



Marie Jasper  
Planning Director  
Barton Willmore  
Via Email

**Advice without prejudice**

Francis Martin  
Head of Development Economic  
& Neighbourhood Services  
Civic Offices, Bridge Street,  
Reading, RG1 2LU

Civic Centre, Reading, RG1 7AE  
☎ 0118 9373787

Our Ref: 190513

Direct: ☎ 0118 9373 859

e-mail: [brian.conlon@reading.gov.uk](mailto:brian.conlon@reading.gov.uk)

6 December 2019

Your contact is: **Brian Conlon, Planning & Building Control**

TOWN AND COUNTRY PLANNING ACT 1990

**Enquiry Reference: 190513/PREAPP**

**Address: Reading Station Retail Park**

**Pre-application: Application for demolition and redevelopment, with all matters reserved for future determination and to be in accordance with the approved Development Parameters, for a range of uses comprising: Residential (Class C3); Offices (Class B1(a)); Hotel (Class C1); Retail (Class A1,A2,A3,A4,A5 and AA); Assembly and leisure (Class D1); Non-residential institutions (Class D2); vehicle parking, vehicle/pedestrian/cycle access and through routes, landscaping, public realm/open space, drainage, services, and other associated works.**

Dear Ms Jasper,

Since our meeting on 12th September 2019, the Council has been acutely aware of both the gathering interest in the Reading Station Retail Park site (RSRP) and that of other strategic sites located around Reading Station currently pending determination. As a result of the public exhibition held, information concerning your proposal is now in the public domain.

In the absence of any minutes provided from our last meeting held at The Blade on 12th September 2019, I feel this is an appropriate opportunity to provide you with an interim assessment as to what the authority feels are the main strategic issues with this development proposal. This response comes in light of your recent submission of the draft Development Parameters Schedule (Oct 2019), adoption of the New Local Plan (Nov 2019) and finally the release of the Government's National Design Guide (Nov 2019). Furthermore, it is likely the policy and legislative landscape will continue to evolve following the general election on 12th December 2019.

The following advice has also been taken in tandem with a wider detailed and coordinated assessment of other development parcels outside of your clients' ownership. These make up the particular site allocation in the new local plan (CR11e, NORTH OF STATION) and directly adjoin it in neighbouring site allocations both north and south of the railway station. Whilst it is hoped the following feedback will prove useful in informing your approach to this particular site, the lack of detail currently available to the Council means the advice contained within this response cannot and does not attempt to cover all relevant issues applicable to such a scheme. However, it is hoped it forms a useful guide to those strategic issues we consider important in any further pre-app discussions.

## **1. Context**

The new Local Plan contains an updated approach to some of the town's largest and most strategic sites against the backdrop of the Government's new National Design Guide (November 2019) which specifically helps to inform development proposals and their assessment by Local Planning Authorities. Both are underpinned by paragraph 130 of the National Planning Policy Framework which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. In parallel with the new local plan is the Council's climate emergency declaration (Feb 2019) and commitment to ensure sustainability is at the heart of decision making.

For the RSRP site, like those land parcels adjoining it and being built out within the immediate area, the Local Authority is keen to understand how the site's current policy and development context and relationship has successfully influenced its layout, form, appearance and details.

The context of the RSRP site is of paramount importance and is evidently changing. The most influential being the upgraded railway station, Former Royal Mail site to the south (RMG), Station Hill beyond that, and the Former SSE site to the north (SSE). This context and the need for site allocation CR11e to perform a number of fundamental immediate, local and regional objectives are acutely recognised. For this scheme to be successfully brought forward and supported by the Local Planning Authority, it will need to demonstrate it has a sound understanding of the features of the site and its surrounding context as identified by Policy CR11: STATION/RIVER MAJOR OPPORTUNITY AREA within the new Local Plan, the individual site allocations contained within this policy and the Reading Station Area Framework (RSAF) masterplan which remains the key drivers of realising the Station/River Major Opportunity Area (SRMOA).

In responding positively to the surrounding context beyond the site boundary, the scheme will need to demonstrate through the design that it has worked in collaboration with adjoining sites in separate ownership (namely The RMG site and the SSE site) to create a positive environment and actively avoid replicating negative features which already exist in the immediate area. Key to this is actively responding to the access, movement and accessibility priorities of CR11 in the Local Plan and RSAF, the unique pattern of uses and activities which occur north of the station and integrating into and reinforcing existing physical infrastructure already built. For example the station underpass, the new pedestrian/cycle bridge over the River Thames and the Council initiative to significantly enhance the town centre's movement corridor along the north/south axis (for sustainable forms of movement) are all key anchors of the RSAF and Policy CR11 of the Local Plan. This will involve the layout and pattern of built form responding to the prevailing pattern of streets and routes, but taking the opportunities to create movement routes and spaces that are fit for purpose and realise the clear intention of the SRMOA and the principles of the RSAF.

## **2. Movement and access,**

## a) Movement

Fundamental to the layout of all land north of station is the Council's objective to create a series of effective access and movement corridors both north/south to the river, northwest to the Caversham Road roundabout, and the wider movement network beyond. In particular, this site is recognised as the primary facilitator in creating a high quality north-south street that allow greater pedestrian and cycle movement from the station to Vastern Road, across Vastern Road through the SSE site to the river, and across the pedestrian and cycle bridge to Caversham beyond.

With the declared climate emergency at the top of the authority's agenda and enhanced sustainable movement aspirations now contained within the local plan, all site allocations north and south of the station must contain ambitious proposals to fulfil their respective obligations in creating a direct and desirable movement network. Given its central location and proportion of land involved, there is an uncompromising need for the RSRP development to provide a realistic and desirable alternative to allow cyclists and pedestrians to avoid the often overcrowded, unpleasant and dangerous Caversham/Vastern Roads/IDR, roundabouts and respective road bridges crossing the Thames northwards.

Key design and policy documents such as NPPF, PPG, the DFT's Manual for Streets (its basic principles embraced within the NPPF and PPG), the Government's National Design Guide (2019), the Design Companion all publically promote feasible street designs suitable to such routes into and out of key transport nodes. The PPG specifically states that streets should, *"reflect urban design qualities as well as traffic management considerations, and should be designed to accommodate a balanced and locally appropriate mix of movement and place based activities."* There is a need to consider what people should be able to do in the new streets created by this scheme, not what they currently do or what would simply constitute an improvement in current activities. Making a clear and realistic distinction between movement functions and place function will prove essential.

Pre-application discussions to date have focused around uninspiring commitments to a shared pedestrian/cycle route north of the Northern Station Square to Vastern Road crossing; thereby merging both movement and place. The 'movement' success of such any such route will depend heavily on its direct connectivity and usability by those starting and terminating their journey at the station or travelling through the station underpass to or from the town centre. With pedestrian needs inherent to any street design as a minimum, we expect direct and easy access from the new station square onto designated cycle routes that primarily avoid (and if not minimises) any opportunity for conflict with both pedestrian and vehicular users (i.e. those enjoying the 'place aspect'). The success of this strategy will be heavily dependent on the delivery of high quality, direct, convenient and safe cycle routes that link with existing routes beyond the site boundary as part of any future proposals on adjoining site allocations. This is expected to take the form of new suitably designed and designated cycleways.

It is fully acknowledged that the station underpass and new bridge over the river are physically constrained pieces of existing infrastructure which are required to facilitate shared movement of both pedestrians and cyclists. However, with further work already being undertaken to look into securing a through cycling link through the underpass, the new Northern Station Square adjoining the RSRP site and the routes north and northwest from the station offer the realistic possibility of achieving a comprehensive approach to the public realm (for instance, consistent treatment of surfaces) to be taken between adjoining landowners to facilitate the connection of 'place' e.g. the station and square to new movement corridors in either direction.

Unlike the underpass and bridge, both routes north and northwest are less constrained by existing infrastructure or natural features and are clearly intended to be of sufficient width to accommodate a degree of separation between 'place-based activities' and the 'need for movement'. Such provision will not only meet the needs of the ever increasing number of commuter cyclist travelling to and from the town's key transport interchange, but also allow more casual and leisure users the opportunity to avoid pedestrian conflict at other times, but also interact with the planned cafes and retail offer throughout the development. Serious thought needs to be given to a coordinated approach from each landowner in order to allow cyclists and pedestrians to easily join designated movement corridors after leaving the station and/or the underpass.

Currently, the indicative parameters within the submitted pre-application material for this development do not provide any level of realistic commitment to this movement corridor or show sufficient ambition in creating a high quality movement route for all users. Little detailed information has been provided to confirm how the movement corridors will effectively link to the station square, the station underpass and the station itself, across Vastern Road and through the Former SSE site to the river and existing pedestrian/cycle bridge. The proposed block form of the RSRP scheme has the opportunity to create meaningful streets, open spaces and buildings frontages; however, if the proximity of built form encroaches on the trafficked parts of the scheme e.g. 'The Avenue' and the public square in front of the station, the scheme will already have prejudiced any ability to allow the necessary continuation of shared public realm and the movement needs of station users and residents. A coordinated movement strategy between all development sites is expected and this is an ideal time for RSRP to take a lead in such strategy as the site is the key linking section and at design stage.

To settle for an unambitious shared surface response to what is a key local plan priority at a time where positive sustainability transport initiatives are required more than ever, will be viewed as a missed opportunity and ultimately an unsupportable scheme..

#### b) Access

The Council has already raised serious concerns over the parallel relationship of two separate vehicular accesses serving the RMG site and the RSRP site from Caversham Road. A single western access to this site allocation is identified within the Local Plan and was also the solution in the 2012 outline permission on the RMG site, to which the RSRP site had right of access. There is a need to consider the opportunity presented by these developments as a catalyst for improvement, rather than replicating existing undesirable access arrangements.

Our Transport and Natural Environment Officers note that the proximity of the northern, eastern and western perimeter block boundaries do not appear to provide a generous enough setback to the pavements in order to provide sufficient space for meaningful landscaping, movement and place making activities. This links directly to the development footprint within the parameter plans and the extent to which it allows the other aspects of good design to be achieved. Perimeter blocks can often appear regimented and soulless if they are not planned and designed with care and therefore we would ask that a greater level of commitment in any outline application showing Layout/indicative layout is provided to securing these wider design objectives.

#### c) Movement and access summary

Given the considerable size, location and strategic importance of this site, any failure to take the opportunities available to fulfil its obligation to providing a high quality movement network for users, will weigh heavily against this scheme. We would expect a Cycling Strategy to accompany and

reinforce the above objectives along with definitive commitments within the parameter plans and the Design Codes to state the requirements/rules for suitable pedestrian and cycle movement. The same presumption applies to necessary setback from key frontages to ensure conflict is reduced and sufficient landscaping and place-making features integrated from the outset.

### 3. Design Codes

Whilst we understand any submission is likely to consist of an outline application with all matters reserved, there is a need to ensure that alongside the parameter plans, a strong set of design codes is able to respond comfortably to the site's context rather than lead to inevitable conflict through the promotion of a scale and form of development which is incompatible with the overall vision of the site allocation and those adjoining it.

Officers are keen to establish a set of clear and precise rules at this stage and avoid the more general language used within the submitted Draft Development Parameters Schedule. A Design Code should be prescriptive, making clear what is not allowed and setting clear, agreeable limits on an otherwise flexible permission.

The Government's Planning Practice Guidance provides a useful description of how Design Codes are intended to operate: *"Design codes are a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should be proportionate and build upon a design vision, such as a masterplan or other design and development framework for a site or area. Their content should also be informed by the 10 characteristics of good places set out in the National Design Guide."* Paragraph: 008 Reference ID: 26-008-20191001. The Council views the need for a proportionate level of detail that is underpinned by a masterplan, and be sufficiently precise in order to give the LPA confidence that high quality design will be secured.

### 4. Layout

The fact that the indicated minimum distances between blocks frontages are currently dependent on the type of use within each building (e.g. office/residential) fails to show any acknowledgment of the need to achieve a good quality sense of space between blocks, regardless of their eventual use. Policy CR10a of the Local Plan requires *"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;"*. Officers strongly advise that the outline parameters should 'unhitch' layout and spacing from 'use' as it would be better to link these to scale, layout and ultimately landscaping.

A street pattern should be created which allows the buildings within it to be flexible and adapt to the needs of society in the future. Should agreed/approved uses change in the future (as is entirely likely), each individual building and block can continue to perform its primary role as an attractive place enjoyed by its users. This is important, as the street layout of this development and those adjoining it are likely to outlast the majority of the buildings which initially occupy the site and allowing new buildings to be built, is essential. Securing street widths which continue to work for movement, access and a multitude of possible uses is key to demonstrating that the scheme has taken all opportunities available to secure a robust, sustainable design from the outset.

For these reasons, the lack of anticipated structure of blocks, distribution of different uses and their densities or building heights do not provide for a clear long term vision for the hierarchy of streets and links to adjoining land parcels. For example, the clear need to reinforce consistent street widths between both the RMG site and the RSRP site is fundamental in creating continuity in design. It also

overlooks the simple fact that more generous spaces are better suited to busier streets and central locations - for which the need to access the town's busiest and most important transport interchange from the north remains paramount. What we are lacking is a Design Code which shows example street hierarchy and across the east/west boulevard and north/south through the middle of both sites.

## 5. Built form and scale

Scale is often expressed in terms of height and massing and is often described by number of floors, height of building parapet, ridge or overall maximum height. As discussed at length during our meeting and with the benefit of Roy Collado Architects' 3D printed model of the town centre, officers have already expressed deep concern over the initial proposed scale of the tallest part of this scheme (Plot D). As made clear at this meeting, we are acutely aware that well-designed tall buildings can play a positive urban design role in the built form of the town. However, equally, their location, siting, relationship to one another and the emerging context or surrounding site allocations require careful consideration. So too does their visual impact on those more traditional areas nearby which are not subject to the same redevelopment pressures as the site in question e.g. to the north and west.

Whilst the principle of tall buildings within the site allocation are accepted in principle and has been expressed clearly from the outset, there appears to be a lack of a policy/design-based rationale to justify the proposed scale of the buildings proposed, in particular in relation to the landmark building forming Plot D and the tallest elements of block A, B and C across the site.

As discussed, the Council's new Local Plan in conjunction with the RSAF contains explicit guidance identifying the area south of Reading Station to be the location where the tallest buildings in the Station Area cluster are to be located (hence the specification for Plot S2 (south of the station) identified to be the District landmark, whereas Plot D (which the application site is within) specifies a Local landmark and a corresponding benchmark height. The RSAF defines Local landmarks as tall or prominent buildings above ten storeys which are nevertheless clearly subordinate and therefore lower than District landmarks.

Firstly in relation to overall height, it is noted that the tallest approved element at Station Hill (extant Station Hill 3, planning permission 130436/OUT) is currently AOD 128m, the proposed plot D at AOD 112.9m (based on the draft parameters plan) is not viewed as 'clearly subordinate' or sufficiently subordinate to the scale of that already approved a Station Hill. The current proposal equates to a difference in height which over short/medium and long distance views are unlikely to be discernible or generate the visual massing dome envisaged by the RSAF and the Local Plan. With regard to the indicative scaling within the RSAF and anticipated role of this site, it is considered more appropriate for such Local landmarks to be in the region of 2/3s of the overall height of the tallest District landmark brought forward within the overall station cluster. Such a general relationship would of course be subject to any respective proposal being fully assessed in accordance with wider design and amenity criteria at that time as set out in the Council's tall buildings policy, Policy CR10a.

The currently proposed height of this part of the site (Plot D) also has a consequence for how other parts of the site function. In particular, whether the scale of other blocks (most notably the tallest parts Block A, B and C) are sufficiently subordinate when compared to the tallest element of both the RSRP site and that of the Former Royal Mail site. The same applies to the indicative benchmark element for these plots, with 71-79m AOD being far in excess of the 6, 7 and 8 storey benchmarks set out for the respective Plots within the RSAF. As development progresses northwards, it should reduce in height to signify an effective transition into those neighborhoods beyond Vastern Road which displaying a more domestic scale.

The above concerns also have a knock on effect in terms of the amount of development being proposed, which again disproportionately exceeds the indicative anticipated amount identified for the overall site allocation. When this was raised at our meeting, there appeared to be little willingness to acknowledge the site's development capacity or recognition of the need to adopt a coordinated approach to the level or type of development being delivered across the whole CR11 allocation.

Indicative floor space is directly linked to bulk and massing of a development. The authority are unclear at this stage as to how the proposed floor space would accurately translate into a level of built form which would not conflict with the master plan for land north of the station. It will be particularly important for us to avoid supporting more floor space than can reasonably be accommodated within agreed massing and height restrictions set by either the emerging Parameter Plans or future design codes. The indicative scale of development is a starting point and any deviation should be informed by supporting evidence. Various indicative massing scenarios for example mix/floor space options would be required.

It appears that the primary driver in informing the level of floor space is simply the desire to exceed and/or match the 'proposed' landmark and benchmark parts of the adjoining former Royal Mail site rather than the primacy of the new Local Plan or RSAF master planned vision for this site. This will require a careful reappraisal along with the need to have the application supported by relevant Economic Impact Assessments to demonstrate there would not be an over-supply of any one type of floor space in the immediate area. Alongside this would be the need for more detailed design rationale which addresses not only those concerns raised above with regard to scale, but also the need to adhere to the public space and movement priorities promoted through this site allocation as discussed in earlier sections. It is recommended that in addition to floor space measured in square meters, the anticipated low-high range of residential units is included, based upon a policy compliant mix, to allow the LPA to consider the overall additional demand on local services and infrastructure.

To develop the site in excess of its maximum anticipated parameters without any allowance for public space or robust and generous street designs would be in direct conflict with the Council aspirations to see a versatile neighbourhood created which successfully achieves a sense of place and is able to fully offset the need of existing and future residents.

## **6. Public realm and open space**

For this development in particular, there is an overriding need to ensure that the spaces between buildings are of outstanding quality with the creation of public realm fundamental to the success of the site itself and its legacy. There are numerous opportunities for public spaces as part of this scheme (streets, squares, parks and other spaces), yet their roles and how each will function, at this stage, is unclear. These features will undoubtedly be the setting for most use and movement through and within the site. Without a comprehensive approach to their provision across the whole site allocation and wider townscape, each land parcel risks creating their own isolated public realm approach. You should be aware that officers are currently in the process of setting out public realm and movement principles for the town centre area, of which your site will be a key component part.

Well designed and meaningful public space within this scheme needs to encompass its integration into the wider movement network (as described above) as well between its own various elements and that of the adjoining Former Royal Mail site to the southwest and SSE site to the north. Cumulative reliance upon existing public open spaces further away from the site (e.g. Christchurch meadow etc) will not be sufficient for this size of scheme and have been identified as a concern from our Leisure and Recreation Team.

As outlined within their comments, the Council's Open Spaces Strategy seeks to bring about additional provision and improvements to cater for the increased demand brought about as a consequence of a rising population. As a minimum, all new development should make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space. New provision will be sought on residential sites of 50 or more units, or for developments where the availability and quality of existing provision has been identified as deficient in the provision for open space. With a growing population resulting from this development alone, notwithstanding that of adjoining development parcels, it follows that the amount and quality of open space should increase proportionally.

As the development would vastly exceed 50 new residential units and is located in an area poorly provided with recreational public open space, it is expected to make usable on-site provision for outdoor recreation. It is consequently the authority's view that these proposals do not provide sufficient commitment to provide the quality and quantum of open space required for a development of this size or in this location. Such provision at a required quantum would be a condition of scheme, and be integrated within the overall proposal for implementation at reserved matters stage.

## **7. EIA scoping opinion**

In advance of determining any formal EIA Scoping Opinion, the Council has already provided feedback on 6 Nov 2019. In summary, air quality and noise are matters that need to be carefully scoped in. So too is the cumulative impact on open space provision in the area as highlighted above. This of course will need to be modelled on the 'worst case scenario' of all developments (RMG, RSRP, Station Hill, SSE) being brought forward. We have already emphasised the importance of any scoping report containing realistic and accurate scenarios from 'Baseline', 'Interim' and 'Completed Development Scenario, taking into account the cumulative impacts of other schemes.

For this scheme, the cumulative socio-economics effects of the proposal will be important. Such an assessment will need to be undertaken of the potential effects of an agreed list of cumulative schemes including the likely population, employment and housing effects, which in particular are becoming widely discussed in light of the significant amount of floor space being brought forward at this time and heavily overlap with the important observations made by the RBC Leisure & Recreation. We are satisfied that the Environmental Statement would not require a chapter on Transport, as the development would reduce vehicle movements in the area over the current retail units. However, the feedback received from the public consultation event may affect this position (see public exhibition section below).

## **8. Townscape and Visual Impact Assessment (TVIA)**

We are aware that work is progressing on representative viewpoint selections to meet the requirements of a Townscape and Visual Impact Assessment (TVIA). The work already undertaken by consultants to identify relevant verified views is welcomed and will be an important requirement of any future application to establish those relevant parameters. Verified views will be taken for 15 viewpoints that provide a sufficient range of views and distances to inform the TVIA.

## **9. Affordable Housing**

In terms of affordable housing it is accepted that little discussion has currently been held over the anticipated approach to this site. Without being able to confirm acceptance of the amount of development or accurately predict the composition of any particular mixes, the site is expected to

provide 30% on-site provision in accordance with Policy H3. For a site of this scale, the early involvement of a registered provider is encouraged.

The tenure, size and type of affordable housing provided as part of any scheme should respond to the identified need for affordable housing taking account of the most up-to-date information, including information in the Council’s Affordable Housing Supplementary Planning Document. We would strongly encourage early engagement with our Housing Team identify how this site and those adjoining it (which make up the site allocation) can best meet the areas of highest need.

The affordable housing target set in the new local plan has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. An updated Affordable Housing SPD is due for release in March 2020 which will not only take account of any changes to the affordable housing definition, but also include a greater level of detail on built-to-rent products and the need for development to ‘fix’ tenures. As this development is of a significant scale and has a large site area, it is fully expected for affordable housing to be provided at suitable locations on-site.

As the pre-application process continues it is full recognised that detailed discussions will be ongoing regarding the specifics of this critical element of the proposals. If the proposal is not able to deliver a policy-compliant level of affordable housing, please note that the Council’s valuer will be charging a separate fee for the assessment of viability matters (at either pre-app or application stage), as detailed below.

Type	Initial fixed fee*
Strategic / multiphase schemes	£10,000 (excluding VAT**)
*If deferred to external consultants then their cost will be advised at the time of outsourcing.	
**All pre-application viability charges are subject to VAT. Those considered at application stage are not subject to VAT.	

The authority would also require a commitment to meeting a policy compliant dwelling mix at the outline stage, along with accessible and adaptable homes.

## 10. Public Exhibition

A number of key concerns were identified in feedback received from the public exhibition. These concerns have also been expressed through local media and are shared by Officers within the authority. The first is the lack of any public/private vehicle parking on site. With all proposed developments in the area, this is likely to also benefit from a coordinated approach. With the Council’s climate emergency declaration and enhanced suitability aspirations high on the agenda, a degree of flexibility does exist in the provision of private parking, but public perception over the loss of parking associated with the retail units needs to be carefully considered.

The next key concern identified from the public exhibition is the loss of the existing retail food store (Aldi) and apparent absence of any equivalent or enlarged replacement. Meeting the needs of existing and future residents and those in the immediate area is a key role of new development and pillar of the NPPF. The simple fact that an alternative supermarket would continue to exist to the east of the site (Tesco Napier Road) is not considered adequate justification in allowing the loss of the one of the town’s most centrally located and well used discount food stores. Especially not at a time when the population for this part of town is planned to increase significantly (simply through approved schemes alone), placing even greater demand on those few food stores that remain. As with other aspects of this development, there is a need to ensure the development meets the policy aspirations for retail and leisure provision. This may also be a matter which benefits from combined landowner engagement

to ensure the right type of retail provision is able to be beneficial for future occupants and existing residents in the surrounding area. We would be happy to engage with you further on the implications of its removal and am sure the operators themselves would be willing to explore alternative models to allow an enhanced food store presence. It is known that deep discount operators already operate low parking models and split/level versions of their stores in Europe and the site potentially offers an ideal opportunity to explore and secure such provision in the scheme. Currently little information is present as to how this development will meet both the objectives of the site allocation and needs of residents.

## **11. Conclusions**

Based upon the level of information provided to date and lack of vision expressed for this site, Officers have justified concerns that these proposals do not sufficiently demonstrate that they are part of a comprehensive approach to the Policy CR11 sub-area. There is an overwhelming need to ensure that this site and those adjoining it, do not prevent each other from fulfilling the aspirations of Policy (CR11). The authority is equally aware that the scale of some of buildings proposed on this site, the pending application on the RMG site, and nearby Station Hill (extant permission) currently lack cohesion and a firm rationale which fulfil their roles as set out within The RSAF. The current scale of building shown in these proposals is at this time unjustified, excessive, uncoordinated (with other neighbouring sites) and therefore unsupportable.

Officers are keen to ensure that in addition to fulfilling adopted policy aspirations for each site, developments do not reduce or unacceptably harm the environmental quality (daylight/ sunlight/ wind/ layout/ outlook/ sense of enclosure) of future occupiers and users as a result of a clear and preventable failure of adjoining landowners to communicate and adopt a comprehensive approach. A comprehensive approach will not only allow the site allocation to meet its social and environmental objectives, but achieve a level of policy compliant type of development and a clear route to delivering shared infrastructure for the town. The RSAF continues to provide a suitable framework for this and shall be used as a basis to frame advice to all relevant developers.

We share and recognise your ongoing desire to discuss and agree matters at an early stage of the design process and agree the relative priority for different parts of this site. However, it is clear that given a lack of agreement between the various developers, the options for officers are either to ensure that development aspirations are sufficiently controlled; or to coordinate developers in order to agree a mutually-acceptable design/policy solution. The Council has an ambitious and optimistic vision for this site and feels this is the perfect opportunity for Barton Willmore to take a lead in ensuring it fulfils its intended role within the new Local Plan.

## **12. Timescales/next steps**

In light of limited communication recently, it would be of benefit to have a detailed update on the intentions of this live pre-application enquiry prior to a meeting being held on 16 December 2019 where this site along with adjoining development sites will be discussed in detail. It would also be useful for the authority to have an updated timetable as to when a 'final' package will be ready for us to consider in advance of any formal submission.

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

I trust that this advice note is of assistance to you.

Yours sincerely

**BConlon**

**Brian Conlon** BA (Hons) MSc MRTPI  
Principal Planning Officer

*BCE*

(via email only)