

I recommend a condition is attached to any consent requiring a noise assessment to be submitted prior to commencement of development and any approved mitigation measures implemented prior to occupation to show that recommended noise levels in the table above can be met.

The noise assessment will need to identify the external noise levels impacting on the proposed site.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.

I recommend the following condition.

➤ ***N9 NOISE ASSESSMENT & MITIGATION RESIDENTIAL (TO BE SUBMITTED)***

No development shall commence on site until a detailed scheme, informed by an assessment of the current noise environment, for protecting the dwellings from the external noise environment of the area has been submitted to and approved, in writing, by the Local Planning Authority. The scheme itself shall be designed, specified and constructed so that the sound insulation performance of the structure and the layout of the dwellings are such that the indoor ambient noise levels do not exceed the values detailed in Table 4 of BS 8233:2014 and the and that the individual noise events do not exceed 45 dB LA,max,F more than 10 times a night. Where opening windows will lead to an internal noise level increase of 5 dBA or greater above BS 8233:2014 recommended internal levels, the scheme shall include provision of alternative mechanical ventilation with minimum performance equivalent to a mechanical heat recovery (MVHR) system with cool air bypass as an alternative means of cooling and ventilation. Noise from the system should not result in BS8233 internal levels being exceeded.

Thereafter, the development shall not be carried out other than in accordance with the approved scheme which shall be completed before any part of the accommodation hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing.

REASON: These details are required due to insufficient information being contained within this submission and in order to safeguard the amenity of occupants in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

Noise between residential properties - sound insulation of any building

Informative

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

Noise - delivery hours / waste collections/ opening hours

I have concerns about the potential for noise disturbance due to deliveries and/or waste collections and/or commercial operations on occupants of nearby residential properties, particularly late at night and early morning, so a restriction on permitted hours for these activities is recommended. Hours are to be agreed at a later stage.

➤ N17 HOURS OF DELIVERIES/WASTE COLLECTION

Hours for deliveries and/or waste collection are restricted to [INSERT START TIME] to [INSERT FINISH TIME] on Mondays to Saturdays and [INSERT START TIME] to [INSERT FINISH TIME] on Sundays or Bank Holidays.

REASON: In order to protect local residents from unreasonable disturbance arising from the use in accordance with Policy CC7 and CC8 of the Reading Borough Local Plan 2019.

➤ N16 HOURS OF OPENING/OPERATION

The premises shall not be used by members of the public outside the hours of [INSERT START TIME] to [INSERT FINISH TIME] on Mondays to Saturdays and [INSERT START TIME] to [INSERT FINISH TIME] on Sundays or Bank Holidays.

REASON: In order to protect local residents from unreasonable disturbance arising from the use in accordance with Policy CC7 and CC8 of the Reading Borough Local Plan 2019.

Noise generating development

Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014+A1:2019 methodology. I recommend the following condition.

➤ N2 MECHANICAL PLANT (NOISE ASSESSMENT REQUIRED)

No mechanical plant shall be installed until a noise assessment of the proposed mechanical plant has been submitted and approved by the Local Planning Authority. The assessment shall be carried out for in accordance with BS4142:2014+A1:2019 methodology. The predicted specific sound level (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise-sensitive facade shall be at least 10dB below the pre-existing background

sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The predicted rating level, LAr,Tr (specific sound level plus any adjustment for the characteristic features of the sound) as measured at a point 1 metre external to the nearest noise-sensitive façade (habitable window of a dwelling) shall not exceed the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The plant shall thereafter only be installed in accordance with the assessment and shall thereafter be maintained so that it operates to the same standard.

REASON: To safeguard the amenities of the adjoining premises and the area generally, in accordance with Policy CC8 and EN17 of the Reading Borough Local Plan 2019.

Insufficient information to determine the application:

Kitchen Extraction - odour

In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the EMAQ guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (Sept 2018) or the (withdrawn) DEFRA version (Jan 2005).

➤ N11 VENTILATION & EXTRACTION (TO BE SUBMITTED)

No development shall commence on site until an odour assessment has been carried out and a detailed odour management plan to include scaled plans, odour control specifications and a maintenance plan has been submitted to and approved in writing by the Local Planning Authority. Reference shall be made to the EMAQ guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (Sept 2018) or the (withdrawn) DEFRA version (Jan 2005) when assessing potential odours and selecting appropriate odour control methods. When assessing potential odours, the assessment shall consider the full range of cooking types that may be conducted under the permitted use. Thereafter, the development shall not be carried out other than in accordance with the approved scheme unless otherwise agreed in writing by the Local Planning Authority.

REASON: These details are required due to insufficient information being contained within this submission and to safeguard the amenity of adjoining properties and to protect the general environment in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

Air Quality - Increased exposure

The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (may

breach the EU limit value for NO₂) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.

Where the assessment shows that residents will be exposed to harmful levels of pollutants (in excess of national objective levels) the applicant will need to produce a mitigation plan. The mitigation plan must quantify the impact on emissions the proposed mitigation will have, in order to show that future occupants will be protected from the effects of poor air quality.

One method of protecting future occupants is by setting a development back from the source of pollution. Where the development involves converting an existing building and allowing a buffer zone is not an option it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.

Mitigation against increased exposure:

- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones - consider increasing distance of the building façade from very busy roads
- Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
- Mixed use - locate any sensitive uses on higher floors, allowing commercial use on lower elevations
- Balconies - consider avoiding use in areas of exceedance, especially on ground and first floor level
- Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants
- Green Infrastructure - Installation of green walls, roofs, or planters.

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

Until an [assessment and / or mitigation plan] has been submitted and approved by the Environmental Protection Team it is impossible to determine whether the proposed development is appropriate for the proposed location, therefore until the above has been received I would recommend **refusal** on air quality grounds or the following condition.

➤ ***N13 AIR QUALITY ASSESSMENT AND MITIGATION (TO BE SUBMITTED)***

No development shall commence on site until a detailed Air Quality Assessment to determine whether mitigation is required to protect the residents from the effects of poor air quality is submitted to and approved in writing by Local Planning Authority. Where this Air Quality Assessment identifies that future residents will be exposed to poor air quality, an air quality mitigation scheme shall accompany this assessment demonstrating sufficient mitigation to protect the occupants. The scheme shall be implemented as approved prior to occupation of any part of the development and retained as approved at all times thereafter.

REASON: These details are required due to insufficient information being contained within this submission and in order to protect the health of future occupants of the proposed development in accordance with Policy EN15 of the Reading Borough Local Plan 2019.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedence of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM_{2.5} and PM₁₀).

The proposed development (large scale) is located within or adjacent to an air quality management area and has the potential to increase emissions. An assessment should be provided as part of the application.

Where any increase in emissions is identified a mitigation scheme must be submitted. The mitigation scheme must quantify the emissions saving that it will bring about, in order to prove that the detrimental effect of the development can be offset.

Mitigation against increased emissions:

- Provision of cycling facilities / residents cycles

- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Improvements to local public transport
- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered
- Mitigation through design, improved air flow around development, alternative plant

It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, or be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

An air quality action plan has been implemented to try and reduce levels of NO₂ in this area. The proposed development will lead to an increase in [NO₂ levels / vehicle movements / HGV movements / Other] directly conflicting with the RBC air quality action plan.

It is therefore necessary for the applicant to demonstrate through an air quality assessment and mitigation plan how it intends to reduce the impact of the proposed development.

Until an assessment and mitigation plan has been submitted and approved by the Environmental Protection Team it is impossible to determine whether the proposed development is appropriate for the proposed location, therefore until the above has been received I would recommend **refusal** on air quality grounds.

If refusal is not thought to be a viable option then the below condition is recommended.

Recommended Condition

➤ N15 AIR QUALITY ASSESSMENT (TO BE SUBMITTED)

No development shall commence on site until an Air Quality Assessment to determine whether the proposed development will result in a worsening impact on air quality has been submitted. The assessment must use a full dispersion model to

predict the pollutant concentrations at the building façade for the proposed year of occupation as well as any impacts during the development phase. The input parameters used in the assessment must be in accordance with current best practice. Where the assessment identifies a worsening of air quality, a mitigation plan shall be submitted to and approved in writing by Local Planning Authority. The mitigation plan must quantify the impact on emissions the proposed mitigation will have, in order to demonstrate that any detrimental impact from the development will be offset. Thereafter, the development shall not be carried out other than in accordance with the approved mitigation scheme, which shall be implemented before any part of the development is occupied.

REASON: These details are required due to insufficient information being contained within this submission and in order to protect the health of borough residents in accordance with Policy EN15 of the Reading Borough Local Plan 2019.

Contaminated Land

The development lies on the site of previous historic uses which have the potential to have caused contaminated land. The proposal may introduce new pollutant linkages between contaminated land and sensitive receptors at the site.

The developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.

A contaminated land assessment should be submitted to give an indication as to the likely risks and to determine whether the site is suitable for the proposed use or can be made so by remedial action.

See recommended conditions below, these are required to ensure that future occupants are not put at undue risk from contamination.

Recommended conditions

➤ CO3 CONTAMINATED LAND ASSESSMENT (TO BE SUBMITTED)

No development shall commence on site including demolition and any preparatory works until an assessment of the nature and extent of contamination has been submitted to and been approved in writing by the Local Planning Authority. This assessment must be undertaken by a competent person, and shall assess any contamination on the site, whether or not it originates on the site. Moreover, it must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:

- human health,

- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

REASON: These details are required due to insufficient information being contained within this submission and to ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

➤ **CO4 REMEDIATION SCHEME (TO BE SUBMITTED)**

No development shall commence on site including demolition and any preparatory works until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and been approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, an appraisal of remedial options, and proposal of the preferred option(s), and a timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

REASON: These details are required due to insufficient information being contained within this submission and to ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

➤ **CO5 REMEDIATION SCHEME (IMPLEMENT AND VERIFICATION)**

The approved remediation scheme under Condition **INSERT** shall be implemented in accordance with the approved timetable of works. A validation report (that demonstrates the effectiveness of the remediation carried out) shall be submitted to and approved by the Local Planning Authority before construction above foundation level.

REASON: To ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

➤ **CO6 UNIDENTIFIED CONTAMINATION**

In the event that contamination is found at any time when carrying out the approved development not previously identified, development shall be halted on that part of the site the contamination reported in writing to the Local Planning Authority.

An assessment of the nature and extent of contamination shall be undertaken and where remediation is necessary a remediation scheme, together with a timetable for its implementation, shall be submitted in writing to the Local Planning Authority for its written approval.

The measures in the approved remediation scheme shall be implemented in accordance with the approved timetable. Halted works shall not be re-commenced until the measures identified in the approved remediation scheme have been completed and a validation report has been submitted to and been approved in writing by the Local Planning Authority.

REASON: To ensure the development is suitable for its end use and the wider environment and does not create undue risks to occupiers of the site or surrounding areas in accordance with Policy EN16 of the Reading local Plan 2019.

Light

I have concerns about the proposed external lighting resulting in loss of amenity to nearby residents. Insufficient information has been provided in order for me to assess whether the proposed lighting scheme is likely to adversely impact on nearby residents.

Details should be submitted; this information should include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles) and an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00). The plans should neighbouring buildings so that the predicted impact on them can be assessed. The applicants should demonstrate that light levels will not exceed the relevant guidance lux levels specified in the table below. Information should also show how glare will be controlled.

Environmental Zone - Brightness	Light trespass (into windows) Ev [Lux]	
	Pre-curfew (before 23:00hrs)	Post-curfew (after 23:00hrs)
E3 - Suburban	10	2
E4 - Urban	25	5

Institute of Lighting Professionals : Guidance Notes for the Reduction of Obtrusive Light GN01:2011

Recommended condition

➤ ***N19 EXTERNAL LIGHTING (TO BE SUBMITTED)***

Prior to first occupation or the use first commenced, full details of all external lighting to be installed within the development shall be submitted to and approved in writing by the Local Planning Authority. The details shall include a plan indicating the locations of the lights, specifications, height, luminance; lens shape/beam pattern and orientation, any hoods/shades, and an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00) and showing neighbouring buildings. The details shall demonstrate that light levels will not exceed the relevant guidance lux

levels specified in the Institute of Lighting Professionals : Guidance Notes for the Reduction of Obtrusive Light GN01:2011 and shall also demonstrate how glare will be controlled. The approved scheme shall thereafter be installed before first occupation of the buildings or use commenced and the external lighting shall thereafter be maintained and operated in accordance with the approved details.

REASON: In order to protect the privacy and amenity of adjoining and future occupiers and enhance the appearance of the development in accordance with Policy CC7 and CC8 of the Reading Borough Local Plan 2019.

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Recommended conditions

➤ ***C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)***

No development shall commence on site, including any works of demolition, until a site specific Construction Method Statement has been submitted to and been approved in writing by the Local Planning Authority. The Statement shall provide for

- a) Required measures to control the emission of dust, dirt and other airborne pollutants during demolition and construction; [EP REQUIREMENT]
- b) Provisions to be made for the control of noise coming from the site during demolition and construction; [EP REQUIREMENT]
- c) Full details of pest control measures following any demolition required. Where necessary, capping of drains/sewers and baiting arrangements. [EP REQUIREMENT]

The measures within the approved Statement shall be adhered to throughout the demolition and construction period unless otherwise agreed in writing by the Local Planning Authority.

REASON: These details are required due to insufficient information being contained within this submission and in the interests of protecting the amenity of local land uses or neighbouring residents, the character of the area and highway safety in accordance with Policy CC8 and TR3 of the Reading Borough Local Plan 2019.

➤ ***C1 HOURS OF CONSTRUCTION/DEMOLITION***

No construction, demolition or associated deliveries shall take place outside the hours of [0800hrs to 1800hrs] Mondays to Fridays, and [0800hrs to 1300hrs] on

Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior written approval from the Local Planning Authority.

REASON: In order to protect occupiers of nearby properties from unreasonable disturbance from works connected with implementing this permission in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

➤ **C4 NO BONFIRES**

No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development hereby approved shall be burnt on site.

REASON: In the interests of air quality, the amenity of neighbours, and to promote more sustainable approaches to waste management in accordance with Policy CC8 of the Reading Borough Local Plan 2019.

Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. I recommend the following condition.

➤ **Condition - Details of bin stores**

No [dwelling/development] hereby permitted shall be first occupied until details of refuse and recycling bin stores have been submitted to and approved in writing by the Local Planning Authority. The details shall include measures to prevent pests and vermin accessing the bin store(s). The approved bin storage, including pest and vermin control measures, shall be provided in accordance with the approved details prior to first occupation of any permitted [dwelling/development] and shall not be used for any purpose other than bin storage at all times thereafter.

Reason: To ensure that adequate provision is made for the storage and collection of refuse in accordance with Policy CS2 of the Reading Borough LDF Core Strategy 2008 (Altered 2015) and Policy DM12 of the Reading Borough LDF Sites and Detailed Policies Document 2012 (Altered 2015).

If you have any queries please contact me.

Kind regards,

Rebecca Moon -
Senior Environmental Health Officer