

## READING PARK STATION

### **LPA Response to Appellant's Note of clarification on building storey heights 14 10 2022**

PLANNING INSPECTORATE REFERENCE: APP/E0345/W/21/3289748

READING BOROUGH COUNCIL PLANNING REFERENCE: 200328/OUT

#### Scope

- 1.0 The appellants were given the opportunity to cross examine Mr Doyle on this evidence and/or call their own witness to counter it – they choose to do neither. The LPA consider that the Appellant's Note extends beyond a clarification. Therefore, if the Appellant's note is accepted, then the inspector is invited to accept this note in response.

#### Correction to ID71 Table 2

- 2.0 ID71 Table 2 contained an error, as the Inspector highlighted (and the Appellant repeats in their note). The minimum Ground Floor finished floor level should be 0.49m above the site datum, not 0.44m. The effect that ID71 Table 2 column 4 heights should be raised by 5cm. A revised table is attached
- 3.0 Adjusting the finished floor level in Table 2 does not change the plots with negative numbers (Aii, Bii, Biii, Biv, Bv Ciii).

#### Roof structures

- 4.0 ID71 Table 2 column 4 calculates the Illustrative Scheme (IS) building heights by multiplying the storey heights in the ID30 column by the minimum floor-to-ceiling heights in the Design Code page 91.
- 5.0 ID71 para 2.3.3 confirms: 'This is without considering roof structures shown in the Illustrative Scheme, parapets to roof terraces or rooftop plant.'
- 6.0 The ID30 notes state '*AOD levels for Illustrative Scheme include (SIC) pitched roofs*'
- 7.0 It is important to note that The Table 2 column 4 calculated heights are not directly comparable to the building heights shown in the DAS IS elevations. The IS shows apex roofs rising some 2.5 – 3.5 m above the highest residential storey as well as perimeter roof parapets and roof terrace railings. An allowance must also be included for flat roof over and above the 800mm ceiling services zone included in the minim floor to floor heights in DC 5.10. The Appellant confirms rooftop plant has not been considered in the IS.
- 8.0 This means up to 3.5m needs to be added to the ID71 Table 2 column 4 heights to account for roof structures shown in the IS.

## Appellant Table 1

- 9.0 The Appellant has produced a new table, 'Table 1'. Columns 2, 3 and 4 of Table 1 record the finished ground-level correction. However, columns 5, 6 and 7 present new calculations without a proper explanation – crucially, they are taking the calculated floor to floor storey height without considering the roofs structures shown in the IS.

10.0 plot name	Calculated height of building (from ID76 Table 2 column 4)	Plus additional 0.05m (38.59 - 38.54)	Revised Building height above ground level	AOD top of building (previous column plus 38.10)	Maximum parameter height from parameter plan	difference (scope to increase height within parameter height)
Aii	26.49	0.05	26.54	64.64	71.10	6.46
Bii	26.49	0.05	26.54	64.64	64.45	-0.19
Biii	13.89	0.05	13.94	52.04	55.10	3.06
Biv	17.04	0.05	17.09	55.19	55.10	-0.09
Bv	17.04	0.05	17.09	55.19	55.10	-0.09
Ciii	13.89	0.05	13.94	52.04	79.10	27.06

Table 1

- 11.0 Column 5 gives the calculated AOD top of the building (previous column plus 38.10) without accounting roof structures. Plot Aii IS has a flat roof with a low parapet (typically adding 1m in height), and Biii and Ciii have flat roofs with terraces and parapets/ balconies (typically adding 0.85m and up to 2m in Station Hill Scheme in ID71 Figure 7). Other plots have apex/dormer roofs (typically 2.5 to 3.5 tall-see ID71 Figure 2).
- 12.0 Column 6 gives 'Maximum parameter height from parameter plan' (which must include all permanent structures- except for CHP chimneys).
- 13.0 Column 7, 'Difference (scope to increase height within parameter height)', contains a different calculation from ID71 Table 2 column six. This is misleading because the indicated scope to increase heights can only be fully realised where there are no roofs, rooftop parapets, or plant enclosures – the Illustrative Scheme shows apex roofs to plots.
- 14.0 **Table 1 and the associated arguments are new evidence and, in the LPA's view, should not be accepted at this late stage.** A simple amendment to ID71 Table 2 should suffice.
- 15.0 Table 1 confirms that the Illustrative Scheme, as shown in the DAS, exceeds the Parameter Plan height envelope.
- 16.0 The Appellant argues the difference is *de minimis*, although, at 1.6 and 1.7, they mistakenly refer to 9mm and 19mm when they mean centimetres (and the IS scheme roofs structure heights are not *de minimis*).

17.0 The Appellant wishes to focus on their claim that the floorspace can be accommodated within the PP envelope by ‘squashing’ floor to ceiling heights below Design Code (DC) mandatory heights whilst ignoring all roof top structures in the IS.

Design Code floor to floor heights

18.0 The Appellant refers in para. 2.0 to Design Code Section 5.1 (Presumably a typo. when the reference is to ID67 5.10 page 91). The Appellant fails to highlight that the minimum floor-to-floor heights are **mandatory**. By drawing attention (para. 2.1) to the discretionary text at Design Code 5.1, they are claiming the discretionary text qualifies and varies the mandatory requirements. This undermines the mandatory nature of sections of the Code. They argue that the floor-to-ceiling heights are the purpose of the design coding, but that is not what the code says at 5.10 first column second bullet.

19.0 This is new evidence and a flawed analysis, which was never put to Mr Doyle and therefore justifies a further response.

20.0 A correct interpretation of the DC is that where the service zones are slimmer, there is an opportunity to provide more generous floor-to-ceiling heights over the minimum given in the design code. In any case, the Appellant has not submitted evidence to support the claim at 2.2 that the services zone can be made slimmer.

21.0 The practical effect is that the Appellant confirms the Illustrative Scheme does not accord with the mandatory floor-to-floor heights in the Design Code. Instead, it relies on discretionary text to reduce floor-to-floor heights to 3.0m.

Table 2

plot name	Calculated height of building 4m GF plus 3.0m per resi storey	Plus additional 0.05m (38.59-38.54)	Revised Building height above 38.1 ground level	AOD top of building (previous column plus 38.1)	Maximum parameter height from parameter plan	difference (scope to increase height within parameter height)
Bii	25.44	0.05	25.49	63.59	64.45	0.86
Biv	16.44	0.05	16.49	54.59	55.10	0.51
Bv	16.44	0.05	16.49	54.59	55.10	0.51

Table 2

22.0 The Appellant’s calculation in Table 2 demonstrates that where the floors to floor heights are ‘squashed’ below the DC minima, different building heights may be arrived at.

- 23.0 At 3.0 they look at the effect on plots Bii, Biv and Bv. However, this can only be achieved where **all** floor-to-floor heights in the block, including Bi and Bii, are reduced. And the reasonable conclusion is that the entire IS has been designed at this height, as suspected (ID71 2.3.10).
- 24.0 Squashing floor-to-floor heights and services zone increases the need for a thicker 'sandwich' at roof level, raising the height and taking no account of parapets, railings (min 0.85m), and apex roofs (2.5-3.5 m).
- 25.0 The illustrative Scheme shown in the DAS does not fit within the Parameter Plan height envelope without varying the scheme or amending mandatory elements in the Design Code.
- 26.0 The Appellant's floorspace and height information relates to a different scheme than that shown in the DAS.

**Revised Table 2 (replacing the table ID76 Errata Sheet to the Supplementary Proof) Proposed Revised**

ID30 Plot subdivisions	Building height above site datum (38.1 AOD)	Storeys (ID30 Column 5)	Height calculation (using storey heights given in ID30 Column 6)	Surplus/ shortfall	Potential to increase height (m)
	From ID30 Column 3		GF finished level <b>0.49m</b> above site datum**, 4m GF min. floor to floor level, 3.15 minimum residential upper floor to floor level***)		Parameter Plan envelope height (ID30 column 2) minus Illustrative Scheme height (ID30 Column 4)
Ai	54.7	16	51.74	2.96	1.6
Aii	26.2	8	26.54	-0.34	6.8
Aiii	33	10	32.84	0.16	0
Bi	54.7	16	51.74	2.96	0
Bii	26.3	8	26.54	-0.24	0.05
Biii	13.4	4	13.94	-0.54	3.6
Biv	16.9	5	17.09	-0.19	0.1
Bv	16.9	5	17.09	-0.19	0.1
Ci	54.7	16	51.74	2.96	1.6
Cii	29.1	8	26.54	2.56	11.9
Ciii	13.4	4	13.94	-0.54	27.6
Civ	32.3	9	29.69	2.61	8.7
Cv	26.1	7	23.39	2.71	14.9
Di	73.9	22	70.64	3.26	0.9
Dii	48.4	14	45.44	2.96	26.4
Diii	48.4	14	45.44	2.96	1.4

\* The DAS Illustrative Scheme indicates six storeys

\*\* Para 4.5 of Revised Parameter Plan Schedule (ID61)

\*\*\* Mandatory floor-to-floor heights at para. 5.10 (page 90) Revised Design Code (ID67).