

Jane Harrison  
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Via Email

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14 June 2021

Your contact is: Brian Conlon, Principal Planner, Planning & Regulatory Services

#### TOWN AND COUNTRY PLANNING ACT 1990

Enquiry Reference: 200748

Address: 3-5 Craven Road, Reading

Proposal: Original Description - *The development proposal is for the residential development of the site. The proposal comprises the residential conversion of existing building(s) as well as new-build residential flats/houses. Two options are submitted for pre-application discussion, one option is for 20 dwellings and the other is for 22 dwellings.*

Dear Ms Harrison,

Further to your pre-application submission and a virtual pre-application meeting held with myself, the Council's Natural Environment Officer and Conservation and Urban Design Officer, this response is intended to advise you on the likelihood of the proposed scheme being supported by Officers if submitted as a formal planning application. The Local Planning Authority (LPA) recognise that the proposal has developed over a short space of time, therefore it is hoped the following advice is useful in identifying those aspects that are supported and those aspects that would raise concern should a planning application be submitted.

At this stage, the main considerations are likely to be:

- Principle of development
  - Land use principles
  - Residential mix, density and affordable housing
- Heritage and design
- Residential amenity
- Environmental protection
- Transport matters
- Natural environment and ecology

- Flood risk and drainage
- Sustainability
- S106/Community Infrastructure Levy

## 1. Introduction and context

You have sought the LPA's advice on the redevelopment of the site. Initially two options were proposed as part of this pre-application enquiry. These are summarised as follows:

### Option 1

- 22 dwellings (all flats).
- Retention and conversion of 3 Craven Road (Block A)
- Demolition of 5 Craven Road replacement with a new 3 storey building (Block B)
- New 3 storey building (Block C) on Erleigh Road
- New three storey building (Block D) on the corner of Craven Road and Erleigh Road.
- Affordable located in Block D on the corner of Craven Road and Erleigh Road

### Option 2

- 20 dwellings (flats and houses).
- Retention and conversion of 3 and 5 Craven Road (Block A and B )
- New terrace of No.5 three-bedroom houses is proposed (Block C) on Erleigh Road.
- New three storey building (Block D) on the corner of Craven Road and Erleigh Road.
- Affordable located in Block D on the corner of Craven Road and Erleigh Road

As acknowledged, the scheme has evolved during the pre-application process and following general support for option 2, a set of revisions were received and considered after our pre-application meeting. The main changes are summarised as follows:

- 4 semi- detached dwellings instead of 5 terrace town houses, facing the road rather than staggered.
- Pulling back the block on the corner of Craven Rd/ Erleigh Road slightly to allow for enhanced landscaping.
- 3 storey link extension to the rear of retained No. 3.
- Reducing the total number of car parking spaces from 22 to 19 (2 for each of the four houses and 11 for the 18 flats/studios).
- The 6 affordable studios/flats all remain in the block on the corner of Craven Rd and Erleigh Rd.
- Indication of an area of shared amenity space which would be behind the Erleigh Road boundary wall and provide a usable area for residents.

As acknowledged by all parties, the site has a relevant planning history in the form of a complex appeal background. The application was subject to a previous planning application for the demolition of existing buildings and redevelopment to form 25 retirement living units (C3 use) for older persons with communal facilities, parking and associated landscaping. Application Ref 171954 was refused by the LPA on 8 February 2018. Based on the LPA's refusal reasons, the main substantive issues surrounding Appeal Ref: APP/E0345/W/18/3198514 were:

- i. whether the loss of the non-designated heritage asset (NDHA), taking into account its significance, was outweighed by the planning benefits of the scheme;
- ii. Whether the scheme, by reason of its scale and footprint, would have a detrimental impact on the character & appearance of the area;
- iii. Whether the proposal would result in harm to the living conditions of the occupiers of no 7 Craven Road, with particular regard to privacy & overlooking;
- iv. Whether the loss of a street tree would be outweighed by the planning benefits of the scheme; and
- v. Whether the proposal makes adequate provision for affordable housing.

The Inspector concluded that the appeal scheme would remove a locally listed building which enlivens the street scene and which has unique links to a leading local architect; it would harm the character and appearance of the area including the loss of a healthy street tree; it would harm the living conditions of nearby occupiers in no 7 Craven Road and would fail to deliver appropriate affordable housing. The Inspector reasoned that any of these identified reasons would have been sufficient to dismiss the appeal.

## 2. Site description and constraints

The site is located at the roundabout junction of Craven Road and Erleigh Road to the south-east of the town centre and opposite the Royal Berkshire Hospital (RBH). At the time of this submission the site remains within the ownership of the local NHS Foundation Trust and was used as a community facility (the Dingley Health Development Centre) run by RBH.

Number 3 Craven Road was added to Reading Borough's List of Locally Important Buildings and Structures in 2015 in recognition of its local heritage significance. It is therefore a 'non-designated heritage asset' as defined in the NPPF. The building is two storey mid-Victorian house in a Gothic style.

The site is located within Flood Zone 1 and Council designated Parking Zone - 2.



Fig 1 - Aerial view of Craven Road frontage (Google Maps 2021)





Fig 2 - Aerial view of Erleigh Road frontage (Google Maps 2021)

### 3. Planning Policies

The following policies and guidance are considered relevant considerations when assessing any proposal that may come forward on this site.

#### National Planning Policy Framework (NPPF)

Section 2 - Achieving Sustainable Development  
 Section 5 - Delivering a Sufficient Supply of Homes  
 Section 8 - Promoting Healthy and Safe Communities  
 Section 9 - Promoting Sustainable Transport  
 Section 11 - Making Effective Use of Land  
 Section 12 - Achieving Well-Designed Places  
 Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change  
 Section 16 - Conserving and enhancing the historic environment

#### Reading Borough Local Plan - November 2019

Policy CC1: Presumption in Favour of Sustainable Development  
 Policy CC2: Sustainable Design and Construction  
 Policy CC3: Adaptation to Climate Change  
 Policy CC4: Decentralised Energy  
 Policy CC5: Waste Minimisation and Storage  
 Policy CC6: Accessibility and the Intensity of Development  
 Policy CC7: Design and the Public Realm  
 Policy CC8: Safeguarding Amenity  
 Policy CC9: Securing Infrastructure  
 Policy EN1: Protection and Enhancement of the Historic Environment  
 Policy EN6: New Development in a Historic Context

Policy EN12: Biodiversity and the Green Network  
 Policy EN14: Trees, Hedges and Woodland  
 Policy EN15: Air Quality  
 Policy EN16: Pollution and Water Resources  
 Policy EN17: Noise Generating Equipment  
 Policy H1: Provision of Housing  
 Policy H2: Density and Mix  
 Policy H3: Affordable Housing  
 Policy H5: Standards for New Housing  
 Policy H10: Private and Communal Outdoor Space  
 Policy TR1: Achieving the Transport Strategy  
 Policy TR2: Major Transport Projects  
 Policy TR3: Access, Traffic and Highway-Related Matters  
 Policy TR4: Cycle Routes and Facilities  
 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging  
 Policy ER1: Sites for development in East Reading
 

- Policy ER1b: DINGLEY HOUSE, 3-5 CRAVEN ROAD

#### Supplementary Planning Documents

Sustainable Design and Construction (2019)  
 Planning Obligations under Section 106 SPD (2015)  
 Employment, Skills and Training SPD (2013)  
 Residential Conversions SPD (2013)  
 Affordable Housing SPD (2021)  
 Revised Parking Standards and Design (2011)

#### Other Reading Borough Council Corporate documents

Reading Tree Strategy (2021)  
 Reading Open Space Strategy Update Note (2018)  
 Reading Open Space Strategy (2007)  
 Waste Management Guidelines for Property Developers, Reading Borough Council

#### Other material guidance and legislation

National Planning Practice Guidance (2021)  
 National Design Guide (2019)  
 National Model Design Code (2021) and Guidance Notes for Design Codes (2021)  
 Technical Housing Standards - Nationally Described Space Standard, DCLG, 2015

The Town and Country Planning (General Permitted Development) (England) Order 2015  
 Section 66(1) of the Town and Country (Listed Buildings and Conservation Areas) Act 1990  
 Section 72 of the Town and Country (Listed Buildings and Conservation Areas) Act 1990

The Community Infrastructure Levy (CIL) Regulations (Amended 2015)  
 Department for Transport Manual for Streets  
 Department for Transport Manual for Streets 2  
 Berkshire (including South Bucks) Strategic Housing Market Assessment - Berkshire Authorities and Thames Valley Berkshire Local Enterprise Partnership, Final Report, February 2016, prepared by GL Hearn Ltd  
 Site Layout Planning for Daylight and Sunlight: a guide to good practice (BR 209), P. Littlefair, 2011  
 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015b)

#### 4. Appraisal

##### a) Principle of development

###### *Land use principles*

Policy CC1 of the Reading Borough Local Plan (RBLP) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development which lies at the heart of the National Planning Policy Framework (NPPF). To achieve sustainable development a proposal needs to meet economic, social and environmental objectives. It is considered that a proposal for new housing would contribute to providing sufficient land for housing, a range of homes, and would make effective use of land (Para. 117 NPPF).

A key Government objective is to significantly boost the supply of new homes (Section 5 of the NPPF), and the local housing requirement is set out within Policy H1 (of the Reading Borough Local Plan RBLP). As you will already be aware, the site is located within part of allocated site CR12 in the Council's adopted Local Plan (2019).

More specifically, the site forms a site-specific allocation within Policy ER1 'Sites for development in East Reading'. Sub Policy ER1b 'Dingley House, 3-5 Craven Road' allocates the site for 15-22 dwellings and supports the retention and change of use of the locally listed building for residential purposes with limited additional development. Specifically, Policy ER1b requires the retention of the locally-listed building, which is subject to an Article 4 direction, and requires that additional development enhance its setting. It also requires development to 'reflect' the setback of buildings from the road in the immediate local area.

The principle of residential development on the site is therefore established through the Local Plan subject to retention of the 3 Craven Road. However, the amount of residential development and the specific type of residential development must be considered carefully.

With regard to the principle of retaining the Non designated heritage asset (NDHA) on site, both initial options and revised third option retain 3 Craven Road as required by the policy. This is supported by the LPA. In term of the quantum of residential development proposed, both initial options would deliver up to 22 dwellings. Whilst at the upper limit of the indicative site capacity, this is within the range provided by the local plan allocation and supported subject to an acceptable overall scale, massing and design. Finally, with regard to any development respecting the building line in the surrounding area, this will be looked at more carefully in subsequent section of this response.

Put simply, a residential scheme that retain the NDHA would not be fundamentally inconsistent with the overarching spatial strategy for the site as set by the Local Plan. In its broadest sense, the Local Plan recognises that this site constitutes a development opportunity which can positively contribute to meeting the borough's ongoing housing need and making better use of a previously developed site.

###### *Residential density, mix and affordable housing*

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 around

the edge of Reading town centre and that when developed in a sensitive way, can offer the opportunity to accommodate development at higher densities.

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. Policy H2, which specifically relates to density and mix, recognises the need to maximise the efficient use of land, requires that the density of residential development is informed by amongst other things, the character and mix of uses of the area in which it is located (including nearby heritage assets), its current and future level of accessibility by sustainable means and the need to achieve high quality design.

Within the Local Plan, indicative densities for different areas are set out in Figure 4. The supporting text goes on to acknowledge that the criteria discussed above may indicate that a different density may be appropriate based on the individual site characteristics. The proposed development seeks up to 22 units. This would equate to a density of approximately 60-67 dwellings per hectare (dph).

Figure 4.5 of the Local Plan provides indicative density ranges (dwellings per hectare) for suburban, urban and town center sites. Whilst not applied as hard-and-fast rules, the particular characteristics of a development site when judged against the criteria in the policy may well mean that a density outside these ranges is appropriate. In this case, based on its location, immediate land uses and level of connectivity, the site is accepted as displaying general urban characteristics. Therefore, the proposed density is considered consistent with the lower range contained within Policy H2 (which sets an indicative density range of 60-120 dwellings per hectare for an urban area). It should be noted that whilst density can be 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. Therefore, whilst the proposed density is largely accepted, it must be considered in tandem with all other policy criteria which consider the existing character of the area and issues such as heritage, which will be covered separately in this response.

With regard to dwelling mix, Policy H2 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.”*

The various options submitted show a mixture of dwelling types e.g. flats or houses, and a broad mix of units from Studio Apartments, One Bed Flats, Two Bed Flats, Three Bed Flats, Three Bed Houses. Should there be any departure from the unit mix advocated by the local plan, then justification would need to accompany any future application

With regard to affordable housing, the scheme would need to meet affordable housing requirements as set out under Local Plan Policy H3. A scheme of this scale would require an onsite provision of 30%, and an appropriate tenure mix reflective of the most up to date position on needs within Reading for a traditional build to sell (BtS) scheme. This currently constitutes a need to contain at least 62% Social Rent, or Affordable Rent capped at 70% of the Market Rent. The other 38% can be a mix of other Affordable Housing tenures, which will need to reflect government requirements for Starter Homes (June 2021).

For such schemes, it is essential that the Affordable Housing is designed to be attractive to Registered Providers (RP) to buy. Given a separate block is proposed for affordable (Block D), the needs of RP will need to be taken into account and the arrangement of cores is key in allowing an interested RP in effectively managing any transferred units.

The proposal identifies 6 affordable units as part of the overall scheme which equates to a 27.2% on-site contribution. The expected on-site contribution would need to match the makeup of the overall mix of the development being proposed. Officers understand that current 'priority need' exists for housing with 2 or more bedrooms as there is a need to ensure that on-site affordable housing is not skewed entirely towards smaller units. As such, dependant on the final scheme, the proposal appears provide sufficient flexibility to meet this requirement, however this should be set out clearly in any future submission. We would also need to ensure that the location of the affordable units be indistinguishable from general housing. Further details of the nature and location tenure is required at an application stage.

If a policy compliant quantum and tenure split of affordable housing is provided, this would constitute a tangible public benefit of the proposal and provide a welcome and material contribution to local affordable housing needs in the borough. This would be secured via S106 agreement and be considered as part of the overall planning balance, with a financial contribution to make up any shortfall.

**b) Heritage**

Policy EN1 'Protection and Enhancement of the Historic Environment' of the Local Plan specifically seeks to ensure that assets on the Local List are protected and where possible enhanced. As a starting point, the policy requires proposals to avoid harm in the first instance. The policy does recognise that should any loss of a heritage asset occur, this must be accompanied by clear and convincing justification, usually in the form of public benefits. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement, which would need to accompany any application.

Policy EN4: 'Locally Important Heritage Assets' is most relevant, as it is the most specific local policy which affects locally important heritage assets. Policy EN4 seeks to ensure that development which specifically affects locally important heritage assets conserve the architectural, archaeological or historical significance of the asset. It is welcomed that the proposal no longer result in the loss of the NDHA (3 Craven Road) and whilst the proposed 3-storey link extension to the rear will undoubtedly alter the overall appearance of the building when viewed from the rear, its retention, along with the removal of later unsympathetic additions and the extensive single-storey modular buildings to the rear, will allow the architectural and historical significance of the building to be enhanced and its contribution to the street scene maintained.

It is important to make reference to the fact that the site marks a transition between distinctly different character areas. To the north and east, lies the more inner urban character area of Eldon Square, Eldon Place and St Johns Road, separated by the busy London Road characterised by non-residential and institutional uses. To the west of Craven Road lie the significant scale and utilitarian form of the RBH which dominate the immediate area. However, to the east of Craven Road and to the southeast along Erleigh Road, the character and appearance becomes distinctly informed by larger Edwardian and Victorian villas set back from tree lined roads with a strong building line. Mature trees are a particular feature that make a valuable contribution to the area's character and appearance. Despite many such villas being in non-residential and flatted uses, the buildings (including 3 and 5 Craven Road within the development site) have architectural quality and coherence with detached properties mostly in red brick, fine dressed stone and terracotta. Furthermore, the spaces between these properties are as important as the buildings, providing a spacious atmosphere. There are also less-desirable features close to the site like modern flatted blocks of limited architectural merit opposite along Erleigh Road. Whilst



not located within a designated Conservation area, the site is recognised as signifying the beginning of the more verdant treelined area to the south and east and this character should be retained and reinforced as part of any development.

As part of the pre-application discussions, engagement has occurred with the Council's Conservation and Urban Design Officer (CUD). The CUD Officer's most recent comments are included below for reference.

#### Site

3 Craven Road is a locally Listed heritage building. A 2-storey brick, late Victorian Villa. It faces onto Craven Road and was a former residential building. The building was formerly used by the Royal Berkshire Hospital but is now redundant and excess to their needs. About 300 metres south of Eldon Square conservation area.

**Fig. 1: No. 3 Craven Road, on left. Strong heritage character, locally listed c.1870s century.**



Conservation Design comments on revised site plan.

No. 5 Craven Road is part of the proposed development site. It is a late Victorian, 2-storey residential villa (considered a non-designated heritage asset). It is noted that it is now been included in the revised proposed scheme for the site. Its retention is supported, as it makes a strong contribution to the character of the street to the south on the eastern side of the street. There are no problems with new development occurring to the rear of this building.

Fig. 2: No. 5 Craven Road, on left. Strong heritage character, late 19<sup>th</sup> century Villa.



The brick wall along Erleigh Street, is the rear boundary of the locally listed building, No. 3 Craven Road (c.1870s). As such it is an important local item. Any openings should be kept to a minimum.

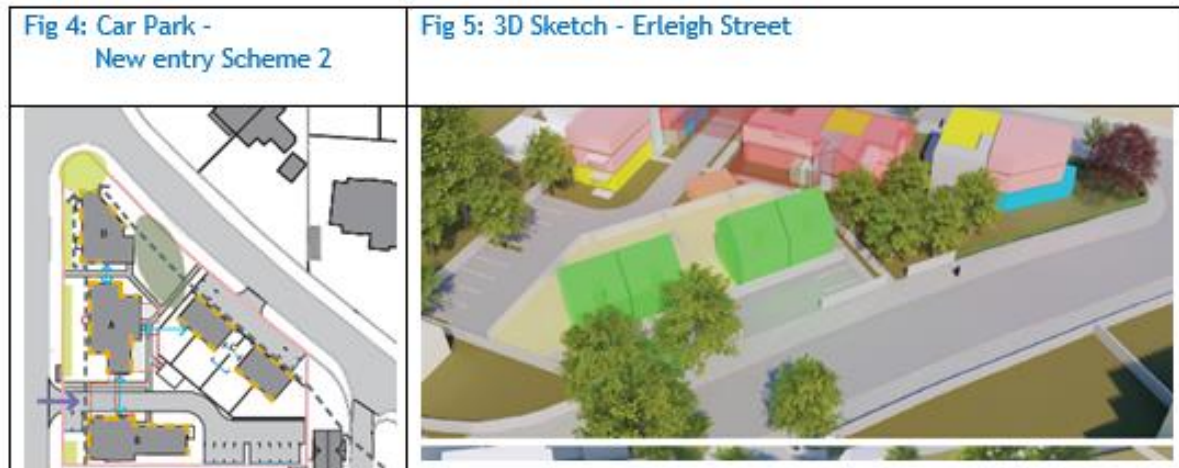
Fig. 3: Existing brick wall on Early Street, looking west from near the gate to Reading School. Strong heritage character, late 19<sup>th</sup> century.



Conservation Comment on revised proposal in Erleigh Street.



## Conservation Comment on revised proposal in Erleigh Street.



1. There is a general concern with a large parking area in front of the proposed 4 town houses.
2. I can understand the one opening in the existing historic brick wall but, have a concern it is too wide. I had the thought of placing a car spot to the side of the new town houses. With a one-way drive in front of the town houses and areas of green planting. One entry into the car-park and one exit out.

### Other Issues in revised scheme

There are no objections on heritage grounds to the items identified below.

Changes are as follows:

- 4 semi- detached dwellings instead of 5 terrace town houses, facing Erleigh Road rather than staggered.
- Pulling back the block on the corner of Craven Rd/ Erleigh Road slightly to allow for enhanced landscaping.
- 3 storey link extension to the rear of retained No. 3.
- Reducing the total number of car parking spaces from 22 to 19 (2 for each of the four houses and 11 for the 18 flats/studios).
- The 6 affordable studios/flats all remain in the block on the corner of Craven Rd and Erleigh Rd.
- Indication of an area of shared amenity space, which would be behind the Erleigh Road boundary wall and provide a usable area for residents.

Yours sincerely

Bruce Edgar, IHBC, M.Phil (Architectural History), M.PIA, M.ICOMOS (UK), B.Arch  
Conservation & Urban Design Officer  
Reading Borough Council

Of note in the above comments, is the implication of the larger parking area to the front of the town houses on Erleigh Road and the extent to which the wall would be removed to allow access. There may be ways to open smaller parts of the wall to allow access whilst sensitively managing the appearance of this frontage so as to soften any breaks and ensure visual continuity. Despite the above concerns (and notwithstanding any need to avoid any negative impact on existing street trees), Officers acknowledges that the wall is not located within a Conservation Area and

is not locally listed or referenced within the site allocation proforma. It is also noted that from a top-level assessment of the immediate area, isolated openings in frontage walls to facilitate access are not uncommon along this part of Erleigh Road - notably opposite the site.

Should such a proposal be submitted which resulted in parts of this wall removed to facilitate access, Officers in consultation with the CUD Officer will need to balance any harm caused to the character of the street against the overall identified improvements to the local listed No. 3 Craven Road e.g. removal of unsympathetic additions, and the retention of No. 5, along with all other benefits the proposed development would entail.

On the whole, the scheme is considered to largely represent a positive approach to the site's heritage, with the approach to the Erleigh Road frontage requiring more thought and information.

#### c) Design

Section 12 of the NPPF places significant weight on ensuring good design which is a key aspect of sustainable development and should positively contribute towards making places better for people. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions. These priorities are further reinforced within the National Design Guide.

Policy CC7 of the Local Plan strengthens the importance of good design stipulated by the NPPF as it requires all development to respect surrounding buildings in terms of scale, height, form and massing. This policy requires development to be constructed using appropriate materials and seeks to ensure that the appearance of the development is successfully able to create a sense of place for its users, with its own identity. The provision of green infrastructure and landscaping will be crucial for such a site which adjoins two converging roads in what is considered verdant and mature part of the town. There is also the need for any new buildings on the site to respond positively to their local context and create or reinforce local character and distinctiveness.

It is recognised that detail relating to the proposed design of the buildings has been removed allowing the general bulk and massing principles to be focussed on. It is understood any developer who acquires the site and takes the development forward will have the opportunity to discuss and develop the detailed design of the proposed development in conversation with RBC in due course.

With regard to the bulk and massing of the proposed scheme, the height of buildings and the consistency of their building line in relation to the street itself will be important, especially where, as in this case there is a strong sense on continuity to the south along the east side of Craven Road (See Fig 3 below).



**Fig 3 - View looking south east along Craven Road (Google Maps - Photo 2012)**

There are generally no major concerns as to the general scale of the four town houses along Erleigh Road, however the massing of Block D needs to be carefully considered given this block's prominence on the corner of Crave Road and Erleigh Road. Failure to secure an appropriate form and design of Block D has the potential to effect on the whole appearance and perception of this site (See Fig 3 above).

Any building height of Block D must sympathetically transition in height to number 5 Craven Road and number 3 beyond. The alignment of Block D appears to deviate from the established and well-defined building line along Craven Road. Whilst not significant, the deviation will be more noticeable given the building's position as the first building along the east side of Craven Road and its apparent scale in relation to subsequent buildings. There is also a need to ensure the proximity and height of Block D does not prevent meaningful large canopy trees from being established or require their canopy to be aggressively maintained on the corner boundary. Sufficient space to the boundary needs to be maintained to allow sufficient sting soft landscaping to be maintained, thereby screening what is considered a busy mini roundabout. This will also assist in providing much needed softening to any elevations of Block D. This is covered in greater detail in later sections of this response.

The 3-storey link extension to the rear of retained No. 3 is unlikely to affect the character or appearance of the street when viewed from Craven Road, however there is a need to ensure it remains subservient to the main building and employs a reimagined and possibly contemporary design to differentiate from the original part of the building and not compete with it through replication.

At this time and based upon the information provided, it is not considered that there would be a sufficient benefit from specialist design input from the Reading Design Review Panel (DRP). For your future information the DRP has been set up in partnership with local architects and meets once every 6 weeks, usually on a Thursday afternoon starting at 2pm. The Panel comprises mostly architects, although there are a small number of other design professionals, e.g. landscape architects, urban designers. The DRP will primarily comment on design and urban design matters

associated with an application. Each Panel will comprise 4 - 6 Members taken from a larger rota of members.

Once a design has been finalised, it is recommended that in agreement with Officers, any proposal is brought to a the DRP for comment.

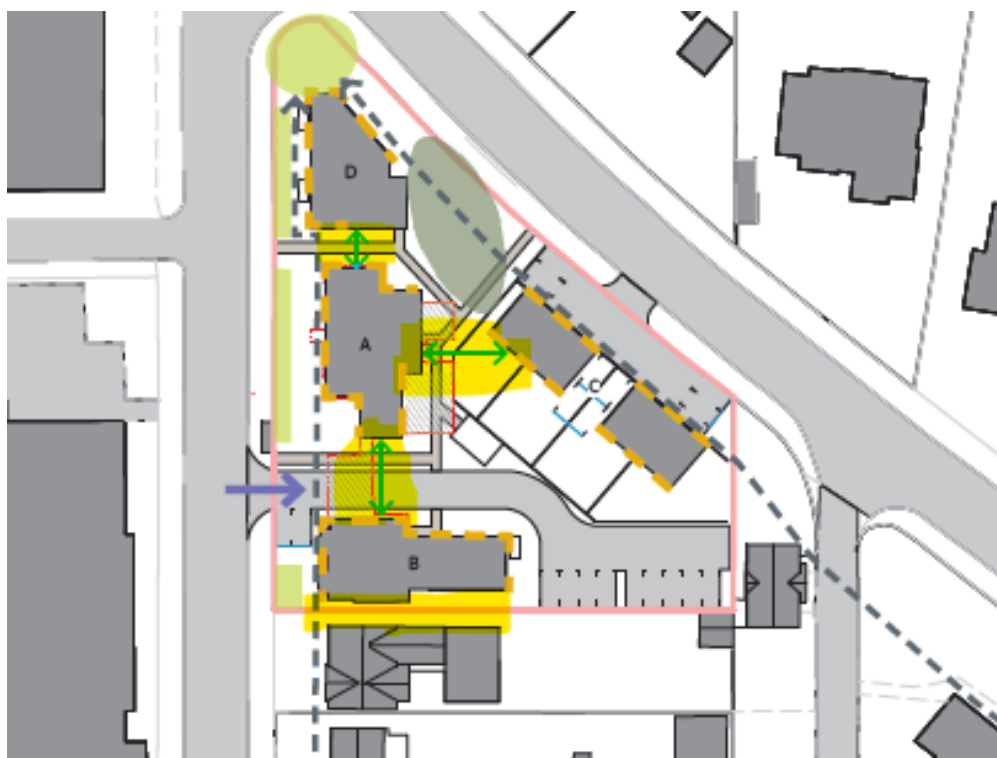
d) Residential amenity

Ensuring a high standard of accommodation is essential to the quality of life of future residents in Reading. This is a key element of the vision for the Borough and more important than ever in light of the ongoing Covid19 pandemic which has affecting almost every aspect of life. Policy CC8 stipulates a number of factors that new residential developments should be considered against to ensure they are not creating unacceptable living conditions, whilst the layout and design of the scheme must have due regard to current nearby and future occupiers.

*Privacy and overlooking*

To begin with, in terms of overlooking between future units, the layout appears to largely recognise the possible conflict areas between habitable windows, and it is hoped that through careful design, future occupiers will not suffer from any harmful loss of privacy. The orientation of windows is generally such that opportunities for window to window views at proximity has or can be minimised, with this only possible at acute angles and commensurate with an urban location and the type of accommodation proposed. The separation between Block A and D and Block A and the rear of the town houses needs to be looked at carefully (See Fig 4 below).

An additional concern which must be noted is any future relationship between Block B and the neighbouring building at 7 Craven Road. If development occurs, these adjoining building may be at close proximity and should habitable rooms be substantially obscured or infringed, the relationship may cause harm. Ensuring any window to window overlooking is reduced as far as possible is a priority and this needs to be accounted for in any submission through the careful consideration of the internal layout and proximity to this site.





#### **Fig 4 - Possible areas of amenity concern (highlighted yellow)**

##### *Internal and external living space*

As a minimum, the internal floorspace for the proposed units should meet (and be expected to exceed) the standards set out in the National Space Standards (DCLG, 2015). This sets out the following minimum internal floorspace:

- 1 bed 1 person - Minimum 39sqm
- 1 bed 2 persons - Minimum 50sqm
- 2 bed 3 persons - Minimum 61sqm
- 3 bed 4 persons - Minimum 70sqm

Notwithstanding any other design related matters, based on the intended unit mix in section 3(a), we do not expect the overall internal size of the proposed units to conflict with these expectations. The LPA reserve further comment respect to whether the internal layout is acceptable once more detailed floorplans are provided. Storage space is essential internally, and we would expect internal space standards to exclude required domestic storage space for occupants.

With regard to external space, an area of amenity space is being proposed to the northeast of the site and that this appears to be the primary source of private amenity space for the scheme. The opportunities for such provision were discussed during our meeting. A priority is ways to make this area as inclusive as possible and not an 'enclosed afterthought' and allowing the space to be utilised by people accessing the building but also in its own right is essential. An area of robust communal space would allow sitting out, socialising, and general outdoor space for residents. If this can offer a safe and pleasant space for residents to relax, children play and meet visitors, and importantly support any unintended or prolonged occupation should the situation require, this will be afforded positive weight in the overall planning balance. Overall, due regard must also be had to the final mix of dwellings brought forward and the need to ensure larger 2-3-bedroom units are adequately provided for in this regard. Details of means of enclosure for any balconies and/or roof terraces will also need to be provided.

In summary, the LPA would expect the scheme to provide a policy compliant range of internal space, private amenity space and well-designed communal space to relax, socialise and meet the day to day needs of future occupants.

##### *Accessibility and lifetime homes*

Policy H5(f) requires that on all developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in Part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.

##### *Health, wellbeing and crime.*

The Covid19 pandemic has highlighted the critical role our urban environment has on the way we live and work. It also highlights how, as a LPA, supporting well planned development can have a huge impact on peoples' health, wellbeing, safety and overall comfort. In addition to the above discussion on amenity, the LPA has an obligation to consider the following health and wellbeing topics in relation to any new development.

Maximising exposure to natural daylight, providing users with an external view and connection to nature are crucial measures in supporting the mental wellbeing of occupants and supported

strongly by Policy CC8 ‘Safeguarding amenity’. Access to private and communal outside space would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation should the situation require. The development will need to ensure it maximises the use of natural daylight and reducing the need for artificial light by occupants.

In recognition of the challenges presented by climate change and with due regard to the Council’s recently declared climate emergency, extreme temperatures can also have an immediate and detrimental effect on health and wellbeing of residents. Effectively controlling and regulating temperature both in warmer months and those colder months is crucial in maintaining a healthy and comfortable environment which is supported by Policy CC3: ‘Adaptation to climate change’. We would expect the glazing to prevent excessive solar gains (especially on the southern elevation) to avoid excessive heating. Private balconies provide the opportunity for natural ventilation to habitable rooms during warmer months. This need to be considered on those frontages where balconies may not exist or be affected by traffic or hospital related noise.

Crime and the fear of crime also have a major impact on quality of life and the wellbeing of a building occupants. Enabling occupants to feel safe and secure is therefore essential to successful, sustainable communities and is supported by Policy CC7 ‘Design and the public realm’. The primary frontages need to provide sufficient levels of natural surveillance, with entrances and residential lobbies covered by CCTV services and audio/visual entry systems. Clarification is required whether the parking area will be served by security gate or have a security access system to avoid any intruders entering. The same applies to any proposed cycle parking, which needs to be secure and accessible ideally via pin pad-controlled entry points. Key to any application will be the observations made by the Council Crime Prevention and Design Officer (CPDA). Notwithstanding this, the LPA would seek to secure full and precise details of how the development will achieve the Secured By Design Award, to demonstrate the measures detailed to date are fully designed and incorporated into the scheme and retained/maintained thereafter.

Green infrastructure and access to green space provides benefits not only to the natural environment, but to the building’s occupants. Introducing design elements within a building which supports human interaction with nature can lead to the promotion of a healthy lifestyle through the promotion of exercise, opportunities for relaxation and subsequently reducing stress levels. The opportunity for fresh air, small scale horticulture, drying of clothes and importantly ventilation of internal spaces needs to be in-built to any proposal. Such access would assist with recovery from respiratory illnesses and support any unintended or prolonged occupation by residents should the situation require. Accordingly, the above health and wellbeing factors would be considered key material planning benefits of any scheme.

e) Environmental protection

The following comments were received from the Reading Borough Council Environmental Health Team:

***Environmental Protection concerns***

***Environmental Protection concerns***

- *Noise impact on development*
- *Bins stores - pests*
- *Redevelopment of land - pest control*
- *Air Quality - introducing new receptors*
- *Air Quality - increased emissions*
- *Contaminated Land*
- *Construction and Demolition phase*

## Noise impact on development

*The development is likely to be affected by road noise.*

*A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.*

*The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.*

*Where appropriate, the noise assessment data should also include noise events (L<sub>A</sub>Max) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.*

*It may be possible through clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.*

*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.*

*Internal noise criteria (taken from BS8233:2014)*

*Room Design criteria                      Upper limit*

*Bedrooms (23:00 to 07:00) <30dB LAeq,8hour*

*Living rooms (07:00 - 23:00)                      <35dB LAeq,16hour*

*Gardens & Balconies <50dB LAeq,T <55dB LAeq,T*

## *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 (likely to breach the EU limit value for NO<sub>2</sub>) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.*

*The applicant will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.*

*Where the development involves converting an existing building and allowing a buffer zone is not an option then 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 exceedence, 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*

*Reading Borough Council's Air Quality Policy DM19 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.*

*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 PM10.*

*The proposed development is located within or adjacent to an air quality management area and has the potential to increase emissions. Depending on the amount of parking to be provided for the properties, an assessment and/or mitigation measures may need to be provided as part of the application.*

*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 agreed with a member of the Environmental Protection Team. Where the assessment identifies an impact on air quality a mitigation plan demonstrating sufficient mitigation to protect the dwellings from poor air quality must also be included.*

*Possible mitigation against increased emissions:*

- *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*
- *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*
- *Provision of cycling facilities / residents cycles*
- *Improvements to local public transport*

*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, however, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.*

*Bin storage - pest proofing*

*There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. Developers should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin.*

*Re-development of land - pest control*

*Where development will be taking place on sites with a former land use, particularly with a former drainage network, you are advised to ensure that former unused drains have been removed and / or properly capped or the proposed development may be at risk of rodent ingress.*

*It is likely that rats will occupy a cleared site. If there is a significant gap between site clearance and re-development, it is recommended that baiting be carried out to eradicate rats prior to redevelopment. This is to prevent rat populations which may be disturbed due to the redevelopment of the site causing subsequent problems to residents and businesses in the local area.*

*Contaminated Land*

*Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.*

*Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.*

*It is possible that the desk study will recommend further intrusive site investigation, if consent is given the further investigation will be required by condition, along with a condition for a remediation strategy and a condition for validation certification that remedial works have been successfully completed. The remediation strategy shall be submitted and approved prior to development and the validation certification prior to occupation. If no contamination is found by the intrusive investigations, then all conditions will be discharged.*

*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.*

*A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.*

*The hours of noisy construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays.*

*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 should be burnt on site.*

f) Transport matters

The following comments were received from the Reading Borough Council Transport Planner as designated Local Highway Authority:

*The development proposal is for the residential development of the site. The proposal comprises the residential conversion of existing building(s) as well as new-build residential flats/houses. Originally, two options were submitted for pre-application discussion, one option for 20 dwellings and the other for 22 dwellings.*

*Amended proposals were received on 12 April 2021 (Feasibility Document Rev A):*

*To summarise, the changes are as follows:*

- 4 semi-detached dwellings (4-bedroom) instead of 5 terrace town houses, facing Erleigh Road rather than staggered.*
- Pulling back the block on the corner of Craven Rd/ Erleigh Road slightly to allow for enhanced landscaping.*
- 3 storey link extension to the rear of retained No. 3.*
- Reducing the total number of car parking spaces from 22 to 19 (2 for each of the four houses and 11 for the 18 flats/studios).*
- The 6 affordable studios/flats all remain in the block on the corner of Craven Rd and Erleigh Rd.*
- Indication of an area of shared amenity space which would be behind the Erleigh Road boundary wall and provide a usable area for residents.*

*The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Whilst the application site is located outside the Central Core Area, it is within close proximity to bus routes 3, 9 and 19 (a, b and c). The site is, therefore, accessible to good public transport links to and from the town centre area.*

*The accommodation schedule provides a mix of units; 7 x 1-bedroom/studio apartments, 9 x 2-bedroom apartments; 2 x 3-bedroom apartments and 4 x 4 bedroom houses.*

*Policy TR5 of the Local Plan states “Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport”. It is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway through on-street parking.*

*The Feasibility Document Rev A illustrates that the total number of car parking spaces from 22 to 19 (2 for each of the four houses and 11 for the 18 flats/studios). The proposed parking provision is significantly less than the Council’s adopted Parking Standards SPD which would require 29 parking spaces. Therefore, the proposed parking provision must be justified in the context of car ownership levels if a lower parking provision is to be considered acceptable.*



*The Council's Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point. In addition, within communal car parks for residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.*

*It appears that the primary vehicular access would be from an existing access off Craven Road with parking contained within the shared car park on the southern boundary of the site. Given that the proposed level of movement generated by the development would be fewer than the existing use, I would be happy to retain a dropped crossing arrangement opposed to a full bellmouth junction. However, visibility splays of 2.4m x 70m should be provided from the site entrance.*

*At present, a bus stop and a post box are situated directly to the north of the proposed access. If visibility from the site access is impacted by the bus stop/shelter, a proposal for relocation of the bus stop should be submitted if a full application comes forward.*

*New parking bays will be introduced at the site entrance. However, no junctions with other roads or accesses to parking areas should be provided along the first 20 metres of the access road. Therefore, these parking bays must be relocated further into the site.*

*I note that the houses fronting Erleigh Road are now to be accessed via a new vehicular access point off Erleigh Road with 8no. parking spaces on the frontage. The introduction of a new vehicular access point will require part demolition of the boundary wall. Erleigh Road is classified as the C200 as a Local Transport Corridor and it should be noted that the Highway Authority resist any new access onto a classified road if alternative access is available. It is noted that there are concerns regarding the introduction of a new access in this location and the impact on the tree roots, therefore, I would prefer to see access taken from Craven Road. Where a direct access is unavoidable, the proposed access will be assessed with particular care to ensure layout and visibility requirements are met. The applicant should refer to the Council's Geometric Design Guidance for Residential Accesses on to Classified Roads which is available to review online.*

*In accordance with the Borough's Parking Standards and Design SPD, a minimum provision 0.5 cycle storage spaces should be provided per flat and 2 cycle storage spaces per dwelling house. This should be provided with a secure lockable store. Full details should be submitted if a full application is intended.*

*The applicant should ensure that the refuse storage provisions comply with the Council's Waste Management Guidance which is available to view online. To minimise the potential for delays to collections, the designated collection area should be large enough for all the refuse and recycling bins to be positioned ready for collection at the same time. The space in the collection area must be sufficient to enable operatives to return emptied bins to a position that does not obstruct the manoeuvring of those containers that are yet to be emptied. Bin storage should be located no further than 10m from the access point of the site. Full details should be submitted if a full application is intended.*

*The above points should be addressed if a full application is submitted.*

g) Natural environment

Policy EN14 of the Local Plan sets out that new development shall make provision for tree retention and planting within the application site to improve the level of tree coverage within the Borough so as to maintain and enhance character and appearance. The proposal sets out the intention to retain all existing perimeter streets trees, whilst making provision for planting within the site to improve the level of tree coverage. Any submission would need accompanying by detailed Tree Protection Plan as it is expected a significant majority of the development area would be within the root protection area (RPA) of a number of trees subject to a Tree Preservation Orders (TPO). The trees lining Craven Road and Erleigh Road are noted as important trees, as they are large and visually prominent and contribute to the areas pleasant and well-defined character.

Part of achieving good design is the intrinsic development of a well thought through landscaping scheme. Any high-quality design would need to carefully consider and incorporate a good quality landscaping scheme, and this would need to be included as part of any formal submission.

I enclose below comments from the Council's Natural Environment Team for reference:

*The development proposal is for the residential development of the site. The proposal comprises the residential conversion of existing building(s) as well as new-build residential flats/houses. Originally, two options were submitted for pre-application discussion, one option for 20 dwellings and the other for 22 dwellings.*

*These two options formed the basis for discussion during our pre-app meeting of 8 May 2021.*

*In relation to the houses on the Erleigh Road frontage, it was noted that the vehicular access was off Craven Rd with individual pedestrian accesses off Erleigh Road with each creating a gap in wall. The acceptability of this was questioned in heritage terms (ref Bruce Edgar's comments). We also questioned whether the wall, being taller than normal frontage boundary treatment, would dominate the house frontages and/or appear overbearing given the relatively small frontages.*

*In relation to the vehicular access off Craven Road, it was confirmed that the existing drop kerb (as shown below) would be used. Confirmation is sought (after liaison with Highways) that no change to that existing drop access will be required given the proximity of the adjacent street tree, i.e. potential harm to it's roots.*



*One major point of discussion was landscaping on the prominent Craven Rd/Erleigh Rd corner. Less room for landscaping had been allowed, including statement tree planting, compared with layout considered under 171954 (as shown below):*



Amended proposals were received on 12 April 2021 (Feasibility Document Rev A) and are now as follows:



*It is assumed that, as before, the existing access off Craven Road will be used and that no changes will be required to this but again, confirmation s required.*

*I note that the houses fronting Erleigh Road are now 4 semi- detached dwellings instead of 5 terrace town houses. It appears that a major change here is the creation of a new vehicular access point off Erleigh Road and parking on the frontage, which will of course require a significant gap to be created in the wall, which is unfortunate and heritage comments will be important for the consideration of this. Of further concern is that this access is between two important street trees. It appears that the indicative plans above show a circle around these trees that could be the RPA? If so, I would suggest that a circular RPA in this location is not appropriate and reference should be made to guidance in 4.6.2 & 4.6.3 of BS5837:2012 in providing a more likely RPA. From experience, I have seen roots in similar locations extend more laterally long the pavement hence it is entirely probable that roots are within the zone in which the access is proposed which is of course a concern. If roots are within the pavement and within the level required for excavation to create the drop access then there is no option other than to sever them which is not acceptable. If the applicant wished to pursue an access here (assuming it is acceptable to Highways/Transport) then one option would be to obtain a licence to dig and carry out exploratory excavations along the edges of the proposed access to see what roots (if any) are present within the required dig zone - this is assuming that root activity is not evident above ground. Without this information, objections are likely to be raised on tree grounds to this access.*

*Any future planning application should be accompanied by a Tree Survey, Arboricultural Impact Assessment, Landscape principles and answers to the queries raised above.*

Please note the comments/advice above. Any formal submission would be expected to provide a landscaping scheme and with respect to Ecology, please note the need to provide the inclusion of biodiversity enhancements as required by the NPPF.

h) Flood Risk and drainage

The site is located within Flood Zone 1 as per the Environmental Agency flood mapping, and the Reading Borough Council - Strategic Flood Risk Assessment (SFRA 2017). A Flood Risk Assessment

With regard to drainage and SuDS, the Council would require a detailed Drainage Strategy demonstrating that a drainage design can be constructed which will achieve compliance with Department for Environment, Food and Rural Affairs (DEFRA) document Non-statutory technical standards for sustainable drainage systems dated March 2015.

i) Environmental Sustainability

In the context of reducing carbon dioxide emissions there are a number of policies within the new Reading Borough Local Plan, which are relevant to new development. The recently adopted Supplementary Planning Document 'Sustainable Design and Construction (2019)' also emphasises the need and importance of securing positive environmental improvements as part of any new major development such as this.

The overarching sustainability Policy CC2 requires proposals for new development to be designed and have site layouts which "use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change." Residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective. No details have been provided at this stage of the pre-application. This would be required at the application stage.

Other policies to be addressed would be Policy CC3: Adaptation to Climate Change, CC5: Waste Minimisation and storage and CC4: Decentralised Energy, which sets out that "Any development

*of more than 20 dwellings and/ or non-residential development of over 1,000 sqm shall consider the inclusion of a CHP plant, or other form of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.”*

Given the recent national government initiatives to reduce the reliance on traditional carbon intensive sources of heat and power, a centralised heating system should be explored in the form of a Combined Heat and Power (CHP) plant and backup boilers.

With regard to PV infrastructure, as a minimum we would expect a feasibility study to be carried out to assess the viability of renewable technologies like PVs, solar thermal, heat pumps etc, and where feasible, they are adopted. Green roofs/walls welcomed, however the balance between green roofs, PV and amenity space for residents on terraces would need to be justified in any submission along with the required maintenance regime in order to ensure that such features contribute to biodiversity, attenuation and air quality in the future.

Finally, with regard to new dwellings, Policy H5 requires that all new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations, and all major new-build residential development should be designed to achieve zero carbon home.

It is not clear from the pre-application submission whether it is the intention for the development to be carbon neutral. Where this is not the case the supporting text to Policy H5 (Para. 4.4.6) states *“where homes are not designed to be carbon neutral, this will mean as a minimum a 35% improvement in the dwelling emission rate over the 2013 Building Regulations plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30-year period).”* Such carbon offsetting would need to be secured within a S106 agreement and verified independently.

Suggested resources are:

<https://www.architecture.com/-/media/files/Climate-action/RIBA-2030-Climate Challenge.pdf>

<https://www.architecture.com/-/media/GatherContent/Test-resources-page/Additional-Documents/RIBASustainableOutcomesGuide2019pdf.pdf>

As made clear in recent appeal decisions within the borough and reinforced by officer and Elected Member expectations, many aspects of sustainability would be required to make the development policy compliant anyway, and therefore would be considered neutral factors in the overall balance. On the other hand, an ambitious approach to these key aspects of sustainability would be afforded significant weight in the overall balance and be expected to ensure the development is fit for purpose on the future and assists in responding to the borough's declared climate emergency.

j) S106 & Community Infrastructure Levy (CIL)

The development would be liable to Community Infrastructure Levy (CIL), however, in line with the Council's Charging Schedule (2015) there would be a charge for residential at £156.71 per sqm. A completed CIL form would be required as part of any formal submission and plans identifying the area colour coded to identify the area for which the floorspace calculations have been based on.

In addition to affordable housing (discussed in Section 3(a)), an obligation/financial contribution for employment, skills and training both for construction would be required (see the Employment, Skills and Training SPD, 2013 for further details:



<https://www.reading.gov.uk/media/1064/Employment-Skills-and-Training-Supplementary-Planning-Document-Adopted-April-2013/pdf/Employment-Skills-And-Training-Supplementary-Planning-DocumentApr13.pdf>

It is recommended that contact is made with Reading UK CIC who are the economic development arm of the Council and who will be able to advise on developing an Employment, Skills and Training Plan.

There may be the requirement for other obligations including with respect to open space, air quality, and carbon offsetting.

## 5. Procedural points

*Submitting a valid application* - Prior to the submission of any future application you are advised to consider the Council's validation checklist ([available via the website](#)), which provides details as to the level and nature of information required to validate an application. The determination period for the Council to consider your application will only begin once all the necessary information to validate the application has been received.

*Wider consultation in advance of any submission* - In line with paragraph 189 of the National Planning Policy Framework, you are encouraged to engage with the local community prior to the submission of any application. Please detail in your submission what consultation you have undertaken with the local community.

As per the LPA's validation requirements (2015), the following information would be required for an application of the type proposed:

### Part 1:

Mandatory national information requirements (Forms, Ownership certificates/declaration/ site plan, block plan, fee, CIL form, Design and Access Statement, SUDS)

### Part 2:

- Item 1: Affordable Housing Statement
  - Item 2: Air Quality Statement
  - Item 4: Contaminated Land Survey & Report (Minimum Phase 1)
  - Item 5: Daylight/Sunlight Assessment (including internal light levels of flats where it may not be immediately obvious if internal levels are sufficient)
  - Item 6: Ecological Survey & Report
  - Item 7: Energy Efficiency Statements
  - Item 9: External Lighting Details (if proposed or required by the proposal)
  - Item 10: Flood Risk Assessment
  - Item 11: Heads of Terms Proposals - s106 Legal Agreement
  - Item 13: Landscape Principles
  - Item 14: Materials Details
  - Item 15: Noise & Vibration Impact Assessment
  - Item 16: Open Space Statement
  - Item 18: Plans and Drawings
- 
- i. In addition to the mandatory information, a streetscene should be provided
  - ii. Floor plans to evidence the stated CIL floorspace figures (including existing)
  - iii. Sections & Levels (i.e. in relation to adjoining properties)
  - iv. Any plans produced at greater than A3 paper size are to be provided in paper copy



- Item 20: Sustainability Statements
- Item 22: Transport Assessment, Transport Statements & Travel Plans
- Item 23: Tree Surveys
- Item 24: Utilities Statements
- Item 25: Vehicle (Car & Cycle) Parking and Servicing (including waste storage and collection) Details
- Item 27: Viability Appraisal (Including fee, if seeking to provide less than 30% affordable housing on site or a tenure mix which is below policy compliance)

As the application would be for a major development any recommended for approval under our current scheme of delegation would require it to be automatically be heard by the Planning Application Committee (PAC). There is currently delegated authority for officers to refuse major developments.

As described, a S106 Legal Agreement will be required to be completed to secure affordable housing, employment and skills training plans, contribution towards public realm improvements in the area, and other obligation which may be identified.

## 6. Conclusion

In principle, the development appears to have overcome a key concern upheld in the previous appeal which was the removal of the Locally Listed Building on site. Furthermore, the added retention of 5 Craven Road will assist in ameliorating and wider affects to the character and appearance of the area. Affordable housing provision, suitable parking and access are also aspects of the scheme which are likely to be addressed. With regard to Trees and landscaping, more information is required along with assurances to these concerns raised. The access onto Erleigh Road is identified as a concern from both a Heritage and Natural Environmental perspective. Careful and consideration and planning of this element of the scheme can ensure the scheme results in a overall improvement in the site's relationship to surrounding roads. When it comes to what the proposed development will feel and look like from the street, the scale and design of the new building is yet to be drawn up in any detail. Officers would encourage a imaginative design approach to such new buildings, given a replication of design features on those existing red brick buildings or Edwardian villas nearby is perhaps limited. A design which compliments and reimagines may work. The Council is happy to engage further on such aspects.

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

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

Yours Sincerely,

*BConlon*

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

(via email only)