of the Reading Borough Council Local Plan states that '*Wind should be assessed*

against the Lawson Criteria', the assessment as presented does not fully implement the Lawson methodology because a seasonal analysis of wind conditions has not been presented.

- As mentioned in this review, at some locations the predicted wind safety conditions are not credible.
- The analysis and conclusions reached within the wind microclimate chapter of the ES (Chapter 9) are generally reasonable and robust, based on the results presented. Some clarification and additional information is required, as indicated in Section 3 of this review, in particular with reference to how the seasonal target wind conditions were assessed when only annual data are presented.
- The relevant components of Policies CC3 (Adaption to Climate Change) and CC8 (Safeguarding Amenity) of the Reading Borough Council Local Plan 2019 have been considered. However, Policy CR10 (Tall Buildings) has not been cited as relevant local planning policy so it is not clear if this has been considered – this should be confirmed.
- The wind microclimate assessment predicts that there will be several areas around the proposed scheme where the wind conditions will be either uncomfortable or unsafe. Such conditions would be unacceptable. Mitigation measures are suggested, which could be conditioned and implemented at the detail design stage. We agree that the efficacy of these measures should be established via a wind tunnel assessment.

11.6 Following receipt of these concerns, Officers emailed BRE with details made in the appellants Statement of Case (SoC) and Statement of Common Ground (SoCG) that there are some suggested conditions for wind (appendix B of the SoCG). They state *"In relation to the completed development phase, the mitigation measures relating to Noise and Vibration and Wind, as set out in the ES can be secured by appropriately worded planning condition and are included in the draft planning conditions set out in the Statement of Common Ground."* No such conditions exist in these documents.

11.7 BRE were therefore specifically asked by Officers that in the absence of having an such conditions within the appeal submission, could planning conditions (in some wording) address those concerns identified in the BRE review. Or were these concerns more fundamental and constitute an objection which in terms of wind and microclimatic conditions, are a result of the fundamentals of the scheme as proposed by the parameters controlling layout, scale (height and massing).

11.8 BRE responded by way of an email dated 2 February 2022, stating that this was a difficult question to answer based on the evidence presented, however:

"Given the height, massing and location of the proposed development, BRE agree that in principle, it is likely that a properly conducted wind tunnel study would address our concerns regarding the wind microclimate and appropriate mitigation measures.

However, the wind microclimate assessment, as submitted by the Applicant, predicts such onerous (unsafe) ground level wind conditions between and around the proposed buildings and at roof terrace level that in our opinion it would be more-or-less impossible to provide the required level of mitigation without very

significant changes to the massing of the scheme or the addition of such extensive barriers and/or canopies, etc. that the character of the scheme would be fundamentally changed.

We believe that the wind microclimate assessment as presented by the Applicant is flawed and significantly over estimates the extent and magnitude of the unsafe wind speeds around the site. However, this is what the Applicant has presented and based on this (and assuming it is correct, unless they present evidence to the contrary) then we would have to conclude that because the wind conditions are predicted to be so bad then the mitigation measures as set out in the ES would not be sufficient to provide the required level of mitigation".

11.9 Policy CC3 which states: *"Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements."*

11.10 Paragraph 4.1.36 to Policy CC8 states: *"One of the key concerns of planning is to ensure that new development does not reduce the quality of the environment for others, particularly where it would affect residential properties. At the same time, ensuring that new development creates a quality living environment for future residents is also critical. The policy aims to ensure that existing and additional residential properties provide an acceptable living environment, which is a key element of a high quality of life. It is applicable to any type of development."*

11.11 Officers consider that the application has to be considered on the basis of the evidence provided to the Council. It is therefore considered that the predicted wind conditions would be so bad that the mitigation measures set out in the ES would not be sufficient to provide the required level of mitigation. Accordingly, until these issues are adequately addressed, it is Officers view that planning permission should be refused on the basis of conflict with policies CC3 and CC8.

12. Amenity

Daylight and Sunlight

12.1 Daylight and sunlight matters have been covered in Chapter 11 above so do not need to be repeated here.

Privacy

12.2 No plot within the application site is considered to cause any unacceptable degree of overlooking towards nearby residential properties. Whilst the perception of overlooking will undoubtedly be increased by the introduction of a substantial increase in built form where nothing comparative exists at present. The way in which any new development would face neighbouring dwellings across v (i.e. front-to-front rather than back-to-back), together with the clear policy backing for taller high-density development in this location, suggests that the proposals would be acceptable in terms of privacy. Furthermore, the setback provided by Caversham Road and Vastern Road themselves reduced the harmful affect of any overlooking.

12.3 The arrangement of plots A - D will allow opposite views from habitable rooms and balconies. However, any views would be across streets and would not be uncharacteristic for such an inner urban area. The minimum street widths (façade to façade) for any scheme composition are considered comparative to other streets within central area and would provide for a satisfactory level of privacy, deemed sufficient to allow a suitable design to come forward in this urban context. The outlook across inner podium courtyards would offer some overlooking, but the nature of such communal amenity space and public realm would rely largely on the final design at reserved matters stage. The privacy aspects of the proposals are therefore considered to be in accordance with Policies CC8 and CR10 on this basis.

Outlook

12.4 With allowance made for the fact the development is located within the most central part of the town, it is considered unlikely that a suitable level of outlook would achievable from all residential properties within the development.

12.5 However, the fact the development includes two closed courtyards (plot B and C - characterized by the presence of continuous development along the entire perimeter), and a single semi-closed courtyard (Plot A), the level of outlook is going to be inherently restricted. This links to the proposed approch of a stepped perimeter block, where the proposed building heights rise and fall around the perimeter in response to orientation – allowing southern light into the courtyard or prevent overshadowing on its northern edge. This provides some outlook at upper levels but, it is accepted that for single aspect flats at lower levels, outlook would be limited.

12.6 The basic approch of closed courtyards on this and the adjoining site within the RSAF is considered to indicate an inherent acceptance to this approach, which would not result in significant harm.

Overbearing

12.7 The tall buildings proposed will undoubtedly have an overbearing effect on their surroundings and is perhaps an unavoidable result of the dramatic increase in scale envisaged within Policy CR11E and the RSAF. The scale of the buildings cannot be

'hidden' and the only way of ensuring no impact would be to locate buildings well away from the surrounding streets, which is not the specific approach set out in policy, including the RSAF. The degree of any overbearing effect would be subjective and different people will experience it differently, however the findings of Section 8. (Design) and Section 11 (daylight, sunlight and microclimate), which are matters which are influenced by and inform the overbearing created by development, suggest that the proposed buildings would be excessive in terms of scale and massing, and therefore conflict with Policies CC8 and CR10.

Noise and Disturbance

12.8 The Council's Environmental Protection Team (EP) has considered the various studies included in the ES regarding noise affecting residential uses within the scheme (Section 14). It must be recognised that the design of the residential aspects of the proposal and the mix of uses has not yet been finalised. As such conditions are recommended to mitigate, including noise assessments for noise insulation for new dwellings.

Living conditions of future occupiers

12.9 As part of any reserved matters application, all dwellings would be expected to meet or exceed the nationally described space standard (as outlined in Policy H5) for the type of dwelling/number of bedrooms. The illustrative proposed floorplans contained within Section 6.9 of the DAS shows integrated wardrobe storage space which is welcomed. As such, the opportunity for the development to provide an acceptable internal arrangement for the flats is considered acceptable in this regard.

12.10 Policy H10 states that *"….flats may be provided with communal outdoor space, balconies and/or roof gardens"*. In such a central location and on such a large site, it will be a significant benefit to the liveability of residents within this development to have access to both good quality private and communal amenity space.

12.11 Given the overall size of the site and flexibility over final dwelling numbers (600-1,000 dwellings), it is considered that sufficient space would exist in principle to provide balconies, terraces and roof gardens for residents, in addition to the podium courtyards within the centre of perimeter blocks (plots A-C). In this instance, the Design Code and the majority of units shown on the illustrative floor plans have access to private balconies. Each balcony appears to be accessed via the primary living space/habitable rooms by either glazed door or a set of bi-fold doors. The balcony/terraces are a sufficient size to allow a small table and chairs and are considered commensurate with the type of units proposed.

12.12 However, as identified in Section 11 (daylight and sunlight), when applying the proposed maximum parameters in terms of height and massing, all balconies are likely to need to be removed simply in order to ensure adequate sunlight and daylight reach both the courtyard and the blocks interior elevations. If balconies were to be removed at reserved matters stage, the council would expect some form of private amenity space to be provided elsewhere. In this regard there would not appear to be the scope or space available within the development to provide any such comparable quality of private amenity space for each unit. Therefore, based on the proposed parameters, it has not been adequately demonstrated how an acceptable level of amenity could be achieved whilst still meeting appropriate daylight and sunlight levels to lower floor flats. Therefore, this aspect would contribute to a reason for refusal.

12.13 Podium courtyards are planned to the centre of each perimeter block, except Plot D, whilst communal roof terraces are proposed to various flat roof sections of each plot. These communal amenity spaces can be enhanced with soft and hard landscaping to be secured at reserved matters stage. Whilst these are not public spaces, if designed appropriately they could offer some semi-private amenity areas which would benefit the occupants of each block rather than a reliance solely upon the podium courtyards. However, as identified above, whether these are good quality areas of communal amenity space depends on the final design allowing sufficient light penetration into the lower levels of the blocks.

12.14 Although the proposed amenity space provision could be acceptable when considered in isolation, the unacceptable height scale and massing and the associated impact on daylight and sunlight mean that this outline permission is unable to provide the necessary comfort that the living conditions of future occupiers would be adequate.

12.15 Despite the envisaged need and policy expectation for a mixture of private and communal amenity spaces to meet the amenity needs of residents, the more informal recreational needs of residents will require access to good quality public open space nearby. The open space requirements of the scheme are specifically considered in Section 15.

Indoor Amenities (Build to Rent)

12.16 Good quality indoor amenities are a defining characteristic of the Build-to-rent model where (if) this is proposed (it is not specifically excluded) and it will be necessary to define and secure provision and retention of the indoor amenity floorspace and uses within the S106 agreement (with some flexibility for changes to the types of amenities built in to the agreement to allow for changing needs and wants over time). These amenities must be made available for all occupiers of the building across all tenures to ensure equitable access to the benefits of the Build to Rent model of housing and this is in line with the approach agreed on other sites within the town centre. This is to be secured in the S106 legal agreement and is in accordance with Policies H4 and the PPG.

13. Transport and Highways

13.1 The NPPF (para 105) states that *"significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

13.2 This overarching policy priority of securing sustainable modes of transport is translated into RBLP Policy TR1, which states that *"All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling".*

13.3 Policy CR2 requires development to contribute "*towards enhanced ease of movement through and around the central area".*

13.4 Policy CR11 requires development in the Station/River Major Opportunity Area to: *"Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance"* and Policy CR11e specific to the application site requires *"…retail will have good pedestrian links to, and will not have a detrimental impact on, the rest of the retail core of the centre. Public car parking will be provided. A high-quality route incorporating a green link should be provided through to the Thames".*

13.5 Policy TR4 states that:
"Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable.

The cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions."

13.6 Policy TR5 addresses car and cycle parking and electric vehicle charging points (EVCP). Parking is to be provided appropriate to the accessibility of the site and further detail is set out in the Council's Parking Standards SPD. In terms of EVCP policy seeks at least 10% of spaces to be provided with an active charging point.

13.7 The RSAF makes it clear that developments within the 'Station Area' should incorporate improvements to east-west and north-south routes to enhance movement and linkages across the area. It identifies a major 'city spine' described as a direct pedestrian route through the historic core, Station Area and through to the Thames, and this is based on the north-south link, considered as the most significant movement corridor for the success of development in the area.

13.8 The Framework also considers that a grid of new or better-connected streets and other pedestrian routes as vital to enhance permeability through the Station area. And includes pedestrian priority measures for the area to the north of the station and south of Vastern Road.

13.9 The application submission includes a Transport Assessment and Interim Travel Plan.

13.10 It is clear that the site is in a highly accessible location being next to Reading Station, served by a number of high frequency bus services, all roads in the vicinity benefitting from comprehensive footway provision, and a number of local cycle routes close to the site providing access to various locations around Reading. It is within walking distance of a vast range of important services and facilities, thus creating opportunities for journeys to be made on foot, by bicycle, and by public transport.

13.11 The proposed scheme includes an upgrade to the foot / cycle way across the Vastern Road frontage, as part of landscaping proposals, cycle parking for residential and commercial uses, including provision for visitors, and vehicle parking, including disabled provision, as well as retaining access from Caversham Road and onto Vastern Road.

North-south link

13.12 The scheme includes for a 23m gap between buildings C and D in order that a pedestrian / cycle / landscape route could be provided which would form part of the improved north / south link identified within the Council's policies. This would be sufficient to accommodate a 5m wide pedestrian / cycle route, although the information submitted fails to show how this would tie in with the route to the station underpass and pedestrian crossing, which is currently subject to another current planning application at the RMG site to the south (182252). However, the Highway Authority have reviewed this and are content that the crossing is located centrally to the two buildings and that there would be sufficient space for a pedestrian cycle route between the two plots, albeit this would require significant alterations to the illustrative landscaping layout, as raised within the 'Trees, Landscaping and Ecology' section above.

13.13 Building plots must not conflict with the requirement to provide a crossing facility on Vastern Road, which would link to 55 Vastern Road site and Christchurch Bridge to the north. This would ensure that the direct route between the Station and the River can be provided and not significantly diminish the route by drawing people away from it, so as to access existing crossing facilities on Vastern Road. It should be noted that 55 Vastern Road is currently awaiting an appeal decision further to a Public Inquiry, which will include determination of issues in relation to the direct pedestrian / cycle route through the site and line of sight through to the River. Should that site be permitted at Appeal, Plot C of the proposal would obstruct the direct pedestrian / cycle route and the line of sight through to the access point of the 55 Vastern Road development. It should also be noted that the illustrative landscaping scheme shows an excessively large zebra crossing rather than the signalised crossing as required. Until the 55 Vastern Road appeal decision has been issued it is not possible to determine whether proposed Plot C would indeed create a conflict, however, given that this is an outline application the Highway Authority is content that the exact positioning of the Plot could be dealt with at Reserved Matters stage to ensure it would not obstruct a direct route to the north and / or a signalised pedestrian crossing.

Accesses

13.14 The proposal includes an indicative vehicle exit onto Caversham Road located where the Vastern Road carriageway changes from a two to three lane carriageway and is

shown as a priority junction not an exit lane, as is currently the case. If this were the final location of the exit this would conflict with approximately two thirds of Plot C as shown on the Building Plots Parameter Plan (PP 102 Rev P2). However, it considered that it would be possible to address this through the Reserved Matters stage, and does not therefore, form the basis of an objection.

13.15 This proposed exit point would also be for larger service and refuse vehicles, which currently exit from Trooper Potts Way, at the eastern edge of the site. However, in order to avoid vehicles extending out further than the inside lane it is likely that an exit lane, similar to that currently provided, would need to be retained as part of the scheme. It is considered that it would be possible to address this through the Reserved Matters stage, and does not therefore, form the basis of an objection.

13.16 As identified by the Transport Development Control Manager at the pre-application stage, there would need to be further assessment of the junction so that the impact of the development on the highway network could be assessed. Access design is not to be considered at this outline application stage and therefore, this would be addressed in detail at the Reserved Matters stage.

13.17 In relation to the access point on Caversham Road discussion has taken place with the applicants of this proposal and the adjoining Royal Mail site to the south that a shared access between the two sites should be provided. The adjoining site is part of the same sub area of allocation CR11 and is subject of a current not yet determined application (RMG site, ref: 182252). However, the submitted information shows an independent access to serve this site only, i.e. resulting in the provision of two roads running parallel to each other serving the two adjacent sites. Although from a purely Highway safety perspective this would be acceptable and would not warrant a reason for refusal on transport grounds, it would be unacceptable on design grounds with respect to the public realm, and this is addressed in Section 8 of this report.

13.18 In order to achieve a coordinated access between the adjoining developments a suitably worded condition/ S106 legal agreement clause would be required to ensure that whichever site were to come forward first would deliver the access road, and the other would take their access off the provided spine road. Had the scheme been acceptable overall this would have been discussed and agreement sought from the applicant in terms of appropriate condition wording and legal agreement clauses.

Cycle/ pedestrian provision

13.19 The Development Footprint plan (PP-100 Rev P1) illustrates a 5m wide strip around the northern boundary of the site to facilitate a footway / cycleway and landscaping. In terms of cycle/ pedestrian provision this indicative width where there is currently an insufficient width however all other existing footway / cycleway width must be retained as existing i.e. some areas are already 4.5m and 5m in width, the extents of which could be determined through the reserved matters applications. However, it should be noted that from a trees and landscaping perspective the shared space of the maximum width of 5m as indicated would not be acceptable. This is set out in Section 10 of the report.

Trip Generation / Traffic Impact

13.20 The Transport Development Control Manager has confirmed that based on proposed trip rates, calculated using the maximum potential floorspaces for each use, there would be a positive impact on vehicle flows.

Parking

Residential

13.21 The Applicant has presented the scheme as a car-free development, save for the provision of disabled car parking spaces. This is detailed as one disabled parking space per 5% of the residential units provided and based on the maximum of 1,000, this would equate to up to 50 spaces. Given the parking restrictions that surround the application site, that would ensure that long stay overspill parking could not occur, and that no permits would be issued to residents of the development, the Transport Development Control Manager has confirmed that this level of provision would be acceptable.

Retail

13.22 At pre-application stage the proposal included a maximum of 3,269 sqm of retail, to which the Highway Authority had no objection, since the anticipated smaller scale units would be unlikely to result in dedicated trips for the units in their own right. However, the maximum presented at this outline stage is for up to 7000sqm, and as this would result in dedicated trips and the requirement for car parking, as advised during the pre-application, a car accumulation assessment would be required to establish what parking should be provided. The Transport Development Control Manager has reviewed the data at Appendix 6 of the submitted Transport Assessment and identified that a parking provision of 114 spaces would be required.

13.23 Based on the trip rate analysis a floor area of 7000sqm would generate approximately 3,300 vehicle movements per day and would not be acceptable without dedicated parking provision. However, it is considered that this could be adequately dealt with by way of a condition stipulating that parking requirements be assessed at the submission of reserved matters.

EVCP

13.24 The proposed development would provide electric charging points in line with the Council's standards and these could be secured through appropriate conditions.

Layout

13.25 The Transport Development Control Manager has confirmed that the satisfactory layout of car parking could be addressed through the reserved matters stage, once the overall layout of the site evolves.

Car Club

13.26 Car Club parking bays are proposed to be provided at street level. The appropriate provision could be secured through a suitable clause in a S016 legal agreement based on the requirement for 2 car club spaces which are funded for a period of 5 years. Such as scheme could be developed through the reserved matters stage.

Cycle Parking

13.27 The overall proposed level of cycle parking would accord with the Council's minimum standards, and this could be addressed through a condition and the layout detailed through the reserved matters stage.

Servicing

13.28 The applicant has stated that the proposals would incorporate facilities to enable a comprehensive servicing strategy with all the servicing to be undertaken on site through dedicated loading bays and servicing yards. It concludes that a Delivery and Servicing Management Plan (DSMP) with appropriate swept path analysis would be provided as part of the detailed applications. Although the Transport Development Control Manager provided specific comments on the servicing arrangements as presented, for the applicant's information (see full comments on the public file), overall it is considered that the servicing of the site could be dealt with by way of a condition that would require specific servicing strategies for each phase.

13.29 Overall it is considered that the transport and highway aspects of the proposal have been considered adequately by the applicant in accordance with Policies CR2, CR11, TR1, TR2, TR3, TR4 and TR5 and the policy guidance contained within the Reading Station Area Framework. The proposal is likely to have a positive impact on the highway network because of a reduction in vehicular movements compared to the existing use, and the site would be in a very sustainable location with respect to its access to a range of modes of transport.

13.30 Had the outline scheme been acceptable overall, it is considered that transport matters could have been suitably controlled through appropriately worded conditions and relevant S106 obligations. However, in the absence of a completed and agreed S106 legal agreement, transport matters will be included within this recommended reason for refusal.

14. Environmental Health matters

Air Quality

14.1 Policy EN15 states that development should have regard to the need to improve air quality. This policy requires mitigation to be provided where development would detrimentally affect air quality or expose new sensitive receptors to into such areas of poor air quality. Policy CR6 requires that proposals for new residential development within the central area will be required to demonstrate how the issue of air quality have been considered and if necessary, mitigated. The Air Quality chapter of the Environmental Statement (ES) contain an assessment of the potential impacts and likely effects of the proposed development on air quality.

14.2 The proposals involve the significant redevelopment of a town centre site within the Air Quality Management Area (AQMA). The site bounded by Caversham Road to the west and Vastern Road to the north which are two of the town centre's main orbital duel carriageways which form part of the Inner Distribution Road. Whilst the design of the residential aspects of the proposals and the mix of uses has not yet been finalised, this development could include up to 1,000 dwellings or a lower amount with a mixture of office and retail.

14.3 It is noted that a large number of car parking spaces are being lost as part of this development, and relatively few being provided in connection with the non-residential uses proposed. Furthermore, the overall use of the site is fundamentally changing from a low-density car orientated retail park to a mixed-use high-density redevelopment as part of the Station Area.

14.4 The Council's Environmental Protection (EP) Team have considered the Air Quality chapter of the ES which also includes a full Air Quality Assessment. This information predicts a slight worsening of air quality at receptors located along Vastern Road due to the new buildings, being taller than existing and effectively trapping pollutants in the area. In this regard the EP Team are not entirely content with the conclusions of these reports and as such require further assessments be undertaken as part of any reserved matters scheme when the exact composition of the development is known along with full details of any mitigation required. General air quality on site is confirmed by the submitted reports to be acceptable where the new residential development is proposed.

14.5 Therefore, relevant air quality conditions are required to ensure air quality if adequately considered at each reserved matters stage. These would include updated air quality assessments and mitigation measures to be submitted, thereby ensuring compliance with Policies EN15 and CR6 in respect of Air Quality.

Noise

14.6 In terms of any negative effects of noise associated directly with the proposal, the principal concerns are construction noise and any harm it may cause to the amenity of surrounding properties (and those which are built and occupied on other parts of the site) and the noise levels received by the flats themselves in terms of noise from within the development by commercial uses and due to road and rail noise. With regard to construction, standard conditions will be required to ensure that hours of construction, deliveries and any required plant associated with the construction phase are undertaken at those time of the day which are not considered to give rise to any significant harm to neighbours.

Contaminated land and stability

14.7 Policy EN16 is clear that development will only be permitted on land affected by contamination where it is demonstrated that the contamination can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.

14.8 The site is potentially contaminated due to its historic use as a railway sidings and yard prior to its use as retail park. It is clear to the EP Team that further ground investigation will be required and as such conditions are recommended for the submission of a site characterisation report; submission of a remediation scheme; implementation of that scheme; the reporting of any unexpected contamination; and decommissioning and removal of any fuel tanks.

14.9 Network Rail makes a number of recommendations regarding the planning application to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission. Network rail recommends that in the interests of safety and land stability, there should be no Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal constructed within 5 metres of Network Rail's boundary or any alterations to ground levels or excavations, other than those proposed in this planning application. However, there are no matters specifically in relation to Contaminated land and stability therefore no additional conditions are considered to be required.

14.10 The proposals are in accordance with Policy EN16 on this basis.

Construction/Demolition Phase

14.11 With regard to the construction and demolition phase, there would be the need to secure full construction management and demolition statement alongside an Environmental Management Plan which would include vermin control, temporary parking and turning prior to commencement of any reserved matters phase.

14.12 Also, as mentioned, standard hours of construction and demolition would ensure the amenity of nearby occupier would not be negatively affected.

15. Community Facilities and Open Space.

Community facilities

15.1 Policy OU1 of the Local Plan 'New and Existing Community Facilities' supports proposals for new, extended or improved community facilities, and requires that such new community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible. Policy CC9 'Securing Infrastructure' goes on to allow for community facilities and leisure and cultural infrastructure to be secured by S106.

15.2 Figure 9.1 of the RSAF sets out the appropriate range of uses on each of the master planned development plots. Although not specifically mentioned in Figure 9.1, the RSAF confirms that community uses will be appropriate across the whole of the station area.

15.3 Paragraph 93 of the NPPF requires LPAs to provide the social, recreational and cultural facilities and services the community needs, and plan positively for the provision of community facilities and other local services to enhance the sustainability of communities and residential environments. The NPPF requires LPAs to ensure that an integrated approach to considering the location of housing, economic uses and community facilities and services.

15.4 The Vastern Court development along with the adjoining development at the RMG site which form the CR11E site allocation is one of the largest and arguably most accessible development in the town centre and should undoubtedly result in exceptional integration with existing community and culture facilities, whilst making adequately meeting the needs of future residents.

15.5 As described in the dwelling mix section of this report, it is envisaged that any subsequent reserved matters stage application for the site or sub-phase within the development will provide either a policy compliant range of dwelling sizes and tenures, or adequate justification for any departure, in order to ensure housing choice and inclusivity for the widest possible group of residents. In particular, the local needs of residents should be catered for through provision of a mix of services which are easily and safely accessible on foot, bike or by public transport, wither within the development, or in the immediate area. It is recognised that specific higher order needs can be met through ensuring safe and attractive accessibility south to Reading town centre and the railway station.

15.6 The planning application seeks amongst other uses, includes a flexible mix of D1 (Non-residential institutions) and D2 (Assembly and leisure) uses. For a development of this scale, such uses could include clinics, health centres, creches, day nurseries etc, however is unlikely to include larger community uses like schools, and there is no local plan requirement for the site to do so.

15.7 A minimum of 2,000sqm and maximum of 7,000sqm of these D1 and D2 uses is proposed alongside other non-residential uses (A1-A5 uses) within Table 1 of the submitted 'Amended Development Parameters Schedule' as part of the Planning Application Booklet. This use range is to be made across all four plots (Plots A, B, C and D), and is likely to come across is varying degrees through the reserved matters submission. The discussed conditions securing relevant use classes and active frontages is considered sufficient to ensure that a suitable range of community and non-community uses informed by a detailed justification in order to ensure that a

truly mixed-use scheme is forthcoming which provides for the need of future residents.

15.8 The Berkshire West Clinical Commissioning Group (CCG) (NHS) did not provide any comments on this outline application, and therefore no definitive position can be arrived at as to whether any healthcare facilities, or their scale and type are required as a result of this development. Furthermore, without knowing the exact amount and type of development which may come forward at reserved matters stage, it would not be possible for the applicant or council to accurately calculate what level of healthcare needs the development would generate. Should it be the case that primary health facilities are required, this can be considered at reserved matters stage, and the exact type and location of any health facility can be reviewed with the CCG in line with the above floorspace parameters.

15.9 With regard to education, CIL covers the general education needs as identified in the Council's Infrastructure Funding Statement (IFS).

Open space

15.10 Paragraph 98 of the NPPF emphasises the importance of access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

15.11 Policy CR2 'Design in Central Reading' states that *"b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;"*

15.12 Policy CR3 'Public realm in Central Reading' requires that "*i. All proposals on sites of more than 1 hectare within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development."* Policy CR3 goes onto require developments to consider "*ii. Imaginative uses of open space and the public realm, which contribute to the offer of the centre, will be encouraged, and new open spaces should be of a size and shape to be flexible enough to accommodate such uses"*

15.13 Policy EN9 'Provision of open space' requires that all new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities. Policy EN9 specifically requires that on sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. The open space requirements of Policy EN9 should be guided by the most up-to-date Open Spaces Strategy.

15.14 The Council's Open Spaces Strategy (OSS) (2007) sets out sets out the strategy to guide the planning, design and management of open spaces in Reading. One of the three key aims of this document is to secure additional open space where opportunities arise. The OSS recognises that public open space has different functions, and is particularly concerned that provision is made for areas of recreation within reasonable walking distance of residences.

15.15 The OSS requires (paragraph 7.7.1) that, *"where appropriate and feasible, deficiencies in open space and play facilities should be redressed through the development process. In new, large residential developments, the provision of a specified minimum size of and minimum facilities for new public open space should be required, clearly defined within Supplementary Planning Guidance."* The same section notes that *"In larger scale commercial/retail developments, the integration of additional public spaces such as civic squares should be required."* These requirements have been included in the subsequent plans and policies referred to above.

15.16 In 2018, the Council published an Open Space Update Note (OSUN). The OSUN considers the changes in the ten years since 2007 and assesses the degree to which the conclusions of the OSS remain relevant. The OSUN concluded that the overall approach of local and national policy remains the same and that overall strategy that was set out within the OSS is still generally valid.

15.16 The OSS Paragraph 7.9.3 of the OSS sets out the guidelines for new open space provision as part of new development proposals. It states that in general, open spaces planning gain will require the following main elements:

- *"In areas deficient in recreational open space, the provision of appropriate (defined below) new public open space, together with a sustainable strategy to ensure its maintenance to a high standard in perpetuity"*
- *"In areas with an adequate quantity of public open space, a financial contribution to improving access to and the quality of existing open space to cater for additional use"*

15.17 The adopted open space standards reproduced in paragraph 4.2.40 of the Local Plan, expects that (amongst other criteria) at least 0.1-0.2ha of open space for recreational use at a maximum of 600m from every home.

15.18 The OSS also states that *"All guidelines recommend that at least some open space for children to play, whether publicly or privately owned, be available within 100-200m of every home. This will primarily affect very high-density developments, like flats…".*

15.19 It is therefore clear that policy clearly expects the provision of on-site open space on a site of this scale.

15.20 The Planning Obligations under Section 106 SPD (adopted April 2015) makes clear that *"Enhancement and management of and access to local outdoor recreation and open space directly serving the development, including provision in line with adopted site- specific policy"* is a matter to be covered by Section 106 as opposed to CIL (see p 6). This SPD continues to have effect in relation to Policy CC9 of the Local Plan, which states that *"Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time"* and which identifies *"Open space, green infrastructure and other measures to improve or enhance biodiversity"* as one of the highest priorities for securing contributions. Therefore, it is clear that open space provision made necessary by a development should be secured by a financial contribution through Section 106 agreement.

15.21 In terms of specific requirements for this site, the RSAF places a strong emphasis on the opportunities provided by large development sites to secure landscaped public space and to extend public access and ensure good accessibility to adjoining open spaces. Paragraph 9.13 makes clear that the RSAF identifies approximately 4 hectares which should to be laid out as both streets and squares, open space and new footpaths in order to create a setting for development. Whilst no specific proportion or detail as to the amount of open space on this part of the site is provided, the 'Framework structure' for development in Figure 8.2 shows clearly the broad urban design structure that will guide the development. This specifies the broad amount and distribution of open spaces within the station area and those relevant connections to adjoining spaces.

15.22 Within the RSAF, those public space/squares identified as being relevant to this outline application within the 'Northside', is primarily the North Station Square, and a small square/interchange to the west of east/west avenue within the CR11E allocation, adjacent to Caversham Road. In the RSAF, this small square is shown as being located to the north western corner of the adjoining RMG site.

15.23 Christchurch Meadow to the north across the Thames, Kings Meadows to the east and Hills Meadow to the northeast are important areas of open space and great assets to the local area. It is critical that opportunities to integrate the development with these existing areas of open space are taken. The provision of safe movement corridors for walking and cycling will promote opportunities for healthy and active lifestyles for existing and future residents.

15.24 The amount and mix of new development within the two planned sub-areas of the CR11E site allocation means that access to recreational open space, play and sports facilities will be a priority through the creation of the north/south strategic link to Christchurch Bridge and across to Christchurch Meadow.

15.25 The contribution this site makes to the north/south strategic link and the ability of residents within the scheme and in adjoining parts of the CR11E sub-area allocation to easily access the existing nearby areas of open space to the north is heavily reliant upon the quality and directness of the north-south route to be created on this site and the CR11G allocation to the north. As has been seen in this report, there are significant concerns about that route.

15.26 With regard to on-site provision, the application submission material details the delivery of a mix of public and private open space, including children's play space, equivalent to a minimum of 10% of the application site area. This includes all aspects of public realm and the overall composition and quality of which cannot fully be determined until a detailed reserved matter stage.

15.27 The Local Plan contains no prescriptive requirements as to what any one development must provide in respect of open space provision. Any such requirement is expected to be informed by a detailed Open Space Statement. The assessment contained in the submitted and updated DAS considers what nearby open space serves the development. It identifies the site's proximity to Christchurch Meadows to the north, however, it does not adequately consider the requirements generated by the future occupants of the proposed development in its various parameter scenarios, nor the associated provision of new public open space on site. At up to 1,000 dwellings, the impacts could be very significant.

15.28 As this site is over 1ha, the requirements of Policy CR3 are triggered, in that this proposal provide *either* new public open space or civic squares integrated with surrounding development. The RSAF and Local Plan have already identified that both the north and south station squares will act as high quality multi-functional public spaces. These new 'Town Squares' will form gateways to Reading, with the new North Station Square opening up the northern quarter and connects through to the River Thames. Whilst outside of the development site, the proposed North Station Square is likely to be the focal point of the CR11E site allocation in terms of amenity space and as such should include high quality hard and soft landscaping and other features.

15.29 Policy CR3 requires the developer to integrate and consolidate their development and any additional open space provision around the planned North Station Square. At present the north south spine between Plot D and C does not grade or transition from the North Station Square, rather the built form of Plot D encroaches right up to the sites southern boundary with the east/west Avenue proposed to continue past the North Station Square and join Trooper Potts Way as part of the adjoining RMG site as shown on Parameter Plan- Building Plots 17043 PP-102 Rev P2. The parameter plans also allow the building to extend over part of the square from second floor level upwards (shown in green). This is an important part of the site, as it is where the station square meets the north-south and east-west links, as well as the northern interchange. The proposal would cause the development to intrude into this space from a relatively low height, and would reduce the flexibility and usability of that space contrary to policy CR3ii.

15.30 Whilst the inclusion of a modest pocket park to the west along the east/west avenue is welcomed, the failure to consider in detail the open space requirements of the site means there is insufficient evidence to assess whether such modest standalone provision, unintegrated with the wider CR11E allocation and the North Station Square, will make any meaningful contribution the overall need of the occupants. The park is also in a location which does not accord with the RSAF Framework Structure (figure 8.2), which identifies a location at the junction of Caversham Road and the new east-west spine to emphasise this important intersection.

15.31 There is some on site provision of play facilities, although these need to be seen as 'private': they meet neither the Reading standard as set out in the Open Spaces Strategy, nor the more demanding standards for play set out in the national Fields in Trust provision standards, in terms of size, variety and accessibility, and they are effectively 'defended' against use by non-residents of the development by being inaccessible to outsiders.

15.32 Furthermore, it must be recognised that future occupants of the development will be largely reliant upon the North Station Square for open space needs, which for one does not sit within the application site and whose delivery cannot be controlled by the applicant. As described the arrangement of space and layout of the north/south spine does not make any meaningful integration with the proposed North Station Square and fails to demonstrate an imaginative use of open space and the public realm as specifically required by Policy CR3. Finally, no detailed assessments have been made to determine the increased recreational needs and additional pressure placed on Christchurch Meadows to the north.

15.33 In summary, it is accepted that due to the inner urban location of the site, it is highly unlikely that any on-site provision would meet all of the open space needs (particularly for sports and recreational uses) for occupants, as such there would be

an expectation that some off-site contributions will be made towards improvements to nearby Christchurch Meadows, the adjacent Thames Parks and facilitation of the North Station Square. As these existing open spaces are currently well used, and investment would be required to increase capacity in order to accommodate the significant increase in demand directly caused by the introduction of up to 1,000 new residential units.

15.34 A financial contribution towards providing for enhanced public leisure facilities for people of all age groups in the local area, including play, is therefore required to enable off-site open space improvements to mitigate the impact of the development and make the scheme acceptable in Planning terms. At the current time, no such contribution has been proposed by the applicant. The Council's Parks and Leisure team have requested a contribution of £2,500 per dwelling towards the Thames Parks and provision of a safe link towards them. This is based on a now superseded SPD which identified off-site contributions of £2,100 for dwellings of up to 75 sq m and £2,800 for dwellings of more than 75 sq m (without details of dwelling size it will be necessary to assume a figure somewhere in between), but without a detailed Open Spaces Statement that assesses the impact of the development on nearby open spaces, there is no other specific basis upon which to define this in full.

15.35 It is therefore recommended that the failure to deliver high quality open spaces on site through the layout of the development plots, specifically the North Station Square and the small area of open space at the western end of the east-west route, would constitute a reason for refusal, contrary to policy CR3 and the RSAF. Furthermore, it is also recommended that the failure to adequately mitigate the impacts of the development through the provision of sufficient open space and leisure facilities either on-site or off-site, contrary to policy CR3, EN9, CC9 and the Planning Obligations under S106 SPD would constitute a further reason for refusal.

16. Sustainability

16.1 The adopted Sustainable Design and Construction SPD 2019 identifies this Local Plan allocation site (CR11e: North of Station) as part of a 'cluster' which is a potentially suitable location for a town centre heat network scheme. This Council aspiration has since progressed further and it should be noted that the Council is currently progressing the feasibility of a scheme which will centre on sites north and east of the station, including the application site for a heat network, utilising heat from water in the River Thames. Therefore, not only does this Major mixed-use redevelopment site need to follow exemplary sustainable energy principles, it is also a key to delivering this scheme which aims to provide stable, low carbon heat, across a series of major developments in the north-central area.

16.2 The key aspects of the energy strategy for the development have been considered by the Council's Sustainability Manager. It first uses passive high fabric efficiency and low-energy design technologies to reduce energy demand and CO_2 emissions followed by the application of a small amount of low and zero carbon technologies namely a modest size solar PV array. The aspirations in the applicant's strategy and approach are considered to be generally sound, but there are considered to be several areas of uncertainty and inconsistency at this time.

16.3 The 'zero carbon' aspiration and offer of a zero carbon homes offset contribution is a suitable approach, as long as the minimum reduction below Part L of the building regulations is met and the correct approach has been used in respect of building regulations and part L calculations. It should be noted that the building regulation are set to change to the Future Homes Standard in June and this will necessarily change the method that needs to be used to meet the legal minimum. The applicant should work closely with the planning authority to manage this transition to the scheme. The carbon offsetting figures given may not be robust and should be explored further, although this may be able to be addressed by a calculation built into the s106 agreement.

16.4 The Sustainability Manager is concerned by the considerable discrepancy between the reported BREEAM score quoted and the design features underpinning this. This is leading officers to question the robustness of the approach and this could ultimately lead to BREEAM Excellent not being achieved due to scheme design. Whilst this could be dealt with by imposing a condition, this is of concern and would need to be examined further.

16.5 The energy strategy has in the most part given adequate discussion to discounting renewable energy options which are not appropriate. However, insufficient evidence has been supplied to discount the most efficient on-site decentralised energy generation option, GSHP (Ground Source Heat Pumps) which appears to have been dismissed in favour of the applicant's strategy of ASHP (Air Source Heat Pumps), which is a decentralised system proposed to link to any future district heating network. There also appears to be some confusion about the intended CHP approach, which would be unlikely to be compliant with the upcoming building regulations and which is not favoured in the SPD.

16.6 In summary and at this time, the proposal has some outstanding concerns in energy terms and it is questioned whether the strategy merited an update when the application was amended in October 2021. However, the energy strategy has benefits in looking beyond CHP (Combined Heat and Power technology) and linking in with an ASHP system which could potentially link to the proposed Energy Network. On balance however, officers advise that the energy strategy is not considered to be sufficiently robust to be able to be supported by officers. At this stage, therefore, there has been a failure to demonstrate that the application material shows that the development is suitable in terms of sustainable energy and this should form a further reason for refusal. However, officers advise that subject to various appropriate clarifications being received from the Appellant, it may be that this matter is not eventually pursued as a matter (ground) for discussion/examination at the appeal inquiry.

17. Planning Obligations (incl. Affordable Housing)

17.1 Policy CC9, supported by the Planning Obligations SPD (2015), is the overarching policy on securing infrastructure, and makes it clear that developments will not be permitted unless *"infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time."*

17.2 These set out that the following infrastructure types would be given the highest priority:

- Employment, skills and training;
- Transport;
- Open space, green infrastructure and other measures to improve or enhance biodiversity;
- Education; and
- Economic development including employment, skills and training development initiatives and childcare provision.

And where appropriate:

- Energy infrastructure, including decentralised energy projects;
- Health provision; and
- Police Service infrastructure.

And the following where a specific need is identified and justified:

- Community facilities;
- Leisure and cultural facilities;
- Reading Central Area - including public realm and street care enhancements;
- Measures to tackle poor air quality and for on-going monitoring;
- Flood mitigation and prevention measures.

17.3 With respect to affordable housing Policy H3 requires residential development to make an appropriate contribution towards affordable housing to meet the needs of Reading. For sites of 10 or more dwellings the requirement is for 30% affordable housing with the provision to be on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate. The Policy states that:

"*where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution. In determining residential applications the Council will assess the site size, suitability and type of units to be delivered in relation to the current evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent and shared ownership affordable units. The affordable units provided should be integrated into the development.*"

17.4 Further detail on the Council's requirements for affordable housing is set out in the Council's Affordable Housing SPD (2021), along with what detail is required as part of a Viability Assessment.

17.5 As the proposed scheme includes private rented housing as part of the mix, Policy H4 (Build to Rent) is also relevant and requires such to accord with the requirements of Policy H3 with respect to affordable housing provision or in the form of Affordable Private Rent Housing, as defined in the SPD.

17.6 The Applicant has submitted a draft Heads of Terms, and the following table sets out their suggested obligations/ clauses. Officers have considered the impacts which would need to be mitigated and table includes a view on the Applicant's suggestions, below which is a list of further recommended terms, which would have been be sought, had the scheme been acceptable overall.

17.7 In terms of Affordable Housing the Applicant has submitted a Financial Viability Assessment Report (FVA, Savills, Sept 2021), which concludes that there is insufficient viability to support the offer of any affordable housing. Although the Applicant proposes exploring potential opportunities with the Council to secure an affordable housing contribution on a future phased basis. The Assessment is being reviewed by Council appointed consultants BPS, and the results of this will be reported in an update.

17.8 Although, relevant clauses and wording, for inclusion in a S 106 Legal Agreement, would be likely to be resolved through negotiation and agreement, as the scheme is unacceptable overall, negotiation on the required S106 agreement has not been undertaken, and the absence of an agreed and completed agreement forms a further recommended reason for refusal. Subject to the results of the assessment of the FVAR failure to provide policy compliant affordable housing may therefore, also form part of the reason for refusal, and this will be reported in an update.

Applicant suggested Draft S106 Heads of Terms (Oct 2021)	**LPA comments on applicant's proposed heads of terms**
Affordable Housing • 0% affordable housing to be provided in line with viability assessment. • Owner to submit and agree updated viability assessment before [Commencement of Phase 3] • Any affordable housing to be provided on site save where the viability assessment gives rise to a fraction of a unit where this fraction can be paid by way of contribution. • Save for any intermediate build to rent affordable housing (which the Owner may elect to manage), all affordable housing to be disposed of to a Registered Provider. • Standard carveout from affordable obligations for mortgagees, charges or receivers of affordable housing units subject to 3 months marketing of affordable dwellings. • In the event the Development contains 'build to rent' accommodation and any 'build to rent' units cease to qualify as 'build to rent' units, the Owner shall undertake a further viability review to determine whether due to the change in tenure of	The submitted Financial Viability Assessment Report is being reviewed by BPS and will be reported in an update report.

units, a surplus is generated. In the event a surplus is generated a contribution to off-site affordable housing will be payable.	
Highway Works • Owner to enter into a S278 Agreement for Highway Works (works currently TBC). • Owner to submit a schedule for delivery of proposed highway works which shall relate proposed works to phases of the development. • Owner to complete works in accordance with approved schedule.	This stipulates that the applicant is to enter into a S278 agreement and that works are to be confirmed. This is accepted but the Highway works must be determined when access is considered at reserved matters stage, which should be at the first reserved matters stage. Any Highway works would need to be incorporated within a S278/38 Agreement which should be completed within 6 months of the commencement of the development. The approved Highway Works should be completed prior to the first occupation of the development. The same applies in relation to the proposed schedule, this will need to be provided at the first reserved matters stage. Financial contribution for maintenance/ or agreement, via a S142 Highways Licence, to maintain any landscaping within Highway land.
Public Realm Works • Detail of Public Realm to be submitted under RMAs. Owner to deliver public realm in accordance with approved Phasing Plans prior to occupation of the Phase to which the Public Realm relates.	Additional clauses would be required regarding maintaining public access to the public realm and an agreed maintenance regime.

• Standard provisions allowing closure for maintenance and to prevent public realm becoming highway by long user.	
Footpath/Cycleway Enhancements on Vastern Road/ Caversham Road • To safeguard the land potentially required for RBC's footpath and cycleway improvements from development (area of land to be defined by a plan) and if required transfer this area of land to RBC free of charge.	Given that the extent of this land cannot be agreed until access is determined the Highway Authority are content that the extent of land to be transferred until reserved matters stage when access if considered.
Car Parking, Restrictions on Parking Permits, Provision of Car Club Spaces • 10% EV charging to be dealt with by way of planning condition. • S106 to contain prohibition on application of car parking permits. • Owner to submit and have approved Car Club Strategy before occupation of the first Phase containing residential accommodation. • Owner to provide car club spaces in accordance with Car Club Strategy.	The car club strategy should ensure that the car club is funded for a minimum of 5 years and includes the provision of two vehicles.
Travel Plan and Monitoring • Owner to appoint travel plan coordinator before occupation of development. • Owner to submit and have approved travel plan before occupation of first phase. • Owner to update travel plan before occupation of each phase. • Owner to monitor travel plan for 5 years.	The residential travel plan should be submitted to and approved within 5 months of the first occupation of each phase. The residential travel plan should be monitored for a period of 5 years after the final phase has been delivered. A travel plan will also be required for any proposed office use and this will again need to be submitted within 5 months of first occupation but it will need to be monitored for the lifetime of the development.

Local Employment and Training • Owner to either prepare and submit Construction Employment and Skills Plan or pay. • If the Owner elects to pay the Employment and Skills Contribution, the Owner shall pay the Employment and Skills Contribution relating to that phase before Commencement of the relevant phase.	Depending on the final mix of uses there could also be an End User Skills requirement in line with the Employments Skills and Training SPD and Policy CC9.

17.9 In addition The Transport Development Control Manager has suggested the following further obligations:

- *Underpass*
  It is the Highway Authorities view that the railway represents a barrier to north-south movement and effectively blocks cyclists from travelling to and from the south, this would include future residents, staff and customers of the development. Having reviewed the latest Transport Assessment the proposal includes a provision of an additional 724 cycle movements and although not all of these would utilise the underpass it is anticipated that the majority would do so.

  The 2019 cordon data (MHC-251-19 Classified Link Count Pedestrians-Cyclists) for pedestrian cycle movements, and the classified count data (MHC-251-19 Classified Link Count Vehicles), includes the additional on- carriageway cycle data for Trooper Potts Way (the eastern edge of the site). This combined data confirms that there are currently 612 cycle movements in and around Trooper Potts Way with the vast majority likely to be utilising the underpass. Given that the proposal is expected to generate over double the amount of cycle movements above this baseline flow, the development should contribute £200k towards the proposed improvements to facilitate cycle movements through the underpass.

  The underpass works have been subject to an initial feasibility assessment and includes various options all of which equate to a cost in excess of £200k. The works entail removal of the existing roof structure with replacement at a higher level to facilitate cycle movements within the underpass. The improvements to the underpass are simply a case of providing suitable access in much the same way as you would commonly expect for motor vehicles – except in this case the focus is on sustainable modes. This is necessary and site specific.

- *Vastern Road crossing*

  The proposed development will be required, through planning policy, to provide a section of the direct route between Reading Station and the River Thames, which will require an additional crossing facility on Vastern Road. The proposed development as stated above will generate a provision of 724 cycle trips a day as well as 7318 pedestrian trips. A proportion of these will wish to travel north to the River Thames, Christchurch Meadows and further afield into Caversham. The overall costs for the crossing would be in the region of £150,000, and as such

the proposed development should contribute £75,000 towards the delivery of the crossing.

17.10 The following further headline obligation areas are also likely to be requested should adequate justification be forthcoming prior to the appeal in accordance with Regulation 122(2) of the CIL Regulations 2010. This states that *"obligations may only constitute a reason for granting planning permission for the development if the obligation is—*

(a)necessary to make the development acceptable in planning terms;

(b)directly related to the development; and

(c)fairly and reasonably related in scale and kind to the development."

- Phasing
- Zero-Carbon offset
- Provision of pedestrian/cycle route through the site before first occupation and associated infrastructure/signage
- Car parking management – strategy
- Off-site open space contribution
- Education
- Public art
- CCTV
- Decentralised energy
- Monitoring/Legal fees
- Repayment of unpaid monies
- Indexation

18 Planning Balance and Conclusions

Introduction

18.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out the starting point for the determination of planning applications and appeals:

> *"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".*

18.2 The Council is currently able to demonstrate a five-year supply of deliverable housing sites, so the Framework indicates that decisions should apply a presumption in favour of sustainable development and, where the development accords with an up-to-date development plan it should be approved without delay.

18.3 The 2022 version of the NPPF has substantially strengthened national policy on design with paragraph 134 stating that: "*Development that is not well designed should be refused.*"

18.4 Whilst the application is in outline the proposals are explained in detail in the accompanying application documentation and the revised "Planning Application Booklet" (dated October 2021). The Booklet contains the completed application forms, certificates, description of development and "Development Parameter Schedule and Plans". The Development Parameter Schedule and Plans set the maximum extent of development, the land uses and minimum and maximum floorspace proposed. This provides the base for the Environmental Impact Assessment (EIA). It is the applicants [now appellants] view that these provide a mechanism for the Council to control development by imposing a condition to ensure that reserved matters submissions will comply with the Development Parameters. Whist this is correct, the converse also applies, namely, if these documents indicate a form of the development that is likely to be unacceptable at reserved matters submission then it cannot be satisfactorily controlled by condition at outline stage and therefore the only option is to refuse planning permission.

18.5 The Site is included as an allocation under Policy CR11 'Station/River Major Opportunity Area', specifically part of CR11e 'North of Station'. The policy promotes mixed-use redevelopment, to include ground floor uses such as retail and leisure in order to 'activate' streets and the new northern station square. The policy states that upper floors should include uses such as offices and residential. Key aspects of the redevelopment should be to enable a high-quality design with good pedestrian links. Moreover, the Council have a duty under the T&CP Listed Buildings and Conservation Areas Act 1990, as amended, to ensure the setting of listed buildings and conservation areas are not adversely affected by new development, unless the public benefits of such development outweigh the level of harm identified – provided that such harm falls within the 'less than substantial' scale.

Benefits

18.6 The applicants/appellants in their Appeal Statement of Case set out the economic, social and environmental benefits that they consider will arise and should be given considerable weight in support of the scheme.

Economic & Social Benefits

18.7 The scheme would provide up to 1,000 residential units which is a significant number. That said, the Borough has a five-year supply of housing and such a high quantum of housing is not essential to meet the future needs of the borough.

18.8 The site is brownfield, allocated for redevelopment, and is located in a highly accessible and sustainable location immediately adjacent to Reading main line railway station and bus stops. It also has excellent access to local shops and services being part of the wider town centre.

18.9 The provision of housing would deliver a significant New Homes Bonus payments and Council Tax receipts.

18.10 The applicants maintain that the inclusion of a review mechanism within the S106 Agreement to ensure that should viability improve, affordable housing will be delivered to the maximum reasonable amount would be a social benefit of the scheme. However, at the present time Officers are not in a position to accept their viability assessment. On this basis it is currently not possible to conclude on this matter.

18.11 The provision of additional office accommodation and commercial uses will offer benefits to the wider town centre, re-enforcing and enhancing its location as the main commercial centre within the Borough. It will also create a significant number of new job opportunities.

18.12 The proposed scheme will also deliver significant and direct investment into Reading Town Centre. The provision of office accommodation and associated commercial space will increase the attraction of the centre and encourage wider spin off benefits to the centre.

18.13 The provision of residential accommodation will lead to an increase in available expenditure within the immediate area through new residents increasing spend which will benefit local businesses. The commercial/retail floorspace will ensure enhanced access to a range of facilities and services for local residents.

18.14 It is accepted that the scheme will have a positive effect on employment. A range of jobs will be created as part of the construction phase of the proposed development, and operationally in the office and commercial floorspace upon completion. In addition, the S106 Agreement could secure a contribution towards a Construction Phase Employment Skills Programme and end user phase agreement.

Environmental Benefits

18.15 The proposed re-development of this under-utilised brownfield site has the potential to enhance the overall attractiveness of Reading Town Centre and deliver significant environmental benefits to the local area including a high-quality link from the north (Caversham) to the town centre as required by the Local Plan and the RSAF.

18.16 However, for the reasons set out in the report earlier and summarised in the harms below, officers consider that the scheme, as presented, fails to achieve this potential, by failing to demonstrate the satisfactory delivery of environmental protection and enhancements.

18.17 In summary, and contrary to the assertions of the applicants, Officers consider that the development parameters and conditions put forward will fail to deliver a modern, high-quality sustainable design and as a result it would be a harmful architectural addition to Reading.

18.18 In respect of the transport and highway aspects of the proposal it is concluded that the proposal is likely to have a positive impact on the highway network because of a reduction in vehicular movements compared to the existing use, and the site would be in a very sustainable location with respect to its access to a range of modes of transport.

Conclusion on Benefits

18.19 Officers conclude that whilst there would be some economic and social benefits – there will be limited environmental benefits. In fact, the scheme as presented, will fail to meet the high-quality design aspects of environmental objectives and it is therefore inconsistent with meeting the three dimensions to sustainable development as set out at paragraph 8 of the NPPF and this is a matter that goes to the heart of 'sustainable development'.

<u>Harms</u>

Layout, routes, and integration - the North-south link

18.20 The site forms part of sub-area CR11e where policy requires explicitly that: *"A high-quality route incorporating a green link should be provided through to the Thames"*. The link is strategic and is essential to the broader strategy for the area. It is the main priority for this site and is, therefore, central to the success of the Local Plan as a whole, the Reading Central Area, the Station/ Riverside Area and the Riverside allocated site.

18.21 The overall success of the north/south spine from the Town Centre to the River is dependent upon each section or link playing its full part, including the connection through the application site. This route should be direct, with a direct line of sight between the station square (north) and the River Thames. The proposed link is not fully fit for purpose because it does not allow for the route alignment to vary in

response to the final form of the development of the SSE site to the north. The potential future alignments can be successfully accommodated within the confines of the site boundary but not within the Parameter Plans as currently drafted.

18.22 Officers recognise that the Parameter Plans broadly follow the orientation shown on diagrams in the RSAF and local plan. However, it does not, and possibly cannot take account of the future development of the CR1g site. This would, in turn, lead to a heavily compromised north-south route through the area, which would fundamentally conflict with one of the overarching movement priorities.

18.23 Therefore, the development as proposed may prevent the achievement of the high-quality north-south pedestrian and cycle link. Since the link is an essential requirement of policy for this area, a failure to provide a satisfactory alignment for the connection through the site such as that this compromises the route is contrary to policy.

Scale, height, and massing

18.24 Whilst the proposed development has scale as a Reserved Matter, the Parameter Plans to be approved at this outline stage propose development plot dimensions, the maximum buildings heights for each plot (or part thereof) and the minimum distances between plots. Therefore, the Council must consider whether it is appropriate for development to rise to these heights on the parcels proposed.

18.25 It is considered that the proposed heights contradict RSAF guidance and that the three-fold approach to density, height and mass set out in the RSAF has not been followed. Therefore, the combined effect of the proposed height, density and mass of the proposed scheme is considered unacceptable.

18.26 The proposals fail to relate positively and appropriately to local character and the context of the Site to the detriment of the visual amenities of the area and fail to deliver a development of the highest quality in relation to its context. The Applicant has not justified these many exceptions to guidance. The illustrative scheme set out in the DAS is insufficiently convincing on these matters to offset the concerns raised. The proposed scope and depth of the Parameter Plans and the Design Code appear insufficient to exercise satisfactory control at the reserve matter stage.

18.27 The northern and western benchmark heights of Plot A, B and C do not suitably reduce in height on the Vastern Road/Caversham Road frontage. They don't relate well to the established heights of existing development to the west, thereby conflicting with the aim of Policy and guidance, which advises that development should carefully consider the interfaces and settings of smaller-scale residential buildings. For Plot C and D, the mass and width - combined with the proposed oversailing of the adjacent public realm of Plot D - are likely to result in overly bulky buildings, eroding the visual gaps in between. Therefore, it is unclear how the proposed height and massing of Plots C and D will successfully fit into the envisaged urban grain of this part of the RSAF area and the CR11E site allocation.

18.28 In summary, the proposed heights of the development contradict RSAF guidance, and the three-fold approach to density, height and mass set out in the RSAF has not been followed. It is therefore concluded that the combined effect of the proposed height, density and mass of the proposed scheme is unacceptable. The reasons for any exceptions to this policy approach have not been fully justified, whilst the Illustrative

Scheme (DAS Chapter 6) raises significant concerns that the development in accordance with the Framework and Design Code will result in harm.

18.29 It is considered that the heights of Plots A, B and C fail to relate to the established heights of existing development to the west; and that for Plots C and D, their mass, width and height along with the proposed oversailing of Plot D over the public realm will harm the setting and character of the Station/River MOA. As such, the proposals fail to relate positively and appropriately to local character and the context of the site to the detriment of the visual amenities of the area and fail to deliver a development of the highest quality in relation to its context and therefore the identified harms arising from all 4 buildings will be contrary to Policies CR2, CR3, CC7, CR10(a), CR11 and CR11e, the RSAF and National Design Guide.

Setting/Views

18.30 In respect of the proposals it is considered that:

- The view along Station Road towards the Station Square and its Clock tower is of strategic importance to the town's image.
- They will harm this high-quality view and detract from Reading's skyline by crowding views of the Station Clock Tower with detrimental impacts upon the existing public realm.
- They offer bulky and overly dominant massing with few visible gaps between buildings and a failure to offer a sympathetic composition of tall buildings gathered around views of the Station and clock tower.
- The upper storeys will be bulky with no setbacks or modelling of the building silhouette (and few controls offered in the Design Code to limit this).

18.31 The submitted ES (View 25) fails to appreciate the view's significance, mistakenly claims the view is not recognised in the RSAF and overlooks the height and massing controls in Chapter 6 that specifically reference the areas of special control over tall buildings in Figure 6.1. As a result, the ES fails to properly assess the scale of harm the development at its maximum height limits will cause.

Heritage

18.32 The cause of harm to the Main Building of Reading General Station, the Market Square/London Street Conservation Area and the Town Council Chamber derives from the scale and massing of the proposals and how this affects the appreciation of designated heritage assets. The application site is identified in both the Reading Station Area Framework and the Reading Tall Buildings Strategy as a suitable location for tall buildings. Notwithstanding this, the RSAF requires that proposals have no adverse impact on historic assets and their settings (policy CS33). Similarly, the Reading Tall Buildings Strategy requires that "All tall buildings proposals should … avoid detrimental impacts upon conservation area and listed buildings" (S 6.3 General Principles).

18.33 NPPF: Paragraph 202 requires that *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"*.

18.34 In the case of the Main Building of Reading General Station, the Market Place/High Street Conservation Area and the Town Council Chamber the proposals will create a degree of less than substantial harm (moderate, low and very low respectively) to their significance. As set out in the applicant's own Heritage Statement, Historic England recommends that where harm is identified, consideration should be given to options that might reduce or mitigate that harm. Even though the applicant's own assessment has concluded a degree of harm to a number of heritage assets no evidence has been provided to indicate that attempts have been made to reduce the harm.

18.35 Great weight should be applied to the harm to designation heritage assets and this balancing exercise is undertaken elsewhere in this report.

18.36 Policy EN1 of the Local Plan is consistent with the NPPF, expecting developments to avoid harm to heritage assets in the first instance and requiring that any harm is justified, often in the form of public benefits. No evidence has been provided to indicate that attempts have been made to reduce the harm. Great weight should be applied to the harm to designation heritage assets and this balancing exercise is undertaken elsewhere in this report.

18.37 Policy EN4 of the local plan requires development to conserver the significance of local important heritage assets. Only one locally listed building, 55 Vastern Road, has the potential to be affected in this manner but it derives little value from its setting and its significance will be preserved.

18.38 Policy EN5 states that new development should not harm and where possible should make a positive contribution to views of acknowledged historical significance and is explicit that the list of 9 views itemised in the policy is note exhaustive. It makes particular mention of other views within conservation areas or the station area. The proposals will harm views of the Main Building of Reading General Station and the view up Duke Street/High Street as set out above.

18.39 Policy EN6: This policy is focused on new development in a historic context. The nature of the proposal site is such that this policy becomes relevant largely due to the scale of development: the scale of buildings means that the relevant context is far broader than site and its immediate neighbours. No information has been provided to indicate how the proposals respond positively to the historic environment or how this has informed or shaped the new development. The assessment above has demonstrated that the proposals do not make a positive contribution to the historic townscape.

18.40 Therefore, by virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station, the Market Place/London Street Conservation Area and the Town Council Chamber. This harm caused to the significance of these designated heritage assets must now be weighed against the benefits of the proposal.

18.41 As set out in the section titles 'Benefits' some limited economic, social and environmental benefits of the proposals have been identified but it is considered that the public benefits of the scheme are not of sufficient weight to outweigh the varying levels of less than substantial harm to a number of heritage assets.

Public Realm

18.42 The proposed siting of development plots, the public realm and vehicular access arrangements at the interface of the Development with Vastern Road, Caversham

Road, and the remainder of the CR11e Allocated Site Station (including Square North) fail to maximise and secure high-quality public realm, make the most efficient use of the site, achieve effective permeability, and fail to adopt a comprehensive approach to the development of the Allocated Site as a whole.

Flood Risk and Drainage

18.43 As set out in Chapter 9 Officers are currently awaiting a response from the EA following further information provided by the applicants seeking to address their initial concern's with regard to the proposed flood storage areas. The need to address all flood risk issues is a requirement to make the development acceptable and therefore would not be a benefit. If the EA remain concerned then this would be a harm but at the time of writing this report Officers are not aware of the EAs final view. It is hoped that their view will be known before this report is considered by members.

Trees, Landscaping and Ecology

18.44 As set out in Chapter 10, the Natural Environment Officer has a number of concerns with respect of trees and the landscaping proposals. The conclusion is that based on the parameter plans and Design Code, that the landscaping principles sought for the site, as set out in para. 10.11 above, could not be achieved, along with the issues identified with regard to trees and landscaping set out at 10.17, that the proposal would not comply with the relevant national, local policies and guidance and this therefore, is an identified harm which justifies a reason for refusal.

18.45 In respect of ecology, officers consider that overall, biodiversity enhancements could potentially be satisfactorily achieved with conditions requiring submission and approval of details, relating to biodiversity enhancements, boundary treatments, lighting and a Construction Environmental Management Plan, appropriately worded for a phased development, at the reserved matters stage.

Daylight and Sunlight

18.46 It is the evidence of BRE that the loss of daylight to the front rooms of 17-51 Caversham Road would be a major adverse impact. The cumulative assessment has not considered loss of daylight to the RMG site and the scheme pending consideration, or loss of daylight and sunlight to the SSE site across Vastern Road. These should have been addressed in the Environmental Statement. A large number of living rooms in the proposed development are predicted to have limited daylight. CHP Surveyors have analysed worst case rooms on the lower floors of Blocks B and C. With the RMG scheme in place, 79 (44%) of these 177 living rooms would not meet the minimum recommendation for daylight provision. For bedrooms, compliance rates are better with just 14 not meeting the recommended 1%. Sunlight provision in these rooms on the lower floors would be poor, with just 21 (12% of 180) living rooms and studios analysed meeting the BRE/BS sunlight recommendations with the RMG scheme in place.

18.47 On this basis, Officers consider that harm arises on the grounds of loss of daylight to existing residents and also that the applicants have not demonstrated whether acceptable living conditions (daylight and sunlight) could be achieved in the new development.

Wind

18.48 Officers consider that the application has to be considered on the basis of the evidence provided to the Council. It is therefore considered that the predicted wind conditions would be so bad that the mitigation measures set out in the ES would not be sufficient to provide the required level of mitigation. Accordingly, until these issues are adequately addressed, it is Officers view that planning permission should be refused on the basis of conflict with policies CC3 and CC8.

Open Space

18.49 As set out in Chapter 15 it is considered that the proposal fails to deliver high quality open spaces on site through the layout of the development plots, specifically the North Station Square and the small area of open space at the western end of the east-west route, would constitute a reason for refusal, contrary to policy CR3 and the RSAF. Furthermore, it is also recommended that the failure to adequately mitigate the impacts of the development through the provision of sufficient open space and leisure facilities either on-site or off-site, contrary to policy CR3, EN9, CC9 and the Planning Obligations under S106 SPD would constitute a further reason for refusal.

Sustainability

18.50 Based on the information provided to date, Officers have some outstanding concerns in energy terms. Whilst the energy strategy has benefits in looking beyond CHP (Combined Heat and Power technology) and linking in with an ASHP system which would appear to link well with the proposed Energy Network, it is not considered to be sufficiently robust enough to be able to be supported by officers. At this stage, therefore, there has been a failure to demonstrate that the application material shows that the development is suitable in terms of sustainable energy and this should form a further reason for refusal.

<u>Conclusions</u>

18.51 The application is required to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance the harmful impacts of the proposed development and the failures to meet all relevant policy requirements need to be weighed against the benefits of the proposed development.

18.52 Whilst the development would therefore appear able to fulfil some aspects of the three dimensions to achieving sustainable development as set out within the NPPF, it is considered to result in very limited environmental benefits, with Officers identifying major concerns in respect of numerous design related issues.

18.53 For the reasons set out in the detailed analysis of benefits and harms above, it is considered that in this particular instance, the identified material benefits of the proposal are not considered to be of such weight to outweigh the harms caused by the inherent conflicts with the policies of the development plan arising from the proposed development.

18.54 In undertaking this detailed assessment of the proposals throughout this report, based upon the documentation provided by the applicants, Officers conclude that notwithstanding this is an outline application, the parameters plan and other documentation establish clear parameters for the proposed development, and based

upon these it is not considered that any of the concerns arising from the main issues identified can be satisfactorily addressed through the imposition of conditions.

18.55 For these reasons Officers conclude that had they been in a position to recommend a decision on the application, it would have been that it should be refused for the reasons set out at the beginning of this report.

19. Equality Impact Assessment

19.1 When determining an application for planning permission the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the proposed development.

Officer: Brian Conlon/Alison Amoah