

COMMITTEE REPORT

BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

READING BOROUGH COUNCIL

ITEM NO. 8

PLANNING APPLICATIONS COMMITTEE: 29 April 2015

Ward: Abbey

App No.: 150120

Address: Cooper Reading BMW, Kings Meadow Road, Reading

Proposal: Demolition of all existing onsite buildings and structures, including remediation, 352 new homes in a mix of sizes in three new buildings up to 28 storeys in height, reception, concierge, library, clubroom, community rooms, business centre, residents' fitness centre, residents' storage and associated other ancillary community uses, Up to 523 sqm of commercial floorspace (Use Classes A1, A2, A3, B1 or D1) in 2 units, 308 cycle parking spaces, 118 car parking spaces including four car-club spaces and private residents' storage, Access and service access, outdoor amenity space and landscaping (amended description).

Applicant: Lochailort Reading Ltd.

Date received: 24 February 2015

Major Application: 13 week target decision date: 26 May 2015

RECOMMENDATION:

REFUSE planning permission.

Reasons:

1. The development fails to demonstrate that adequate provision has been made for the proposed Mass Rapid Transit (MRT) route and a footpath/cycleway and suitable mitigating landscaping within the northern part of the site. The MRT route is a major strategic transport project in the Borough and this site is at the junction of the network, which also needs to incorporate an MRT stop. A detailed design has not been provided within the proposal to indicate how the complex configuration of the various transport requirements can be provided. The development will therefore fail to provide a comprehensive strategic transport solution, contrary to:
 - figure 6.2 of the RCAAP: 'Station/River Major Opportunity Area Strategy' (which shows the MRT route on the north and western sides of the application site)
 - Policies RC1 (Development in the Station/River Major Opportunity Area), CS20 (Implementation of The Reading Transport Strategy), CS21 (Major Transport Projects) and CS23 (Sustainable Travel and Travel Plans)
 - Policy CS5 (Inclusive Access) which requires suitable provision to be made for all usersand paragraphs 35 and 41 of the National Planning Policy Framework.
2. The application does not show a suitable or achievable external landscape strategy which will accommodate strategic transport requirements in reason for refusal 1 above and also adequately mitigate the impact of this very large development on the streetscape. Furthermore, the area proposed for landscaping improvements to the western side of the development does not show a suitable or deliverable design for a scheme in terms of landscaping, public realm and disabled persons' access, or is this land under the ownership/control of the applicant. The development will therefore fail to provide a comprehensive public realm contrary to:

-Policy CS7 (Design and the Public Realm), RC5 (Design in the Centre), and RC14 (Public Realm) concerned with providing a suitable enhancement to the public realm in major proposals in the central area

-Policies CS38 and DM18 which require suitable provision of mitigating landscaping

-The Council's Tree Strategy, which requires an increase in tree canopy cover in the area for amenity and air pollution reasons and paragraph 58 of the NPPF (sixth bullet point)

3. Due to its excessive, bulk, scale, height and massing, the proposal would produce a development which would dominate and fail to respond to the surrounding prevailing height which would have an adverse impact on the urban form in this part of the town. This development is inappropriate in that it would cause significant harm to short-range views and the related public realm by overbearing and dominating the surrounding streets and buildings, due to its appearance which is out of scale and context with them, and to the detriment of the enjoyment of Kings Meadow, contrary to:

-Policy CS7 (Design and the Public Realm)

-Policy RC5 (Design in the Centre)

-Policy RC13 (Tall Buildings)

-Policy RC14 (Public Realm)

and paragraphs 60 and 64 of the NPPF

4. Due to its excessive bulk, scale, height and massing, the development would fail to meet the requirements for tall buildings in Reading as set out in adopted planning policy. Significant harm would be caused for the following reasons:

-The development would appear as an alien and dominant addition to views within and beyond the town. Harm to medium-range views would include views from the railway and the Thames Parks, where the presence of the tower buildings would appear foreboding and out of scale and lead to a confusion of the location of the centre of Reading;

-Harm at medium-range distances includes harm to the settings and views experienced in relation to Heritage Assets; some of which the supporting information has failed to accurately quantify; and

-In longer-range views, the presence of the towers would be prominent in the skyline and landscape, particularly alien to the open and sensitive environment of the Thames Valley, and again, the presence of a development apparently 'competing' with the taller buildings of the central area will be noticeable and therefore harmful (particularly if illuminated) from locations as far away as the Chilterns AONB by failing to provide a coherent 'massing dome' (as set out in the RCAAP) for taller developments next to the station, for way-finding and a sense of place.

The height, massing and design of the development represents an inappropriate overdevelopment when compared to the context set for a single building to function as a 'district landmark' in the Development Plan and Reading Station Area Framework and insensitive development, to the detriment of views at all distances, contrary to

-Policies RC13 (Tall Buildings) and RC1h (Napier Road Junction)

-Policies for protecting the views within the Thames Valley: CS8 (Waterspaces) and CS37 (Major Landscape Features and Strategic Open Space)

-The Reading Station Area Framework (SPD, 2010)

5. The application has failed to demonstrate, via an appropriate wind/microclimate assessment (with any mitigation which may be necessary), that the proposed wind environment will be suitable for the intended use of the various elements of the site and the immediate site environs. In particular, it is not clear that the two proposed communal roof gardens situated on top of the podium between the towers will be acceptable for amenity use by residents, given that they may be subject to potentially

severe downdraughts and they are enclosed on three sides in an area which will be subject to high levels of noise and air pollution from the railway. Balconies on the southern side of the building may also suffer in air quality and noise terms. The application has therefore failed to ensure that these external amenity areas of the site are acceptable for their intended purpose(s) and provide good quality public spaces which are inviting, contrary to policies:

- CS7 (Design and Public Realm)
- RC5 (Design in the Centre)
- RC9 (Living in the Centre)
- CS13 (Tall Buildings)
- CS34 (Pollution and Water Resources)
- DM4 (Safeguarding Amenity)
- DM10 (Private and Communal Outdoor Space)
- DM19 (Air Quality)

and the paragraph 56 and 69 of the NPPF

6. The submitted daylight/sunlight analysis is incomplete in that sufficient information has not been supplied to indicate that light levels to all flats would be acceptable. Furthermore, no information has been presented on the effects of the development in sunlight/daylight/overshadowing terms on either the dwellings at Kingfisher Court or 'The Lodge' (22 Kings Meadow Road). The light analysis has therefore failed to demonstrate the acceptability of the development either in terms of causing detriment to amenity for the occupants of the flats themselves or occupiers of the nearest affected residential dwellings. As such the proposal is contrary to policies:
 - RC1 (Development in the Station/River Major Opportunity Area)
 - RC5 (Design in the Centre)
 - RC13 (Tall Buildings)
 - DM4 (Safeguarding Amenity)
7. The design of the proposal does not include adequate provision of space within the site for the loading, unloading, and manoeuvring/turning of HGVs, clear of the highway. This will lead to either the stationing of vehicles within the highway or HGVs reversing into the highway, causing congestion and danger to motor vehicles, pedestrians, cyclists and the safe and efficient operation of the proposed MRT system. For these reasons, the non-provision of on-site turning space is unacceptable and contrary to:
 - Policy DM12 (Access, Traffic and Highway-Related Matters)
 - figure 6.2 of the RCAAP: 'Station/River Major Opportunity Area Strategy' (which shows the MRT route on the north and western sides of the application site)
 - Policies RC1 (Development in the Station/River Major Opportunity Area), CS20 (Implementation of The Reading Transport Strategy), CS21 (Major Transport Projects) and CS23 (Sustainable Travel and Travel Plans)and paragraph 41 of the National Planning Policy Framework.
8. The application has failed to provide affordable housing with this application, either within the development or elsewhere within the Borough. The development is therefore contrary to policies CS16 (Affordable Housing) RC9 (Living in the Centre) and the Council's SPD, 'Affordable Housing' (2013).
9. The application has not been supplied with a suitable Retail Sequential Test for the commercial uses (excluding offices) which is necessary due to the location of the site outside of the Primary Shopping Area and the Central Core, as indicated in the RCAAP. Therefore the application is contrary to:
 - Policy CS25 (Scale and Location of Retail, Leisure and Culture Development)
 - Policy RC6 (Definition of the Centre)

And paragraph 24 of the National Planning Policy Framework.

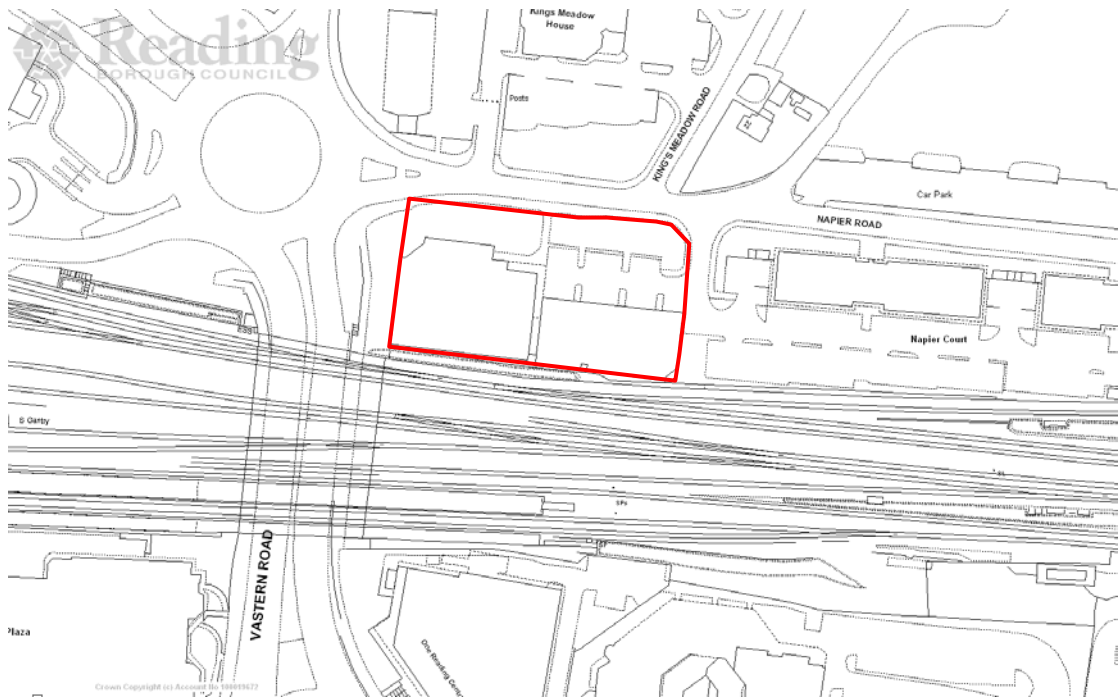
10. Due to the failure to complete a S.106 legal agreement to secure a S.106 legal agreement for an Employment and Skills Plan; a car club; managed public access to an upper floor observatory or public art, the proposal will not mitigate its impacts on the social and economic infrastructure of the Borough, contrary to policies CS9, CS13, CS23, RC13, DM2, DM3 and the Council's SPDs on 'Sustainable Design and Construction' and 'Employment and Skills'.
11. The development fails to provide a suitable housing mix and will therefore fail to contribute towards mixed and balanced communities or a suitable range of residential accommodation within central Reading and no justification for not doing so has been supplied. Accordingly, the application is not in accordance with Policy RC9 (Living in the Centre).

Informatives:

1. Positive and proactive requirement
2. No formal pre-application discussions took place (timeline to be supplied)
3. Plans refused
4. The policies referred to above are from the following Development Plan documents
5. This is CIL-liable development
6. Reason for refusal 10 above could be overcome with a suitable S.106 agreement or unilateral undertaking
7. Access rights

1. INTRODUCTION

- 1.1 The application site extends to 0.45 hectares and consists of a narrow site adjacent to the north embankment of the Bristol-Paddington railway line at the edge of Central Reading. The site is currently a car dealership, which includes a one/two storey building and parking/turning areas. To the west is the short north-south section of Vastern Road which continues under the railway bridge and the roundabout which links that road with Vastern Road, George Street and Kings Meadow Road. To the north is Reading Bridge House and Kings Meadow House, and beyond that, on the banks of the Thames, is a residential development, Kingfisher Court. To the north-east of the site is a residential dwelling, 'The Lodge' and Kings Meadow, one of the town's Thames Parks, which contains the Kings Meadow Baths (Listed Grade II). To the east of the site is a two storey office development in a series of three blocks, known as Napier Court. Further away lie Clearwater Court, (the Thames Water building), Luscinia View (the residential development with the blue roofs at the eastern end of Kings Meadow), the Reading Central development on Forbury Road and the First Great Western multi-storey car park on the opposite side of the roundabout.
- 1.2 The application site is identified site in the Reading Central Area Action Plan (the RCAAP, 2009) for a single landmark building for residential use, B1 office use, or a mixed use for both.



(not to scale)

2. PROPOSAL

- 2.1 This is a full planning application to demolish the present building and associated structures and erect a development which consists of a large, four-storey 'podium' with three separate residential tower buildings rising from it. The podium itself would house the servicing and communal areas for the residential use, retail uses and the top of the podium would include communal amenity spaces for the residents of the flats. The development leaves an area to the front of the application site (north side) for some landscaping. Indicative landscaping is shown to the west of the site between the red line and Vastern Road, but for clarity, this does not form part of the application site.
- 2.2 The towers themselves are similar in design and are designed to appear as a family of three (in fact, this scheme was previously referred to by the applicant as, 'The Three Sisters'). The towers have a roughly 'lozenge' shape plan, in order to maximise light penetration to the units towards the north. In terms of external appearance, the towers would be nearly identical, until the top floors, where there is a variation on a theme, with the towers having slightly different rustications and different domed roofs. The three towers step down slightly, with the tallest tower being 28 storeys (overall equivalent height), the middle one 26 storeys and the lowest, 24 storeys. The mix of accommodation would be primarily 2-bedroom units, with some one-bed units. 118 car parking spaces are proposed in a multi-storey arrangement within the podium. The tenure of the flats is not clear, but there is no agreement regarding affordable housing at this time.
- 2.3 Supporting information supported with the application is as follows
- Design and Access Statement (DAS)
 - Planning Statement
 - Objectively assessed housing needs report
 - Five-year housing land supply report

- Economic appraisal model
- Transport assessment (TA)
- Travel plan
- Flood Risk Assessment (FRA)
- Statement of community involvement (SCI)
- Sustainability Statement
- Noise assessment report
- Utilities and drainage report
- Lighting design feasibility report
- Accurate Visual Representations (AVR) study (CGIs)
- AVR study: computer generated illustrations
- Townscape/landscape and visual impact assessment (report)
- Archaeological desk-based assessment (DBA)
- Heritage Setting Statement
- Heritage statement
- Ecological impact assessment report
- Affordable housing viability report
- S.106 Heads of Terms letter
- Affordable housing statement
- Viability appraisal and report
- Retail sequential assessment
- Daylighting/sunlight analysis
- Kitchen extract strategy

2.4 This planning application is being reported to the Committee as this is a Major application.

3. RELEVANT PLANNING HISTORY

3.1 There is various planning history related to the car dealership, but this is not relevant to the current planning application. In connection with the current proposal, the following planning history is pertinent:

140700	Request for a pre-application scoping meeting	Two initial scoping meetings were held with the applicant in late 2013 and early 2014. Following the second scoping meeting, officers produced a note for the developer, advising of locations for views analysis to be undertaken. In the same note, concerns were raised for the inconsistency of the emerging proposal with adopted planning policy and officer advice was that a development of circa. 15 storeys would be more appropriate.
141815	Screening opinion request	Opinion provided 8 December 2014, advising that this development would not be subject to the Environmental Impact Assessment (EIA) Regulations.

3.2 As can be seen from the table above, no formal pre-application process was entered into with officers, notwithstanding repeated suggestions and requests to do so.

4. CONSULTATIONS

(i) Statutory consultation

RBC Transport Strategy objects to the application.

- Given the traffic levels already on the Borough's transport network as a result of the car dealership, the development will not produce a significant increase in trips.
- The site is located on the boundary of Zones 1 and 2 of the Parking and Design SPD and given proximity to the town centre and the railway station, Zone 1 has been used. The provision at 0.35 spaces per dwellings is technically an under-provision, but given the sustainability of the site, availability of public car parks for visitors and parking restrictions on streets and with the proposed car club, the parking level is considered to be acceptable.
- No provision for parking for the commercial units is provided and this is acceptable in this location.
- The servicing arrangement is unsatisfactory, as there is no turning provision within the site, which will lead to unsafe vehicle movements on the highway.
- The design of the scheme does not indicated sufficient room for the construction of the proposed MRT route and related cycleway/footway and landscaping and will therefore prejudice the delivery of this infrastructure.

On the basis of the servicing concern and the MRT safeguarding concern, two reasons for refusal are provided.

The **Environment Agency** does not object to the application. Recommends conditions and that the Council undertakes the sequential test for flood risk as the site is in Flood Zone 2.

Network Rail objects to the application at this time, due to concerns over access arrangements and requests a meeting with the applicant and officers (*Officer comment: these are unlikely to be planning-related concerns*).

(ii) Non-statutory consultation

Crossrail has confirmed they do not wish to comment on the application.

English Heritage objects to the application. By virtue of its scale, height and proximity, the proposal will adversely impact on the setting of the Grade II Listed Building 'Kings Meadow Baths' and also a wide range of Heritage Assets are likely to be affected.

RBC Housing Development advises that affordable housing is required as a result of this development and has been in discussions with the applicant regarding this.

RBC Environmental Health raises concerns for the development on fire safety grounds (*Officer comment: these are likely to be matters controllable under the Building Regulations*).

The **RBC Natural Environment Team (Tree Officer)** has raised concerns for the inclusion of trees in planters and questions why trees cannot be rooted into the ground.

The **Council's Retained Ecologist** raises no objections, subject to conditions.

The **RBC Emergency Planning Officer** and the **Access Officer** have not provided a comment on the application.

RBC Parks and Leisure advises that the area in front of the lido is due to be landscaped and licenced to the swimming pool operators. The plan is to improve the quality of this space and Parks and Leisure expect activities connected to the baths to be hosted in this area. Given this is being licenced and maintained by the operators and needs to relate to the baths, it is not appropriate to relocate this activity. Proximity to the children's play area is also important in supporting the intensified use. Given the Council is trying to improve the green and recreational infrastructure in this space, concern is raised that this very large development will have a negative impact on this area of the Meadow.

The **RBC Sustainability Team** does not object to the application. However, they raise some concerns over the provision of good, balanced energy distribution within the building and noise, ventilation and transport issues.

The **RBC Environmental Protection Team** objects to the application on the basis of the roof gardens at podium level, which will be subject to unacceptable levels of pollution and noise for their intended use. Other comments are as follows:

- The submitted reports indicate internal noise levels will be suitable
- Air quality mitigation measures will be required, as the site is located as a hot-spot within the Air Quality Management Area (AQMA)
- High-risk site for contamination, considering past land-uses
- The submitted external lighting report is acceptable
- A number of conditions recommended in terms of internal noise, air quality mitigation, contamination, construction/demolition management, control of noise and dust in construction, hours of working in construction and no bonfires, lighting controls.

South Oxfordshire District Council objects to the application on the basis of the potential visual impact of the development from within South Oxfordshire. The buildings are extremely tall and distinctive and might have a significant visual impact on rural areas within South Oxfordshire, which includes parts of the Chilterns AONB.

Wokingham Borough Council has advised that they do not wish to comment.

Thames Water has no objections and recommends conditions and informatives.

Design Council CABE: A CABE Design Review was undertaken on 9 September 2014 and formal advice was issued by CABE on 22 September. Officers were not supplied with plans of the scheme shown to CABE, but the applicant's agent has confirmed that in terms of height, they understood CABE's advice to be that the developer should, "be bolder at (both) skyline....in celebrating this key location". Accordingly, the application proposal has raised the ceiling of the storey below the penthouses and added a storey to the penthouses themselves providing us a larger

'top' to decorate the towers. The details of CABE's input to the design process are discussed in the Appraisal section.

Reading Civic Society makes the following points:

- Understand the site is designated for tall buildings, but even with the stepping down, this would dominate its close neighbours
- Not opposed to tall buildings per se, but from a point of view of human scale, the perception could be overwhelming from ground level
- The development has taken note of the Tall Building Strategy's (TBS) advice for placing mass at the base and buildings being slender further up, so support and welcome the separation of the upper levels into the three towers
- The development could provide a replacement landmark for the 'Metal Box Building'
- Concern for overshadowing of the lido and King's Meadow
- Use of the podium is a good use of space, which conforms to the TBS and allows the decorative top storeys glazed penthouses to be accommodated
- Welcomes the architectural detailing (chamfered corners, cladding, complex masonry details, columnar form with the capitals and differently-shaped caps).

Overall, note that CABE support, providing the building is well-designed. Whilst supporting the design, would wish to see the overall height reduced to take account of human scale and to avoid some of the inevitable overshadowing. However, believe that the design is preferable to a lower, solid shape providing the same amount of accommodation.

Reading UK CIC has supplied commentary in relation to Employment and Skills Matters (see S.106 discussion below).

Berkshire Archaeology advises that a condition for an archaeological written scheme of investigation is produced be attached to any permission.

Caversham and District Residents Association (CADRA) objects to the application and identifies the following harm from the development:

- Harm will be caused to Reading, Caversham and the River Thames, as the towers will appear dominant and cause 'sky line pollution'.
- Building Form, as the extreme height of the building will impact on both the immediate area and more distant views.
- Overshadowing and wind effects, as the towers could cast long shadows which would reduce the experience of daylight for Caversham residents with homes close to central Reading - north of Christchurch Meadows and in Lower Caversham.
- Parking and vehicles on site, towers would exacerbate pressure on public parking nearby which is already under pressure.
- Public Realm and landscaping, the tree planting proposed is in above ground tree planters and that this will make a limited and inadequate contribution at street level.
- Appearance and building style, neo classical design is unfitting for what would be the tallest buildings in Reading if approved.

Caversham GLOBE objects to the application for a number of reasons:

Excessive height. Needs to be reduced by at least 50%. Buildings of this height would cause overshadowing and wind tunnel effects on parts of the nearby Thames Parks green corridor, including the listed King's Meadow baths. Visible from a great distance they make an unwelcome intrusion far and wide in the surrounding area.

Hideous design, not suited to Reading or the UK - it looks more like buildings in North Korea. Gross over-development of this small site.

The design and height of such massive tower blocks would have a very negative impact on the surrounding area including the listed King's Meadow baths and the nearby Thames Parks green corridor, especially King's Meadow.

Inappropriate Landscaping. The proposal for all trees along the Kings Meadow Rd/Napier Road frontage to be planted in containers would result in stunted trees which would need permanent irrigation to survive at all. They would never be able to grow sufficiently high to help screen and soften the buildings. Ground-planted trees should be mandatory on such a development in such a prominent location. If necessary underground services should be moved to enable ground planting.

Parking and traffic. GLOBE Members are concerned that lack of sufficient parking for so many apartments and all residents and visitors could lead to overspill onto neighbouring roads including residential roads in Caversham. The additional traffic on Vastern Road and Reading Bridge junction would cause even more congestion.

The **Crime Prevention Design Advisor (Thames Valley Police)** raises a number of concerns with the proposal, including secluded areas, lack of separation of function of some spaces, narrow pedestrian passing places, lack of CCTV/entrance controls and poor internal circulation arrangements.

The **Royal Berkshire Fire and Rescue Service** advises of the possible need for fire hydrants and of access requirements, to be covered under the Building Regulations.

The **Civil Aviation Authority (CAA)** does not object to the application but provides advice, including provision of aviation warning lighting on the roofs of the buildings.

M&G Real Estate (acting for Prudential, which has a property interest in the Reading Central/Forbury Place development) has written to object to the proposal. Forbury Place (Phases 1-3) ranges from 8-11 storeys. M&G is a long-term and substantial investor in the Reading Property market. They are of the view that the scale and height of the proposed scheme is inappropriate for its location and therefore object to the proposals.

Their concerns are:

- The scheme does not comply with tall buildings policy in the RCAAP. Whilst the site is within policy area RC1h for a landmark, it is not appropriate for a tall building as defined by Policy RC13. The three buildings of this height are clearly not appropriate in this location. Tall buildings will only be

considered in the identified tall building potential locations RC13a, RC13b and RC13c. (*Officer comment: it should be noted that the RC1h site is within and at the eastern edge of the RC13a Station Area [tall building] Cluster*).

- The design and scale of the proposal is unacceptable in urban design terms. Requests that the proposal is rigorously tested against RC13 requirements and considers that the development does not contribute to creating high quality views or consider its context and is bulky, showing an overdevelopment of its site.
- RBC has sought and secured high quality design in proposals in the central area in recent years. Considers that the proposal does not represent the high quality of accommodation that the Council is seeking and is incongruous in scale and design with the surrounding area and will unacceptably detract from the careful approach developed for the central area in the Core Strategy and the RCAAP.
- Considers that planning permission should be refused for failing to meet the policy requirements of RCAAP Policy RC13.

(iii) Public consultation

The application was advertised in the local press and site notices were erected in 15 locations in the environs of the application site. The application has been advertised as affecting views within a conservation area, affecting the setting of Listed Buildings and a Scheduled Ancient Monument and not being in accordance with the Development Plan.

At the time of writing, 61 letters or emails of objection have been received. Any further letters or emails received, raising new issues, will be reported to your meeting. The issues raised by objectors can be summarised as follows:

(a) Character of the area/design

- Completely excessive and out of character with the area.
- Development is completely disproportionate to the local area.
- The buildings are drastically out of scale with the surrounding area. Scale of the proposed development should be viewed as overdevelopment.
- The sheer scale of the development on the tiny footprint is excessive and prejudicial to the site and surrounding area.
- The proposed design is not at all sympathetic to the town centre, parkland or river.
- The development will dominate Kings Meadow and the ancient site of the Abbey and the Forbury.
- The design and height of such massive tower blocks would have a very negative impact on the surrounding area including the listed King's Meadow baths and the nearby Thames Parks green corridor, especially King's Meadow.
- Damaging to the beauty of the Thames

- The mass and scale of the building is out of context with the surrounding area and will ruin the views of the river from the north bank. The height is more appropriate for central London than central Reading.
- Considers that when the land was designated for housing in the local plan this is not the density of development that was envisaged.
- The proposal is monstrously out of proportion with the sky line, surrounding buildings and is on an inhuman scale. It would be seen from almost every aspect of the water meadows, Christchurch Meadows and way beyond. It will dwarf the lovely Station Reading has provided for its residents and is totally out of keeping with the surrounding area.
- Three tower blocks of an unpleasing design will deter promoting the natural environment of this area (e.g. redevelopment of the King's Meadow Baths seeks to make this a pleasant riverside destination).
- Design does not sit comfortably with the design of any buildings in its vicinity, with the proposals out of proportion to the adjacent buildings.
- It is a very ugly building, juxtaposed with some lovely modern buildings and totally overwhelming them.
- Given proximity to railway line, it will have a negative impact on the general perception by visitors of our town.
- They will dominate views from many parts of town. Such a prominent location should be developed in a much more sympathetic manner and they should not be so high.
- Visible from great distance they make an unwelcome intrusion far and wide in the surrounding area.
- Reading should be purged of architectural mistakes, this would be adding to them. Three blocks of this size are simply not appropriate for a town of this size. They are not only ugly to look at but ridiculously tall. This is Reading, NOT London.
- Reading was a strong Victorian town, it is now neglected, its heritage in appalling conditions. This is completely out of proportions for the town centre and for the surrounding landscape. Is this what we need? Do we really want Reading to become the LA of the South?
- Why is it that everywhere else tower blocks are being pulled down and Reading council want to start building them - they are already in a fairly isolated location in terms of other residential buildings and reports have proved that living in tower blocks can be isolating.
- Should be built out of town not in town
- They will totally dominate the skyline

(b) Specific appearance/design

- Several objectors describe the buildings as ugly.
- These look like prison blocks.
- The scheme totally lacks any kind of architectural vitality. Any amount of elaboration by way of Greek labels and cornices, false capitals and the like will fail to make a good scheme.
- Considered to be a very dated design.
- A dreadful piece of architecture to be squeezed into Reading.
- Concrete Jungle springs to mind.

- These buildings will be an eyesore, Reading is not a town full of high rise buildings so these will stand out and look ridiculous.
- The proposal looks incredibly ugly - too tall, too imposing, leaving a feeling of real claustrophobia where there is at present no tall high rises above ten or so stories. Would rather see the sky, than have concrete and tarmac all around as a welcoming image from the North of Reading (e.g. walking from Caversham).
- In the past, building development in Reading has been ugly. Obviously this council wishes to carry on this ghastly trend.

(c) Specific height/design

- The proposal upsets the outline plan for tall buildings south of the railway and heights decreasing further out, thereby breaking up the coherence of Reading's skyline and creating an overbearing presence beside the flat riverside parkland of King's Meadow.
- If Reading wants to make this obviously phallic statement then please in the centre of the town or somewhere else out near the M4 not next to the river Thames.
- Height is excessive, unnecessary and clearly out of line with recent development in the locality (Clearwater Court, Reading Station & Reading Bridge House). Existing large buildings in this region are less than half the height of the proposed development - it is completely out of scale for the location.
- When Clearwater House was built, Thames Water were made to reduce the height as it wasn't in keeping with the surrounding area. 28 storeys is definitely not in keeping with the area.
- The height will dominate the skyline. A reduction by at least half, more likely to below 10 storeys would be more in keeping with the local development profile.
- Height is more in keeping with central London, Manchester or Birmingham -
- Height will be a blot on the Reading landscape and an eyesore
- The excessive height is intimidating/overbearing to its surroundings
- Proposal will create a carbuncle Manhattan City-style development domineering over the landscape, visible from Henley and beyond.
- Proposed height and number of floors is excessive, and ostentatiously so. Not the right area for such tall structures, which will loom like some behemoth - a triple tower over the station, and heritage areas.
- RBC should not lose sight of its obligation to existing residents and our local community, to protect our existing environment

(d) Nature of housing proposed/ wider housing implications

- Luxury housing will be too expensive for the vast majority who are desperate to find suitable new housing and not affordable.
- No social housing. At a time when social housing is at a premium with 10,000 on the housing list this development if allowed would be a slap in the face to all who need housing.

- Proposal will not provide the much-needed family homes within Reading and will not help to alleviate the housing issue in the town.
- The lack of parking and proximity to the train station seems to convey that these are expensive apartments for those who will commute to London to work and so are unlikely to want to add positively to the Reading community.
- The flats will sell well to overseas investors and make more dormitory space for ex-London commuters. What can be done to ensure homes in this site are occupied by the existing population of Reading and thereby reduce the pressure on the existing housing stock?
- Reading will become a town with high-rise, high-density and high-cost apartment living which will drive out those families which seek to make Reading their place to live and work, and this cannot be deemed acceptable.
- The Council should consider an alternative approach that offers smart but affordable housing for people that already live and work in the Caversham/Reading area.
- Concern that proposal would add to an increasing transient population in Reading, less likely to contribute to/care about the local area - suggest a provision ensuring a proportion of properties are either owner occupied or long-term let.
- Units appear to be for rental only with no ownership and no community commitment to the area. The area will soon run down in terms of cleanliness.
- Cannot see it being attractive purchasers or retail outlet owners and looks likely to become a 1970s style London estate building.

(e) Impact on amenity of surrounding occupiers and areas

- There will be intrusion into the privacy of residents of existing three storey-residences in Kingfisher Place, whose gardens and balconies are not currently overlooked.
- The light blocking is a very particular issue for Kingfisher Place residents - not at all swayed by the 'gaps between the towers' argument, especially as Kingfisher Place houses are mostly north facing.
- Cause overshadowing and block light to occupiers of Deans Farm
- The height of the proposed buildings will cut out the sun for most of the day, affecting the enjoyment of the present playing fields. The river side provides an amenity for the people of Reading (e.g. sports, events, children's playground)
- It will create very long shadows in the area, creating gloom for lots of people.
- Such tall buildings will overshadow not only the riverside but also the Abbey Quarter which is set for refurbishment.
- Ruin the whole look and feel of the Deans Farm area, which overlooks the Thames and across King's Meadow Park.

- The construction traffic will lead to a tremendous amount of disruption in the short to medium term. Major construction works in this area will likely bring Reading to a standstill.
- Detrimental to quality of life of existing local residents who need to get to the station and Tesco by road.
- It will create excessive wind corridors local to it.

(f) Amenity of future occupiers

- Poor outlook for those elevations facing each other; and those with wider views will only see the railway, office blocks, a traffic roundabout and the rooftops of the Tesco store.
- Whilst the proposed provision of resident facilities within the buildings is noted, and the proximity of Kings Meadow and its facilities is acknowledged, the provision of external spaces and outdoor family facilities is lacking.
- Site far too small for the modern living conditions known to be necessary for well-being.
- Is there any provision for additional green space to take account of the increase in demand on local parks?
- The people who live there would feel socially separated as there are few people living anywhere near to it.

(g) Amenity - other & resultant impacts

- High density homes at Chatham Place, Station Hill and this development will add a great deal of air pollution through increased traffic & noise pollution.
- Noise, air, and night pollution and general increase in human activity will affect the local wild life, already the owl population is diminishing.

(h) Transport - Additional vehicles/congestion and related matters

- Additional burden on Napier Road roundabout would cause further congestion and delays on the local road network
- Pedestrian volumes moving from this site to the Station will increase dramatically and further negatively impact traffic flows at peak times via the controlled crossings.
- Selfish plan that will not benefit the existing Reading residents and quite the opposite; create traffic mayhem.
- Local road network needs a complete overhaul before adding more buildings.
- Should the developers make no parking provision whatsoever, or be prepared to fund and deliver a third bridge for Reading, congestion concern might be alleviated.

(i) Transport - Parking

- 118 car parking spaces seems completely inadequate for 353 dwellings and will lead to local parking problems in the area, e.g. Caversham or King's Meadow
- Why is there not at least one bike space per estimated resident?

- For the size of this development there are too many cycle parking spots.

(j) Transport - Pedestrian/highway safety

- Generate traffic along Napier Road which will be an impediment to pedestrian safety.
- Only a single road in and out of the site.
- Vehicle access onto Kings Meadow Road/Napier Road, which already backs up with traffic from existing flats and the superstore at peak times will be difficult and will add to the pressure on the Vastern Road roundabout which is often gridlocked.
- Suggest condition ensuring heavy goods vehicles cannot arrive at site during rush hours for the construction.

(k) Impact on local facilities/businesses

- To continually put more and more people into the area without improving or increasing the capacity of the associated infrastructure is madness
- This area already has a severe shortage of school places so this will have further impact (*Officer comment: contributions towards education infrastructure improvements would be secured via the Community Infrastructure Levy, were permission to be granted*)
- The reduction in overcrowding brought about by the recent railway improvements would be lost because so many additional people would be commuting into London (*Officer comment: the station upgrade was predicated on the station improvement requirements needed, plus the developments envisaged in the RCAAP*)
- Increased traffic congestion will affect trade at Tesco

(l) Flooding

- Located in the flood plain, it will worsen the flooding which we have experienced over the last ten years and could cause a catastrophic situation.

(m) Loss of existing use

- Proposed change of use from commercial to largely residential is a further blow to business activity in the centre of Reading and adds to concerns about the detrimental shift towards residential and leisure and the consequential reduction in employment opportunities in the town.

(n) Trees and landscaping

- Not a blade of grass is proposed.
- A plan to put trees into containers is cruel. They would not be a pretty sight, would need watering and maintenance.

(o) Lack of public consultation

- Concern that there has been very limited public consultation and awareness regarding this planning application despite it being the tallest and largest development in the town. This is in stark contrast to the amount of coverage given to 'The Blade' building when built which has a far more appropriate setting in the town centre and has a more innovative and appropriate design. For example, there is no information on this website about the closing date for comments; the only media coverage was an artist's impression with no information referencing the planning application; I walk past the site twice daily and have not seen any clearly displayed yellow signs.
- Apparent lack of compliance by Reading Council in respect of advertising this major planning application. Not seen any advert in the local paper (and no copy advert is provided on this site as would be expected) and the advertisements provided near to the site are inadequate. Walk over Reading Bridge to the station every day and have not passed any adverts. Anticipate this leaving Reading Council open to judicial review challenge.
- Proposal does not appear to have been well publicised hence the majority of people living in Reading and Caversham will not know of this proposal. Suspicion that if they did, there would be fierce objections.

(p) Other matters

- Will not increase the look of homes at Heron Island (*Officer comment: views of property or effect on values are not planning matters*)
- Whatever anyone says in objection to the plan, the Supreme Leader (the Puppet Master) will do exactly what suits his personal interests (*Officer comment: not clear what point this objector is making*)
- Suggestion that in time future residents will create a private garden on King's Meadow and prevent any future events taking place on King's Meadow as a result (*Officer comment: should such a situation arise, the Council as landowner could control this, or as a change of use of the land, this would be a planning concern and enforcement action could be taken*)
- Although Reading has extremely tough housing targets to meet, surely there are enough empty brown field sites in the town centre which could be developed to avoid the creation of problems elsewhere in the town. Why not make better use of what's already lying empty and built?
- Following on from the social problems which developed in high rise developments built in the 1960's, what is to stop those same social problems developing within this development?
- Such a large building close to the railway would exclude any possible additional future expansion of the lines into the Station (*Officer comment: neither Crossrail nor Network Rail have objected on this basis*).

(iv) Supports

At the time of writing, three public letters of support have been received, making the following points:

- Proposal would make a significant contribution to this area as well as Reading overall.

- Although a large and challenging scheme, it's designed by a highly regarded architect and its delivery would help provide a bold statement and make efficient use of the strategic land area around the station.
- Great idea considering the lack of supply for properties in the town centre.
- Very bold and exciting. The towers should be built.
- A great use for the site.
- Will meet an overwhelming demand.
- Allocation of parking spaces is sufficient in this case.
- Create a recognisable landmark, standing as a testament to the renewal of the town centre and the prosperity of the town itself.

Other supporting comments received:

Thames Lido supports the application as the proposal would make a significant contribution to this area as well as Reading overall. If Reading is to reach its geographical and economic potential, there needs to be investment in the town and its environs. It is a large and challenging scheme, but has been designed by a highly regarded architect with a strong track record. Its delivery would help provide a bold statement that the town is prepared to take on the competition and make efficient use of the strategic land area around the station.

Haslams estate agents cite an overwhelming demand for town centre property to live in or rent out to tenants. These 352 homes will be in heavy demand. The allocation of parking spaces is sufficient as many owners or tenants would not have cars, based on our experience. This development would be a recognisable landmark, standing as a testament to the renewal of the town centre and the prosperity of the town itself.

(v) Applicant's public consultation

The applicant held a public exhibition on 27 November 2014, 4pm-7:30pm at Reading Town Hall in the Waterhouse Chamber. This was a single event and no other days or times were offered. Usually, the developer of a major development such as this would offer a number of opportunities for residents to attend, for instance an event over three to four days, including daytimes and evenings and at least one day on a weekend.

Furthermore, officers have concerns with the way this exhibition was publicised to local residents. The applicant sent a letter to residents on 10 November 2014 informing residents that a public consultation evening would be arranged ('date to be advised shortly') and for residents to contact the applicant with any queries about the proposals. However, no communication was offered to residents about the time, date or venue of the event until a copy of the Press Release (produced at 12:00 on Friday 21 November and headed 'for immediate release') was only hand-posted to residents on 24 November, just three days before the exhibition was due to take place. This press release supplied did not give the time, date, or venue of the exhibition either, although the letter to local businesses did (accidentally getting the date wrong). This lack of notice was also unnecessary, as the Town Hall confirms that the booking for the Waterhouse Chamber was confirmed on 10 November, i.e. the same day that the letter to residents was sent out. The lack of

notice of the exhibition to local residents was unacceptable and appears to have been avoidable.

Accordingly, officers advise that the public consultation arrangements were not in accordance with the Council's Statement of Community Involvement (SCI). Officers are particularly concerned that the nearest affected residents - which include the Kingfisher Place residents - were given no notice of the exhibition and this is likely to have affected turnout.

There are further concerns with the applicant's consultation. No specific consultation with residents associations, local or community groups was undertaken, as required in the Council's SCI. This is required for applications which are significant and/or sensitive. This application is both; being greater than 50 dwellings, given its height and scale and given that the applicant is proposing a development which is not in accordance with (departs from) the adopted Development Plan. The applicant did not discuss their consultation arrangements with officers.

The applicant's SCI draws attention to paragraph 66 of the NPPF which states:

"Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably".

For the above reasons, this aspect of the NPPF is not complied with.

In summary, the applicant offers that for those attending the event, there were the following responses, but for the reasons above, given the applicant's wide publicity of the proposal in the media and poor notice given to residents, this is likely to be an inaccurate representation of public feeling on the application (and clearly the public objections received appear to substantiate this):

- There were 72 attendees, of which 31 provided comments.
- The applicant advises that 85% of respondents expressed support or strong support for the proposal
- 3% of attendees opposed the proposal
- 55% of respondents commended the design
- Some attendees were concerned for the lack of parking

5. RELEVANT PLANNING POLICY AND GUIDANCE/LEGISLATION

- 5.1 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 5.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 In terms of impact of development on the setting of a scheduled monument, securing the preservation of the monument 'within an appropriate setting'

as required by national policy is solely a matter for the planning system. Whether any particular development within the setting of a scheduled monument will have an adverse impact on its significance is a matter of professional judgement. It will depend upon such variables as the nature, extent and design of the development proposed, the characteristics of the monument in question, its relationship to other monuments in the vicinity, its current landscape setting and its contribution to our understanding and appreciation of the monument.

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

5.5 National Planning Policy Framework (NPPF) (March 2012)

The following chapters are relevant:

1. Building a strong, competitive economy
2. Ensuring the vitality of town centres
4. Promoting sustainable transport
6. Delivering a wide choice of high quality homes
7. Requiring good design
8. Promoting healthy communities
10. Meeting the challenge of climate change, flooding and coastal change
11. Conserving and enhancing the natural environment
12. Conserving and enhancing the historic environment

5.6 Other Government Guidance which is a material consideration

CABE and English Heritage: Guidance for Tall Buildings (2007)

HM Government: Crowded Places: The Planning System and Counter-Terrorism (2012)

5.7 Reading Borough Local Development Framework: Core Strategy (January 2008)

CS1 (Sustainable Construction and Design)

CS2 (Waste Minimisation)

CS3 (Social Inclusion and Diversity)

CS4 (Accessibility and the Intensity of Development)

CS5 (Inclusive Access)

CS7 (Design and the Public Realm)

CS8 (Waterspaces)

CS9 (Infrastructure, Services, Resources and Amenities)

CS10 (Location of Employment Development)

CS11 (Use of Land for Alternative Uses)

CS15 (Location, Accessibility, Density and Housing Mix)

CS16 (Affordable Housing) **including update to policy, 2015**

CS20 (Implementation of The Reading Transport Strategy (Local Transport Plan 2006-2011))

CS21 (Major Transport Projects)

CS22 (Transport Assessments)

CS23 (Sustainable Travel and Travel Plans)

CS24 (Car/Cycle Parking)
CS25 (Scale and Location of Retail, Leisure and Culture Deveopment)
CS26 (Network and Hierarchy of Centres)
CS29 (Provision of Open Space)
CS33 (Protection and Enhancement of the Historic Environment)
CS34 (Pollution and Water Resources)
CS35 (Flooding)
CS36 (Biodiversity and Geology)
CS37 (Major Landscape Features and Strategic Open Space)
CS38 (Trees, Hedges and Woodlands)

5.8 Reading Borough Local Development Framework: Reading Central Area Action Plan (RCAAP) (2009)

RC1 (Development in the Station/River Major Opportunity Area). The site is identified in the RCAAP as site RC1h Napier Road Junction
RC5 (Design in the Centre)
RC6 (Definition of the Centre)
RC9 (Living in the Centre)
RC10 (Active Frontages)
RC13 (Tall Buildings) (the site is at the eastern extremity of the RC13a Station Area Cluster)
RC14 (Public Realm)

5.9 Reading Borough Local Development Framework: Sites and Detailed Policies Document (2012)

SD1 (Presumption in Favour of Sustainable Development)
DM1 (Adaptation to Climate Change)
DM2 (Decentralised Energy)
DM3 (Infrastructure Planning)
DM4 (Safeguarding Amenity)
DM10 (Private and Communal Outdoor Space)
DM12 (Access, Traffic and Highway-Related Matters)
DM18 (Tree Planting)
DM19 (Air Quality)

5.10 Supplementary Planning Documents

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

5.11 Other Reading Borough Council corporate documents

Reading Open Space Strategy (2007)
Reading Tree Strategy 2010
Local Transport Plan 3: Strategy 2011-2026 (2011)

6. APPRAISAL

Main Issues:

6.1 The main issues are:

- (i) Principle and land uses
- (ii) Strategic transport issues
- (iii) Assessment against policy requirements for tall buildings
- (iv) Residential layout assessment
- (v) Other transport matters
- (vi) Flooding
- (vii) The Community Infrastructure Levy (CIL), affordable housing and S.106

(i) Principle and land uses

Loss of car sales use

6.2 The site is currently in use as a car dealership and has been for a number of years. Car sales uses are *sui generis* (unique) uses. The site is allocated in the RCAAP for alternative uses and there are suitable alternative sites for these types of facility (for instance, South Reading). An objector is concerned for the loss of job opportunities within these uses, but this use is likely to be re-located within the Borough and in any event, there is under-used land in the Council's employment areas. In summary, there is therefore no objection in principle to the loss of the present and established use of the site and no conflict with Core Strategy Policy CS11.

Proposed uses

6.3 The RCAAP identifies sites within the Station/River Major Opportunity Area. This site is proposed on the edge of that area, as Policy RC1h as follows:

"RC1h, NAPIER ROAD JUNCTION: A landmark building, containing residential and/or offices is appropriate for this site, which may contain an active commercial use on the ground floor. An acceptable dry access scheme must be part of any development on this site".

6.4 The proposal is predominantly residential floorspace, with a maximum of 523 sq.m. commercial floorspace, in use classes A1, A2, A3, B1 or D1.

Residential

6.5 The application has been supplied with a large amount of supporting information in relation to housing need and the need for this amount of residential in the Borough. A brief summary of the points made and officers' views on each follows.

6.6 The basic premise is that the applicant argues that the Council does not have a demonstrable Five Year Housing Land Supply, and for that reason the

presumption in favour of sustainable development applies, and the development should therefore be approved. Other than for flooding reasons, it is advised that this Council does not refuse applications on the basis of land there being 'no need' for housing in a specific location. In any event, officers advise that the Council has a five year housing land supply.

- 6.7 A five year housing land supply has three major inputs, and the applicant makes assumptions about each of these that officers do not necessarily agree with.
- Level of need (the methodology proposed is not sound and as a consequence, over-estimates the annual housing need for the Borough)
 - Buffer to be applied (the applicant argues that the buffer should be 20% on top of the annual housing need, but this 20% level is normally for LPAs which consistently fail to meet their housing completions. This is not considered to be true of Reading)
 - Projected delivery (there are a number of inconsistencies with how the applicant is counting the projected supply of housing units and in most cases, these suggest that fewer units are coming forward than is actually the case).
- 6.8 For these reasons, your officers disagree with the applicant's assertion that the Borough does not have a five year housing land supply.
- 6.9 The applicant is then attempting to suggest that the Council's Development Plan is out of date and therefore the 'presumption in favour of sustainable development' in the NPPF applies. This would mean granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (when assessed against the policies in the Framework taken as a whole); or specific policies the Framework indicate development should be restricted." (NPPF, para 14). This is disputed in the Planning Policy Requirements section below.
- 6.10 To conclude on the matter of housing need, officers advise that there is no concern over housing land supply and furthermore, there is no over-riding need to provide such a number of units on this site.
- 6.11 Paragraph 3.26 of the planning statement points to Figure 9.1 of RCAAP which indicates that is the only site in any of the Major Opportunity Areas (MOAs) which is indicated for delivery in the 'short term' and the applicant appears to use this as contributory reason for the site coming forward. However, the Council's LDF Team confirms that this timescale was added because at the time (circa. 2007), the owner of the site was in contact with the Council regarding development options and the site was the smallest MOA site and in single ownership. Accordingly, it was able to be brought forward relatively easily.
- 6.12 This report will be considering the consequences of attempting to provide such a number of housing units in terms of height, bulk, massing, design, views, etc. impacts. Therefore in land use terms, development of the site for a residential/retail scheme (with ancillary services such as parking) is compatible with RCAAP Policy RC1h. However, the application does raise other conflicts in terms of Policy RC1 (and RC1h specifically) and these are discussed in detail below.

Retail uses

- 6.13 Whilst no Retail Impact Assessment (RIA) is required to be submitted (as the 'main town centre use' aspect is less than 1,000 sq.m.) a retail sequential test is required for any of those uses excluding offices, because the location is outside the primary shopping area and central core as defined in RC6 and outside any other existing identified retail centre in the Borough. The applicant has supplied a document entitled a 'sequential assessment', but this does not systematically evaluate the appropriateness of this site against other available sites, outside the town centre retail area. This is a validation issue and failure to supply this information is contrary to Policy CS25 (Scale and Location of Retail, Leisure and Culture Development) and paragraph 24 of the NPPF. In the absence of this information, officers advise that this should result in a reason for refusal of the application.

(ii) Strategic transport issues

- 6.14 The NPPF requires development plans to set out opportunities for ensuring modal shift to more sustainable travel modes and protecting land for strategic transport projects (paragraphs 35 and 41). In relation to this site, this is reflected in Policy CS20 which requires implementation of the Reading Transport Strategy and CS21 which seeks the realisation of major transport projects and RC1 which requires land to be safeguarded for mass rapid transit infrastructure. The tall buildings policy, RC13, includes reference to such developments coming forward in a 'coordinated manner'.
- 6.15 In pre-application discussions directly with the Council's Transport Strategy Team (the Highway Authority), the applicant's transport consultant has been advised of the importance of maintaining suitable space for the strategic protected public transport route which is shown on the RCAAP plan (Figure 6.2). This clearly shows the site on this route, with a transit stop. Furthermore, point iv) of Policy RC1 requires that development in the Station/River Major Opportunity Area will safeguard land which is needed for mass rapid transit (MRT) routes and stops.
- 6.16 On the submitted Site Plan, a three metre wide footpath/cycleway is shown on the northern side of the development and nothing further. This is insufficient for the requirements of the MRT (a separate lane is required which runs to the roundabout), the footpath/cycleway and the necessary landscaping which will be required not only to be replaced in the streetscene, but enhanced.
- 6.17 On the western edge of the building, the main pedestrian entrance to the development is on the red line boundary of the site. There is then a Council-owned area of highway land to the west of this main entrance (see plan at the end of this report). Within this area, the site plan indicates landscaping, entrance steps and ramps for disabled persons' access. There are a number of concerns with this arrangement:
- Firstly, the applicant does not own or control this land, therefore he cannot confirm how and if these elements shown will be delivered, funded, etc.
 - As the applicant does not own this land, he is assuming access rights over the land, which the Council's Valuer advises do not exist

- The landscaping shown is not acceptable as the northern extremity of the planting bed shown is within the MRT lane required to reach the roundabout; and
 - The ramps shown for mobility-impaired people are pushed a long way to the edges of the large flight of steps shown on the plans. This is not demonstrating equality of access in terms of Policy CS5.
- 6.18 The DAS, the indicative landscaping scheme and the plans are very vague on these matters and given the strategic significance to the Borough of achieving the MRT system, it is necessary for all developments to respond suitably to the requirements. The applicant has submitted these documents which are probably best described as 'aspirational'. However, as is the case when development sites are affected by the requirements of detailed transport infrastructure (for example Station Hill 2 and 3 and developments along the A33 MRT route), this is a situation where the configuration of the transit system and the achievement of the public realm must be planned and brought forward together and this is best handled by detailed dialogue and ultimately, agreement with the Council, in order to provide the best outcome in design terms.
- 6.19 The line for the MRT has been protected since the 1980s and these projects tend to take time to secure and pool funding, bring different sections of the route together and ultimately, design and implement. However, there is significant movement on the cross-town MRT route at the time of writing. The Council has been allocated indicative funding of £15.6m as part of the Thames Valley Berkshire Local Economic Partnership (LEP) Growth Deal with Central Government for implementation of the East Reading Mass Rapid Transit (MRT) Phase 1 scheme during 2017/18-2018/19. Phase 1 runs from the proposed East Reading Park & Ride site (also allocated indicative funding by the LEP) at the A3290/Thames Valley Park Drive roundabout to Napier Road, running parallel to the Great Western railway line. In addition, the Council has been allocated revenue funding by the LEP to identify a preferred option for the East Reading MRT Phase 2 scheme, running along Napier Road to Reading Station, i.e. including the application site. The road widening scheme to the north of the proposed Swan Heights development site could either act as a standalone scheme in conjunction with the Phase 1 MRT route, or form part of a wider Phase 2 MRT scheme.
- 6.20 This is therefore an important strategic public transport route which is now set to be delivered in the short-term and it is disappointing and surprising that the applicant has not worked with the Council to ensure that a suitable design of development can be provided, and the site plan supplied with the application is not acceptable. The detailed design of the MRT Route is a current task of your highway officer and a draft layout plan for the MRT route in this area is being worked up and hopefully, this will be available in time for your meeting. The application's design for the public realm in this area therefore cannot be relied on and does not provide sufficient room for all the necessary strategic transport requirements and is therefore contrary to policies CS20, CS21, RC1, RC14, and RC1 and the NPPF's clear instruction (paragraph 35 and 41) for land to be set aside so as not to prejudice the delivery of such important strategic transport projects.

(iii) Assessment against policy requirements for tall buildings

Overview of relevant policy

- 6.21 The site is currently in car sales use, comprising a functional car showroom building of between 1.5-2 storeys with open car sales space and a separate three deck parking block. The use and the design of the building appears reasonable in its context, but rather commercial in appearance and given the general height of the buildings around (typically 5-6 storeys, with Reading Bridge House at 11 commercial storeys), it appears somewhat squat, although the office complex to the east (Napier Court) is only two storeys high. Car sales uses are generally more suited to locations away from the town centre, on radial routes or commercial areas. In any event, the RC1h designation envisages a much denser, higher development. Therefore, the removal of the present buildings and the redevelopment of the site more intensively is acceptable in principle. The Development Plan and supplementary guidance in the Reading Station Area Framework (RSAF) guide how intensive that redevelopment should be.
- 6.22 The applicant's DAS relies heavily on statements made in the Council's Tall Buildings Strategy. This document was a supporting document to the RCAAP. It provided evidence for the policies in the RCAAP including for the location of tall buildings, which the applicant offers that his development complies with. However, the application needs to be considered in the context of the actual wording of the Development Plan (relevant policies of the Core Strategy, the RCAAP and the SDPD) and the RSAF.
- 6.23 The RBC Tall Buildings Strategy identified a cluster around the station where the tallest buildings (those on Station Hill), opposite the new Station Square are intended to command the dominant position in the cluster and be of equal importance, for the Reading skyline as a whole. The eastern and western tall building zones identify point makers, such as The Blade (and potentially Kings Point) in the east and Fountain House and Chatham Place in the west. In this way, the skyline of the town is balanced and the appropriate scale or build-up of scale is attributed to the locations of the greatest importance and sustainability. This is related to the increased densities for the central area, as set out in the RCAAP.
- 6.24 In the RSAF, the aspirations for heights are set out in Chapter 6, "Density, Mass and Height". This site is indicated for "Medium-High Density" (Figure 6.7) (as opposed to "Very High" for the more central sites in the tall building cluster around the Station) and suitable for a "Local Landmark" building (Figure 6.8) (as opposed to a "District Landmark"). Therefore the RSAF has provided more detailed advice on the exact function of the landmark. This SPD was published almost two years after the RCAAP. Figure 6.10 of the SPD is the suggested height isochrones in the central area (entitled "tall building location guidance") and indicates that a lower overall height would be appropriate for this site, which is at the eastern extremity of the RSAF area. The RSAF is clear, then, in indicating that in height and density terms, this site is to be developed at a significantly smaller scale than the tallest buildings which would be sited immediately adjacent to the station. These various figures will be shown at your meeting.

- 6.25 Whilst exceptions to the general reductions in height of buildings away from the station area are possible, these would need to be carefully controlled. Paragraph 6.26 of the RSAF states that:

“Landmark buildings may exceptionally ‘puncture’ the benchmark heights [8 storeys on this site, as set out in the RSAF, Figure 6.8] and the general ‘dome’ massing pattern in order to create emphasis and to mark important places. It is not envisaged that every potential landmark location in Figure 6.9 will necessarily provide a landmark building”.

- 6.26 The DAS does not attempt to explain how the proposal fits with the height dome in the RSAF, as set out in Figure 6.5 (Massing Strategy).
- 6.27 Regarding the number of buildings which could be accommodated on the site, the applicant’s DAS also advises that the RSAF indicates that the site could be developed for two tall buildings. This considered to be a deliberate mis-reading of the document. The RSAF includes ‘illustrative proposals’ and both pages 80 and 81 show a much lower building to the east of a taller tower, thereby indicating one tall building.
- 6.28 From the brief policy examination above, therefore, the development opportunity of this site is considered to be for one (single) landmark building (not three towers, which most people will interpret as being ‘three buildings’), which may, by virtue of its height be some half the height of the buildings at the centre of the Station Area Cluster. It should nevertheless be capable of functioning as a gateway building, or in the words of the RSAF, a ‘local landmark’. The applicant’s views analysis suggests that the building should be a dramatic and prominent building; this is considered to be an exaggeration of the policy requirements.

CABE/Design Council design review

- 6.29 A proposal very similar to this was subject to a CABE Design Review in September 2014. Due to a lack of any involvement of the Council in setting up the review and the lack of notice offered to Council officers in relation to the date of the review, the review, unusually, took place without the input of your planning officers and no documentation of the proposal reviewed was supplied to officers. Formal written advice from CABE was issued by letter later that month and this letter is appended to this report. The applicant has taken the views of CABE to be a positive endorsement of their scheme and considers that he has adjusted the scheme in accordance with CABE’s comments in this planning application submission.
- 6.30 On the issue of height, CABE indicated that, *“We support the proposed height provided that it is a well designed building with high quality residential accommodation”*. In the paragraph above, the letter says, ‘providing that the architectural quality of the tall buildings is outstanding’. Your officers were surprised and disappointed with this statement from CABE and although their remit is design-based, they were nevertheless aware of the planning policy considerations for tall buildings on this site.
- 6.31 The applicant has therefore continued developing their design theme and assumes that CABE are supportive of the scheme. It should be noted that soon after the planning application was submitted, the applicant contacted CABE with a view to setting up a ‘design workshop’. It is unclear what this would have achieved, as such workshops usually take place at pre-

application stage and inform the evolution of the design, but in any event, given that the applicant is not allowing officers further time beyond the statutory 13 weeks to consider the application, then this cannot take place.

- 6.32 CABE has concerns that the bulk, massing and also the height needed to be mitigated, as they had concerns for views and local townscape. The applicant has responded to this by changes to the appearance of the tower elevations, re-designing the balconies and altering the podium level and making the capitals (roof areas) more pronounced. As officers were not supplied with plans for the scheme presented to CABE, it is not clear whether the overall height in the application scheme ultimately increased or decreased.
- 6.33 CABE has raised concerns for the size and bulk of the podium, indicating harm to townscape and views and the 'disconnection' of the tower buildings from the ground. To help alleviate this concern, the application proposal has allowed the towers to become more sculpted in the podium area.
- 6.34 At lower levels, CABE's concerns were for the location of the main entrance (which was originally on the north side), questioned the usability of the gardens at the podium level and encouraged a more integrated landscaping design at ground level.
- 6.35 The above concerns are CABE's main points and they will be covered in the sections below.

Detailed planning policy requirements

- 6.36 Firstly, it is important to the applicant's 'planning balance' in favour of this proposal that many of the relevant policies are considered to be out of date and therefore are not in accordance with the NPPF and accordingly the NPPF should apply, not the Development Plan. However, this approach is not reflective of paragraph 196 of the NPPF:

"Determining applications

196. The planning system is plan-led. Planning law requires that applications

for planning permission must be determined in accordance with the development plan,37 unless material considerations indicate otherwise.38 This Framework is a material consideration in planning decisions."

- 6.37 In terms of the Sites and Detailed Policies Document, the Inspector into the SDPD's examination considered compliance with the NPPF within his report, and concluded that, *"the SDPD has been positively prepared, and accords with the National Planning Policy Framework subject to the inclusion of MM1"* (MM1 being the inclusion of a policy reflecting the presumption in favour of sustainable development, which was subsequently inserted as Policy DM1). It should be noted that this compliance identified includes Policy SA17, the designation of Major Landscape Features, which the Inspector specifically considered to be in line with National policy in paragraph 136 of his report.
- 6.38 The SDPD Inspector did not make any determination regarding the compliance of policies within the Core Strategy and Reading Central Area Action Plan. However, the Council's LDF Team reviewed the compliance of all development plan policies in Reading with the NPPF as part of the SDPD

process, and is content that, with three notable exceptions, all policies within those documents comply with the approach of the NPPF and should be accorded full weight. The exceptions are those policies relating to the settlement boundary (in particular CS6) and to the provision of housing (CS14). The Council recognises that to comply with the NPPF, it needs to review CS14 to identify objectively assessed development needs, and is in the process of identifying those needs in conjunction with neighbouring authorities.

Policy RC13 (Tall Buildings)

6.39 Policy RC13 is the Council's tall buildings policy, contained within the adopted RCAAP. The wording of Policy RC13 is as follows:

"In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above. Tall buildings will meet all the requirements below.

i) Within Reading Borough, tall buildings will only be appropriate within the 'areas of potential for tall buildings' as defined on the Proposals Map. These areas are as follows:

RC13a Station Area Cluster

RC13b Western Grouping

RC13c Eastern Grouping

Figure 8.2 gives an 'at a glance' diagrammatic indication of the principles for each area set out in the following sections.

ii) RC13a, Station Area Cluster:

A new cluster of tall buildings with the station at its heart will signify the status of the station area as a major mixed-use destination and the main gateway to, and most accessible part of, Reading.

Tall buildings in this area should:

- Be located at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes;*
- Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm;*
- Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms;*
- Be designed to fit within a wider planning framework or master plan for the area, which allows separate parcels of land to come forward at different times in a co-ordinated manner."*

6.39 Section v) of Policy RC13 then sets out criteria for all tall building proposals:

“v) In addition to the area-specific requirements, all tall building proposals should be of excellent design and architectural quality, and should:

- Enhance Reading’s skyline, through a distinctive profile and careful design of the upper and middle sections of the building;*
- Contribute to a human scale street environment, through paying careful attention to the lower section or base of the building, providing rich architectural detailing and reflecting their surroundings through the definition of any upper storey setback and reinforcing the articulation of the streetscape;*
- Contribute to high-quality views from distance, views from middle-distance and local views;*
- Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style;*
- Avoid bulky, over-dominant massing;*
- Preserve and, where appropriate, enhance the setting of conservation areas and listed buildings;*
- Use high quality materials and finishes;*
- Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm;*
- Locate any car parking or vehicular servicing within or below the development;*
- Maximise the levels of energy efficiency in order to offset the generally energy intensive nature of such buildings;*
- Mitigate any wind speed or turbulence or overshadowing effects through design and siting;*
- Ensure adequate levels of daylighting and sunlighting are able to reach buildings and spaces within the development;*
- Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting;*
- Provide managed public access to an upper floor observatory and to ground floors where appropriate, and ensure that arrangements for access within the building are incorporated in the design stage;*
- Incorporate appropriate maintenance arrangements at the design stage”.*

6.40 This application will be discussed in terms of these requirements in turn in detail below, where relevant.

Creation of a tall building cluster, which is 'coherent' and sustainable next to the station.

6.41 The proposal does not fulfil these requirements of Policy RC13.

6.42 The height of the proposed towers is arguably the most significant and obvious attribute of this proposal, so it would be useful to set out the heights involved and compare them to recent tall building proposals in the central area.

6.43 Regarding the Station Hill redevelopment, Members will recall that two extant outline planning permissions exist. In the applicant's submission, there seems to be some inconsistency as to which ought to be relied on as a 'benchmark'. For clarity, Station Hill 2 (permission 090622) is an extant outline permission, but is very unlikely to be built, primarily because large sections of its design were predicated on a different station entrance proposal being delivered. Therefore significant alterations to the scheme would be required, possibly to the extent that a fresh planning application would be required in any event.

6.44 Station Hill 3 (permission 130436) was granted outline planning permission in January 2015. This is a much more modest and importantly, lower proposal in terms of its overall height and development is expected to commence this year, with demolition and the first (reserved matters) planning application expected shortly. Officers therefore advise that there is far greater certainty that the SH3 scheme will be implemented.

6.45 The upper and lower height parameters for the tallest building in the permitted SH3 scheme, Plot C, are approximately 22-28 commercial storeys. If built, Plot C (on the basis of current planning permissions) is likely to be the tallest building in Reading. The table below offers a brief comparison:

Plot C, Station Hill 3	109-128m AOD	(the height is a range due to the parameters set by the outline planning permission)
Building B1, Station Hill 2	168m AOD	(the Scale of the building envelopes were fixed in this outline planning permission)
Thames Tower	103.3m AOD	(with roof extension)
Swan Heights: Tower 1 (nearest station) Tower 2 (middle) Tower 3 (furthest)	136m AOD 131m AOD 125m AOD	

6.46 It can be seen from the table above that all three of the Swan Heights towers have the potential to be 'the tallest building in Reading'. The tallest tower would be almost 100 metres tall above natural ground level at the site, dwarfing the immediate surroundings. The scale of the proposal significantly departs from the above policy aspirations. The height would mean that the development would unacceptably compete with the SH3 scheme but also with other development proposals coming forward for the Western and Eastern [tall building] Groupings in the town (see Policy RC13) and this would provide a confusing and incoherent cityscape, contrary to

the clear aspirations of the policy documents, which are for a defined and tall town centre with gradual reductions in height and two further, concentrated groupings, either side of the town centre. The effect would be of an over-sized development, capable of being seen from views from long distances and sensitive landscapes (from the Chilterns AONB and possibly, to a lesser extent the eastern edge of the North Wessex Downs AONB in the Mapledurham area) which would skew the viewer's perception of where the centre of Reading is and produce an isolated development of three tall buildings, unrelated to the tall building core of the town. These aspects are considered in more detail below.

- 6.47 Pages 18 and 19 of the DAS discuss skylines and the contribution of skyscrapers and tall building clusters, citing international examples (Manhattan, Chicago, the City of London and Pudong (Shanghai)) and UK examples. This section suggests that the relationship between tall buildings and their city clusters is random and that there is no over-riding concept for a fixed relationship between towers. It is not the purpose of this report to examine international planning policy, but in the majority of UK examples, there are planned strategies for the careful integration of new tall buildings within urban areas, it is not 'left to chance', as alleged. As described above, Reading has set out a clear strategy for the location of tall buildings and the tallest buildings in the Borough will be next to the station.
- 6.48 Were this proposal to be built, the presence of these very tall buildings in this location would be confusing and in fact, disorientating for visitors to Reading and contrary to not only all Development Plan documents, but also all relevant Council Corporate documents (such as Reading 2020) which have consistently sought the intensification of height and density closest to the station. Policy RC13 requires that tall buildings should, "*be located at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes*". Policy CS7 at a very basic level, requires all development to provide 'legibility'. The ability to 'read' the urban environment and find your way is lost if the urban form is illogical and draws you towards a dense, tall development that is not, in fact correctly signalling the centre of town.
- 6.49 In summary regarding the suitable development potential of the site, the site is an outlier to the Station Area tall building cluster, as defined in the RCAAP and clearly an outlier when seen in the context of Figures 6.6 and 6.8 of the RSAF. It lies outside the IDR and is therefore separated from the town centre which is the most sustainable location for high density proposals. At most, it offers the opportunity for one relatively modest 'tall building' to act as a local landmark to signal the gateway to the town. The proposal at the scale proposed, militates against the creation of the ultimate aim of this part of Policy RC13, the creation of a coherent tall building cluster next to the station.

Avoiding bulky/over-dominant massing and contribution to high quality views (distant, middle, local).

- 6.50 CABE's advice was that more work was required to mitigate the cumulative impact of the bulk, massing and height on the local townscape. The applicant considers that his 'fine-tuning' of the design has overcome CABE's concerns in this regard. However, officers consider that there is continued harm from this development in terms of its scale, bulk, massing and height.

Many objectors, some from considerable distances away from the site (for example the Deans Farm area) are concerned for the development having an adverse impact on views experienced within the Borough.

- 6.51 This is a major planning application and as such, must be accompanied by a Design and Access Statement. The Design and Access Statement was accepted in good faith and the application validated. However, it has become evident to officers in assessing the submitted material that the DAS is missing basic sections which are required by Planning legislation. There is no section on use or scale, and whilst height is referenced, density is not. Indeed, there is no design case made for extreme intensification of land use aside from a few references to viability and sustainability. The DAS therefore fails to justify the height and massing rationale for the development; however, given the time which has now elapsed since the validation of the application, it is not considered to be helpful for officers to attempt to invalidate the application now. Nevertheless, it is a significant shortcoming of the supporting documents, and these matters are not picked up in other documents such as the planning statement, which focuses attention on planning policy or the views documents.
- 6.52 The DAS ('Building Form' section, pages 9-11) is at pains to stress the development of the design by referring to the three towers reducing the overall mass of the development. This section describes the other development options as, 'single slab form'; 'two towers' and 'three towers'. It is therefore considered that the development, which would be read from most vantage points as 'three towers', does not conform to the RC1h designation for the site which requires a single building. What is being proposed in this planning application, in your officers' view, is three separate tower buildings which share a four storey servicing podium.
- 6.53 Page 12 (only) of the DAS provides a very brief rationale for the approach chosen for the height of the towers. The DAS states that the options of various storeys have been 'tested', but it does not say how and does not present any clear evidence of this. The DAS also makes the incorrect assumption that a landmark and a tall building are the same thing. A more focused analysis of the locality reveals that there are a range of conditions which the proposals need to respond to and that nearby buildings are of different scales and heights rather than a homogenous 'boxy' whole, as suggested in the DAS. Overall, the DAS is considered to be very poor and fails to provide reasoning for the scale, height or appearance of the development.
- 6.54 The shortcomings with the design and in particular the massing and height, have implications beyond the immediate site environs. The views study which has been conducted has produced 28 'before' and 'after' views, the latter showing a simple blue silhouette of three individual tower buildings. In terms of their coverage, the views offer a reasonable indication of the overall impact of the scheme, although some appear to have been chosen so that no clear view is quite possible (the view from Forbury Gardens, for instance). However, notwithstanding, as will be presented at your meeting, the majority of these 28 views are considered by officers to be adversely affected. This views analysis has been supplemented by very detailed 'rendered' computer-aided images and in your officers' opinion these show a very lifelike representation of the development from various key vantage-points. These will also be presented to you.

- 6.55 The development would be prominent in the majority of views affected. Even in the longer-range views, the proposal would continue to have the effect of an alien form with intrusion into the townscape/skyline (for instance, Dunsden Green in South Oxfordshire) and there would be the confusion as to the centre of Reading. The applicant's planning statement dismisses CABE's concern for impact on long-range views, by remarking, *"..this [concern for impact on views] is self-evident and any negative connotation associated with such a statement is erroneous. When one designs a tall building, one expects and wants it to be seen from long distance views"*. This indicates a rather cavalier attitude to the sensitivity of the views which would be affected in the Borough.
- 6.56 The development's height may have the effect of dwarfing a number of other tall building proposals in the town centre from various angles, for instance, The Blade. This is very clearly in conflict with many relevant adopted documents, which seek the tallest buildings in the Borough next to the station, and the site is comparatively distant. This leads to officers' view that such a development would not be relevant or appropriate to the town when seen from these middle distances. As an example, the view from Caversham Bridge is particularly unfortunate, as it looks like there is a second 'Centre of Reading' or a competing cluster. The applicant's townscape/landscape and visual impact assessment document identifies the river corridor as a principal and defining element in the landscape, together with the associated parkland areas. This is agreed. However, the document then advises that this landscape has a moderate susceptibility to the proposed change (i.e. the proposal). For the reason above, this is not accepted.
- 6.57 From these middle range distances, the development would appear significantly and excessively out of scale with the surrounding buildings, which are a maximum of 11 storeys. The DAS has taken the Development Plan's lack of a storey 'cap' on development to mean that there is effectively 'no limit' to the height of tall buildings in this area and that some 15-17 (residential) storeys greater than the next tallest building in the area (Reading Bridge House) cannot be resisted by the Council. Not only is this predicated on a selective mis-reading of the policy documents, the DAS also fails to explain the difference in morphology/urban grain in the area between the proposal and nearby structures and spaces. The surrounding buildings are 2-11 storeys and whilst they are large in terms of floorplates, they respond to their sites in different ways.
- 6.58 The application's towers would loom over buildings which are themselves already large and tall structures in the area (such as the Reading Central development, now 'Forbury Place') and this is best illustrated by one of the applicant's CGI images, which appears to be superimposed on a photo taken from above the Whiteknights Laundry site on George Street. This image shows a very real 'disconnect' between the location of the Station Hill development (which conform to the cluster requirements) and the application proposal. Even if opportunities came forward for sites to be developed in between these sites, they would need to show the gradual stepping away in height from the station, as advocated in the RCAAP and RSAF.
- 6.59 A particular concern is the impact on Kings Meadow, which is one of the Thames Parks and an important open space in the central area. The development would overbear and overshadow (at various times of the year

in the afternoon) the westerly end of the Meadows, nearest town. This will be unnecessarily detrimental to the enjoyment and use of this part of the Meadows, which is important in connection to the lido re-use and contrary to policies which seek to retain its openness and function, as amplified by the Council's Parks and Leisure response to the application. This is covered in reason for refusal 3.

- 6.60 In a letter produced by the applicant's planning agent on 30 March, it is stated that the visual representations of the buildings in the views studies to be accurate, but also supply the curious statement that, "...we do not believe that those [visual] effects would be materially different should any design of another tall landmark building be proposed". This is a strange statement, as it is assuming things which have clearly not been tested and presented and also, officers do not agree with the supposition. A building of, for instance, 15 storeys would not have the same impact on views at all distances (short, medium-range and long distances) and indeed, at long distances, there is likely to be the difference between causing harm to views from the Chilterns AONB and not doing so.
- 6.61 It is officers' view that the development is clearly significantly harmful to views at all distances and fails this criterion of Policy RC13.

Enhancing Reading's skyline, through a distinctive profile and careful attention to the upper and middle sections of the building.

- 6.62 The section of the DAS entitled, 'Silhouette' and the 'Capital' is actually a discussion on the relative merits of roof shapes. This section, of itself, provides a reasonable summation of the reasoning for the three roof styles, which is essentially to provide each of the three towers with a slightly different appearance. To this end, the design is successful in that three separate characters are produced.
- 6.63 The middle sections of these tall buildings, however, are actually fairly monotonous structures and this monotony is unfortunately only accentuated with their height. The windows are generally small and square and continue in a rather regimented form up the towers, reinforcing the monotony. The DAS describes these windows as a 'hole-in-the-wall' configuration, but this appears to be the result of a fairly standard building technique being employed with small windows to provide energy efficiency. The DAS indicates that a slightly darker colour tile would be used at the lower levels to attempt to produce the illusion of a tapering to the towers. Whether this would work in terms of producing a slimmer profile to the towers is not clear, but as can be seen from the CGI view from Vastern Road (the image at page 33 of the DAS, reproduced at the end of this report), this effect is far from convincing and this appears to be a clumsy attempt to break up the repetitive expanse of square windows which continue up the shafts of the towers.
- 6.63 It is not therefore accepted that the design in terms height/mass/bulk/scale is successful in paying close enough attention to these aspects and producing an exceptional quality of design which would enhance the Reading skyline.

Provision of space between tall buildings, so tall buildings can be read individually.

- 6.64 The proposal includes spaces between the three towers and these a minimum of 15.5 metres from the balconies at the sides of the towers. This is not a great distance, particularly given that the width of the towers (from the north or south) is almost 20 metres. Therefore, from many westerly and easterly locations, these gaps will not be discernible and the development will be read as a single mass (an option the DAS was specifically trying to avoid). Note should particularly be made of the view from the other side of the roundabout, looking from the west on Vastern Road. From here, despite CABE's concern for the lateral look of the proposal from the west, the proposal would effectively fill in the available sky over the road, as the towers are seen at a slight angle and the gaps between them will not be apparent. Views from many locations from the north-west are going to be poor (no gaps viewable from Caversham Bridge or Caversham Court). Also, worryingly, the view from Kings Meadow Baths allows no view between the towers. This issue also holds for views from the east and it reinforces the reasoning for the Illustrative proposals in the RSAF, which shows one tall building and one lower building, not three tall buildings. Part of the issue stems from a lack of setting: the site is surrounded by the railway embankment, roads, office buildings, etc. and this development would rely purely on the openness of the roads in providing a setting. As can be seen from this view and from Napier Road, this reliance fails from these lateral (east and west) views.
- 6.65 Reading is not a town of tall buildings where such mass and height can be easily assimilated. This is the most harmful of the shorter range views and from the Vastern Road view, the development would appear particularly foreboding, with the buildings appearing as, perhaps, a line of marching robots. It is difficult to see how this can be perceived as anything other than extremely harmful to a clear view within Reading, which is a clear vista to pedestrians and drivers along Vastern Road. This is wholly due to the application proposing three tall buildings on site, when in your officers' view (and as set out in planning policy) the site is only capable of accommodating one. This is a simple overdevelopment of the site and the building massing has managed to create an issue within the site itself (when the policy criterion is probably more likely to be used to control spaces between separate sites). This is clearly contrary to this criterion of Policy RC13.

Responding to context (urban grain, streetscape, built form, local styles).

- 6.66 Policy RC13 requires excellent design and architectural quality for tall building proposals. The CABE/EH Guidance on tall buildings, although almost eight years old now, contains criteria and guidance which are just as pertinent now. The guide places emphasis not just on the architectural quality but also on the credibility of the design (both technically and financially). There is no discussion of this in the DAS.
- 6.67 CABE appears to offer their support to the proposal, but with the caveat that the architectural quality needs to be 'outstanding'. The NPPF (paragraph 60) advises that, "*Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.*"

- 6.68 It is the overall scale of the structure and how the form fails to respond to its context which is of concern to officers. The DAS provides little or no justification for the architecture, design or massing and does not fully consider the character of the immediate built environment. It dismisses the immediate context (and much of Reading's core) as large scale 'big box' buildings without showing any appreciation for variation in urban form, streetscape or incremental increases in height, and uses this approach as justification for needing to distinguish itself from the (wrongly interpreted and under analysed) local townscape by means of advocating (without further explanation) excess height and mass. Assumptions in the DAS come in the form of succinct bullet points with conclusive statements such as 'Not a landmark building' and 'No contribution to architectural context of skyline'. The analysis stops at that and there is no demonstration of how these heights provide 'a landmark building' or a 'positive contribution to the architectural context of the skyline'. The DAS ignores the interrelationship between the three clusters in the RCAAP (derived from the Tall Buildings Strategy) and indeed the sub-grouping within the clusters themselves.
- 6.69 Policy CS7 is the Core Strategy design policy and requires that all development must be of high design quality that maintains and enhances the character and appearance of the area in which it is located. The components of urban form are identified as layout, landscape, density and mix, scale and architectural detail. The policy then advises that all of these aspects will be assessed to ensure that the development makes a *positive contribution* to the urban design objectives of:
- Character - a place with its own identity and sense of place
 - Continuity and enclosure
 - Quality of the public realm
 - Ease of movement and permeability
 - Legibility - clear image and easy to understand
 - Adaptability
 - Diversity
- 6.70 These good practice pointers to good design, or anything approaching them, have not been examined in the applicant's DAS and it is apparent that the surrounding environment and local (and policy) context has had little or no input informing the proposal. In terms of surrounding context, the DAS at various points makes reference to adjacent 'big box' buildings. This is an oversimplification, but it is accepted that the majority of buildings in the vicinity are large and range from two storeys to about 11 storeys. The DAS then argues that given this context, an 11 storey building cannot be construed as a 'tall building'. However, the conclusions reached do not give any indication as to, in their view, why a 15 storey building is somehow inappropriate and yet a series of towers of up to 28 storeys is appropriate. Pages 16 and 17 of the DAS comprises a section entitled, 'Relative heights of towers'. This seems preoccupied with the 'kinetic views' created by the towers at varying locations, rather than any specific discussion of the reasoning for the heights themselves or their relevance to the application site. It should also be borne in mind that Policy RC13 is very clear about what constitutes a 'tall building' in Reading, as its first words are, "*In Reading, tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall [AGL])*".

- 6.71 The immediate environs are a generally a mix of structures and commercial buildings, with residential slightly further away. To the west is the short north-south section of Vastern Road which continues under the railway bridge and the roundabout which links that road with Vastern Road, George Street and Kings Meadow Road. The site lies at the junction of Vastern Road, George Street and Kings Meadow Road.
- 6.72 To the north is Reading Bridge House (11 storeys from Kings Meadow Road level). This is a long 1960s office building, in buff brick and concrete with greenish spandrel panels between windows, which has been refurbished, with its main entrance accessed from a bridge link to Reading Bridge. To its east Kings Meadow House (occupied by the Environment Agency) is a brick-built 1980s/1990s five storey block in orange/pinky brick with slightly reflective arched windows. Beyond these buildings, on the banks of the Thames, is a brick-built residential development called Kingfisher Court, in mottled buff/orange/red brick, imitation slate roofs (mostly three storeys) which appears to be 1980s vintage. It occupies quite a secluded location in this part of Kings Meadow Road, which is a cul-de-sac.
- 6.73 To the north-east of the site is a residential dwelling, known as 'The Lodge', 22 Kings Meadow Road, which is a pretty detached property in brick and stone with mock Tudor gable, circa.1900. This is a Council-owned property, occupied as a 'tied' property by a former park keeper. Further to the north-east is King's Meadow, one of the town's linear parks. The eastern end of the Meadow is open playing field surrounded by trees, except for a small linear car park. The Meadow contains the Kings Meadow Baths (Listed Grade II, built 1902), in disrepair, but soon to be refurbished into a spa. At the eastern end of Napier Road lies Luscinia View (the six residential development with the curved blue roofs) in pale blue and white render and buff brick, of varying heights, the maximum being 10 residential storeys.
- 6.74 To the east of the site is a two storey office development in a series of three blocks, known as Napier Court. This is a low-rise (two storey) buff-brick development with traditional pitched roofs on a linear site with tinted windows and appears to be circa. early 1990s. It has the look of a low-density 'business park' type development. To the south, the application site abuts the main line railway embankment and beyond that is the One Reading Central development (11 storeys). Its sister building on Forbury Road is currently under construction. The corner building, One Reading Central, is a large, though attractive recent contemporary office building, with green glass, tiles and a coloured glass design on the northern stair core. The railway bridge next to it is wide - recently widened further in the station upgrade - and a functional structure constructed of sectional cast iron. Beyond this, to the south-west, is Apex Plaza, the late 1980s/early 1990s office complex in pink-coloured cladding, a maximum of eight storeys. To the west on the opposite side of the roundabout is the First Great Western multi-storey car park. This is a 1980s building in concrete with buff brick, arches and red brick stair cores and a pronounced concrete car circulation ramp full height at its northeastern side, near the railway bridge/embankment.
- 6.75 To the north-west of the application site next to Reading Bridge lies Clearwater Court (the Thames Water offices) which is approximately five storeys. This is a round building with a central courtyard opening up to the Thames, in reconstituted stone and quite traditional windows with intricate balcony-type bars and a curving slate-effect roof. The overall effect is a

Scottish-style 'Mackintosh' -inspired building. To the west of Clearwater Court lies 2 Norman Place, a large four storey office building in buff/light brown brick, stone lintels and a traditional slate-effect gabled and pitched roof.

- 6.76 To summarise the character of the immediate area, it is mostly comprised of fairly low-key commercial buildings, with a pocket of residential, which is clearly a more sensitive character, given these buildings' scale and occupancy.
- 6.77 Due to its sheer scale, the development would dominate all surrounding buildings, particularly Napier Court and The Lodge. In terms of height, buildings vary from two storeys to a maximum of 11 storeys but about 5-6 storeys is the prevailing height of the 'urban grain'. Some of these developments utilise their sites intensively, so that sometimes, even a five storey building is perceived as a dense development. Reading Bridge House at 11 storeys is clearly a 'tall building' in this area and arguably not reflective of the prevailing scale of buildings, either in terms of overall height or massing and other developments such as 2 Norman Place, take opportunities to break up their bulk. One Reading Central at Forbury Place is a 'tall building', but is more appropriate in its context. The buildings have different characters, some of them employing some quite traditional design effects and in general, these techniques are used to disguise their bulk and massing, rather than accentuate it. The buildings towards the Thames generally have some deference to the river environs (through their design and restrained scale); the exception being Reading Bridge House.
- 6.78 Most of these developments have suitable open spaces within them and at their edges, such as planted car parks, as the present development on the application site has. The application proposal does not do this and spans the majority of the site with a large podium and then relies (unacceptably) on the landscaped area to the front to provide a suitable public realm.
- 6.79 From the analysis of the local urban grain and general building from above, in terms of the seven urban design objectives set out in Policy CS7, officers advise that the development fails four of these and they are:
- Character: the design does not build on the local character and distinctiveness of Reading, rather, it ignores it and produces building forms which are out of context due to their scale
 - Continuity and enclosure: the Police Crime Prevention Design Advisor has raised security issues with the design, see below
 - Quality of the public realm: the RSAF suggests much more open space in the illustrative proposals section and the application has ignored this. The design relies on public realm either outside of the site or in an area where the public realm delivery is not guaranteed, due to the MRT/services, etc. Other developments in the locality are not generally as intensively developed and include suitable public realm within their boundaries
 - Legibility - clear image and easy to understand: the irrelevance of the intensity of the development as evidenced by its height, bulk, massing and three tower forms would lead to an alien and confusing structure, out of context with this part of the town centre. This will not maintain and enhance the character and appearance of this area of Reading.

- 6.80 The NPPF at paragraph 64 is clear in advising 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. This application, in a number of aspects, has failed to do this and this examination using the Council's principal design policy (CS7) has identified where. Accordingly this aspect of Policy RC13 is not complied with and this is an inappropriate form of development. The design approach is not appropriate and has resulted in reason for refusal 3.

Use of high quality materials and finishes.

- 6.81 In terms of external materials, the building is proposed to be constructed as follows:

- Pedestal/podium: brick, with entrance feature on west elevation in cast stone
- Shafts of the towers: a ceramic tile finish
- Roofs to the towers: copper, glass, cast stone

- 6.82 There are other design embellishments employed in the development: rustications, finials, scrolls, capitals, cornices, etc. All of these are elements of a potentially high quality style of architectural detailing, but this is not synonymous with a well-designed and appropriately-designed architecture which is appropriate to its context and no convincing argument is presented that the building will enhance the area's immediate character and its wider setting.

Providing a human scale streetscape, with rich architecture which reflects local surroundings through the definition of any upper storey setback.

- 6.83 The DAS (page 9) relies on paragraph 6.4 of the Tall Building Strategy, which generally advocates the principle of a podium and slender towers atop for tall buildings. However, this approach is not a panacea for all tall buildings and it is not appropriate in the manner applied in this application, which is overly-intensively employed. A smaller-scale (and much more appropriate) application of the above policy requirement would be, for instance, a 15 storey building, with a 'shoulder' at 10 storeys. Such techniques are used in a number of developments in Reading, such as Station Hill 3, where the lower element (up to the shoulder height) relates to the street and then a slightly taller element is set back, so as not to overbear the streetscape. However, the applicant has used the podium idea as an argument to produce a overly-large 'groundscraper' podium with three separate 'skyscrapers' rising out of it. This is a comparatively narrow and constrained site. The consequence of the large podium and the sheer height and bulk of the towers would be to unacceptably overbear and therefore dominate the immediately surrounding streets/locality and Kings Meadow.
- 6.84 It should be noted that the podium element of the design has improved since the designs which were shown to officers at the two pre-application scoping meetings. Those original designs presented fairly featureless multi-storey parking levels to the street, which was clearly a very poor design. This has now been replaced by active street frontages consisting (possibly) of retail uses, with shopfronts and entrances although they might involve less active uses such as B1 offices of D2 uses. Subject to the retail

sequential test being met, such uses to animate street frontages would be welcomed. The main entrance to the building on the west side of the development also provides a bold entrance to the street, however, there are issues with this location in terms of in access rights, transport, public realm and disabled access terms and this is discussed elsewhere in this report.

- 6.85 The overall effect of the building is still oppressive, despite the efforts to cut into the podium and introduce shops and active frontages to the street. This is because the podium itself is a large, generally unrelieved structure sitting in the street, without sufficient effort being employed to hide its bulk. This is largely due to the amount of servicing (mostly parking) which the podium has to contain. The effect of this is that the podium produces a monolithic groundscraper.
- 6.86 Overall, at immediate street level, the feeling will be of a massive overdevelopment, and a domineering presence in the streets. The proposal is far too tall, too bulky and the height and proportions of the podium level and towers would overwhelm the street. A human scale street would not be supplied and the application fails this aspect of RC13.

Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm and production of high quality public realm.

- 6.87 The site has a number of on-site environmental considerations to address in order to ensure its suitability for a predominantly residential development. The development itself also raises issues in terms of the quality of the living environment for residents and its environmental effects beyond the site.

External formal public realm

- 6.88 The development is very large and notwithstanding officers' concerns for the design of the development itself, there is a need for a detailed and deliverable landscaping scheme to help to mitigate the impact of the proposal. The site at present contains a number of trees and all are to be removed.
- 6.89 A landscape and external realm design report has been submitted, but this is little more than a series of sketches. The amenity spaces indicated consist of communal roof gardens on top of the podium levels, and terrace gardens on the top of the towers to serve the penthouses. The usability of the podium-level gardens is discussed in the wind/microclimate section below. External planted amenity landscaped areas are shown on the Vastern Road and Kings Meadow Road frontages and it is important that in this area of the Borough where there is less than 10% canopy coverage, all developments address this shortfall via additional tree canopy provision.
- 6.90 Essentially, the concern officers have with the external formal landscaped areas is related to the MRT safeguarding route (see Strategic Transport section above). The 'landscape proposals site strategy' plan (reproduced at the end of this report) shows green beds and trees in planters in the area of the MRT route on the northern and western sides. However, not only is this solution poor - as trees in planters will mean limited overall height and contribution to the streetscene of the trees - it is also not clear that this

can be achieved, given the MRT requirements. These are necessary areas of greening and public realm improvements which are required for this major redevelopment proposal and the applicant is promising this improvement with no certainty that it can be delivered. In response to CABE's comments, the main entrance has been moved to the Vastern Road frontage, however, it this discharges directly out onto land not under the applicant's ownership or control and is part of the safeguarding route. Aspirational, sacrificial or unachievable public realm is not acceptable for this major tall building redevelopment proposal and the applicant has failed to understand the importance of providing a high quality public realm within the site.

- 6.91 It would not be acceptable to provide this development with a compromised landscaping strategy and again, this is a situation where pre-application discussions could have been entered into, to understand the MRT requirements and work around the utilities infrastructure, which the applicant has presented in his utilities statement. The application is therefore considered to be contrary to policies for providing improvements to public realm and greening/landscaping of the urban environment: RC1, RC14, RC13, CS7, CS38, DM18, the Tree Strategy and NPPF paragraph 58, which requires attractive developments with appropriate landscaping. This forms a further reason for refusal.

External roof gardens

- 6.92 Policy RC9 (Living in the Centre), criterion 2, is concerned with the specific issue of where residential development is proposed in central areas, which by their nature can present potentially harsh living environments in terms of noise and air quality. The policy requires that mitigation is presented in proposals, where necessary. Furthermore, it states that residential development should not be located next to existing town centre uses where the noise levels would give rise to unacceptable levels of disturbance. Whilst the site is allocated for an option for residential use, this policy requirement nevertheless needs to be satisfied.
- 6.93 The application site is heavily constrained in noise and air quality terms, being sited next to a major railway line on its south side, the IDR on its west side and Kings Meadow Road/Napier Road on its North Side. The development is also likely to experience vibration from passing trains. The development needs to demonstrate suitability in terms of providing a safe and pleasant environment for the occupiers.
- 6.94 The Council's Environmental Protection Team advises that in terms of maintaining an acceptable internal noise and air quality environment, the applicant's supporting studies are suitable and these matters can be controlled via conditions. However, related to the issue above regarding the podium-level roof gardens, there are environmental health-related concerns. These gardens are enclosed to the rear and their sides are enclosed by the tall towers.
- 6.95 In relation to air quality, the pollutant levels are predicted to be unacceptably high for nitrogen dioxide and PM10s (particulates). In relation to noise, the predicted noise levels are above the recommended levels for noise within external amenity space towards the southern side where screening from the railway is lowest. The levels provided are described as 'free-field', so levels within the gardens which are likely to be affected by

sound reflected from the surrounding walls of the towers are in fact likely to be higher still. There are no proposals within the application to mitigate against such noise.

- 6.96 The Environmental Protection Officer concludes her advice by stating, *"It is my opinion that the location of the roof gardens within the development are not satisfactory due to the proximity and orientation in relation to the adjacent major railway line and station"*.
- 6.97 These are concerning observations and call into question the principle and suitability of having communal gardens in close proximity to the railway, hemmed in on three sides. To a related degree, the balconies on the south side of the building, especially at lower levels, are similarly likely to suffer from poor air quality and noise pollution. These environmental concerns shall be incorporated into the reason for refusal in relation to wind/microclimate.

Preserve/enhance settings/views in relation Heritage Assets.

- 6.98 Officers have considered the effects on all Heritage Assets which may be adversely affected by the application. The response received from English Heritage is cautious, but suggest many Assets could potentially be affected. There is also a concern that the full range of impacts on the heritage assets have not been correctly dealt with.
- 6.99 There are many listed buildings whose settings could potentially be affected, but most are too distant from the application site. The nearest Listed Building is the Kings Meadow Baths (Grade II) and given the angle that the development will be viewed from, a 'wall of development' will be presented to the Baths, creating some significant overshadowing very near to it. However, given that the development is some 100 metres away, the development will not overshadow the baths and the general setting within Kings Meadow will remain (albeit it will be altered by the presence of the development), overall, officers are satisfied that the harm to the setting of the Baths which may occur is low and not sufficient to cause significant harm within the terms of Policy CS33 and the NPPF's guidance on such effects on Heritage Assets.
- 6.100 Given its height, however, the presence of the building will be noticeable and in your officers' opinion, significantly harmful to other Heritage Assets. The towers will loom over top of buildings including the Grade I St Laurence's Church in the Market Place/Town Square Conservation Area. Whilst it will be remembered that both Station Hill proposals were viewable from this viewpoint, as with other previous approvals such as the Thames Tower, these proposals are in the 'right place', moreover their design is more subtle. It is therefore considered that views within and out of the Conservation Area are significantly adversely affected.
- 6.101 At closer quarters, the sheer height and scale of the towers will be evident from Forbury Gardens, particularly from the mound at the eastern end of the Gardens and also the Abbey Ruins. Given the height and overbearing presence of the proposal, officers consider the application to be significantly harmful to the settings of these Assets to result in inclusion within reason for refusal 4.

6.102 Furthermore, the submitted supporting information fails to properly identify harm to (views from) a number of Listed Buildings, which may significantly adversely affect their settings. In terms of identifying the true impact on Heritage Assets, the views shown appear more 'indicative' -despite stated as 'verified' views, because in some instances they seem to have been chosen on purpose, apparently, in the least conspicuous, or obscure places behind bulky buildings, or insignificant viewpoints which may 'hide' the true impact of overly dominant scale, massing and bulk. Thus, the study seems at best, incomplete; and potentially, misleading. Assets of concern are the following areas and buildings of historic and architectural (archaeological) significance, including: Reading General Railway Station (Grade II); the Listed Buildings and heritage assets of Market Place/ London Street Conservation Area; Reading Gaol (II), Reading Abbey and Abbey Gate (Grade I); St.James R.C. School (II); Assize Court; Forbury Gardens (HP&G, Grade II), and the Listed Buildings and heritage assets in its environs, The Town Hall [Council Chambers - II*] and Listed Buildings in its environs; Queen Victoria Street Listed Buildings and historic area; Friar Street's Listed Buildings; Broad Street including Listed Buildings and its historic churches-Church of St. Lawrence (Grade I);'s; St. Mary's Butts; St. Giles; and including historic 'industrial' Listed Buildings such as the Corn Stores (Grade II) not far away from the application site, although this list is not exhaustive.

6.103 The effect on the Conservation Area, Forbury Gardens and Abbey Ruins is clear and considered to be sufficiently adversely affecting settings/views to warrant including in the reason for refusal. Failure to fully demonstrate harm to other assets is also not acceptable. The comprehensive reason for refusal (2) in the Recommendation sets out the various impacts and the policies relevant. For the reasons above, the proposal is not in accordance with policies RC1, RC13, CS7 or CS33 in that it is not suitable in terms of height.

Mitigation of wind speed/turbulence.

6.104 The application has been supplied with a wind/microclimate study to support the submitted design. However, this document has been thoroughly reviewed by the Building Research Establishment (BRE) on behalf of the Council and the BRE's advice is that the study is 'not credible'.

6.105 The BRE has identified a number of shortcomings with the applicant's wind report. The report is based upon the findings of a 'computational fluid dynamics' (CFD) study, as opposed to have been based on wind tunnel testing a scale model of the development.

6.106 The BRE identifies concerns with the majority of the assumptions made with the applicant's CFD study including its very broad generalisations about wind speeds and even the location of the site and their advice is that this proposal should have been modelled and assessed via a wind tunnel. The BRE advise that the report is not suitable for its purpose as its conclusions are neither robust nor reasonable and does not demonstrate the suitability of the development in wind/microclimate terms.

6.107 The applicant's DAS (page 11, 'Refinement of Building Form') indicates that wind testing indicated that a tapered form of towers with rounded edges would reduce wind turbulence between the towers and that inset balconies

were preferable. The BRE advises that the two roof gardens on the podium levels are unlikely to be usable for their intended purpose, given the strong downdraughts which would occur due to the proximity of the very tall towers and their advice is had a wind tunnel test been conducted, it would have been highlighted this concern and the design would have been adjusted, possibly to the extent of removing these areas altogether. CABE also raised concerns for the usability of these gardens. There are roof gardens shown at the top of the towers, but for obvious reasons, these are likely to be quite windy areas and probably only suitable for use for relatively short periods. Nevertheless, they would be a useful amenity for the occupants of the penthouses.

- 6.108 The applicant has been invited to address the issue and re-submit a further wind study, but has declined. Accordingly, the wind study is not acceptable and has failed to demonstrate that the wind conditions in and around the site would lead to a comfortable environment for the intended purpose of each space and this results in conflict with policies CS7, RC5, RC9, CS13, CS34, DM4 and DM10, and paragraphs 56 and 59 of the NPPF, which seek to achieve good quality public spaces which are inviting. This is a further reason for refusal of the application.

Suitable levels of daylighting and sunlighting are able to reach buildings and spaces within the development;

- 6.109 Although the policy criterion is only concerned with the development itself, other policies (for instance SDPS Policy DM4: Safeguarding Amenity) are concerned for effects beyond the site and this will be covered in this section.
- 6.110 The BRE has also been instructed to examine the applicant's light analysis report and there are also concerns with this technical study. The applicant's 'daylight analysis' covers daylight provision in two example apartments in the proposed development. The apartments analysed are described as being the worst case representation, being overshadowed by the neighbouring towers. However, the living rooms would primarily face outwards and be unobstructed. However, there are other living rooms which are anticipated to experience more obstruction and were not included in the analysis.
- 6.111 The conclusion in the report that all habitable spaces within the development are expected to have adequate levels of natural daylight is not currently supported by the BRE. There is also concern about whether the daylight calculations give a true average of the light within each room.
- 6.112 The flats are oriented to give the majority of main living rooms access to sunlight. The available floors show that five of the six living rooms on each residential level of each tower would face approximately south, east or west. The living room which faces solely north would have a view of King's Meadow. Calculations of 'annual probable sunlight hours' for individual windows have not been carried out. Some living room windows would be obstructed by the other towers and the rooms could therefore receive reduced amounts of sunlight, despite having an orientation where they might have a reasonable expectation of sunlight.

- 6.113 The impact of the development on the daylight and sunlight received by other buildings in the vicinity is not addressed by the report. This is a substantial omission. There is a Council-owned park lodge on Kings Meadow Road, opposite the application site. This dwelling is likely to be significantly affected by the development. Kingfisher Place (nearer the Thames) also has the potential to be significantly affected.
- 6.114 The applicant has been informed that there are concerns with this study, but has declined not to address them. Accordingly, the analysis is incomplete in omitting important information in relation to light levels to the flats themselves and not producing information to confirm that light levels to the surrounding residential dwellings would be suitable. A reason for refusal is recommended for a failure to demonstrate suitability on these matters and the application is therefore contrary to policies RC1, RC5, RC13 and DM4.

(iv) Residential layout assessment

Housing mix

- 6.115 A number of objectors express concerns with the type of accommodation being presented and question the need for such accommodation in the town. One concern is for the likely occupiers or whether the flats would be owner-occupied or private rented, but these are not material planning considerations.
- 6.116 However, there are indications of the type of occupancy that the accommodation is targeting. The two-bedroom flat layouts often show bedrooms accessed off living areas and this arrangement is unlikely to suit family living and more likely to be attractive to co-sharing mortgage-holders or those private renting. Some objectors raise concerns for the social problems inherent in tall buildings but these are often management or maintenance issues.
- 6.117 RCAAP policy RC9 seeks a mix of units in major developments and as a guide, in developments of 15 or more units, a maximum of 40% of the units should be one-bed and a minimum of 5% should be at least three-bed, unless there is clear demonstration that this would adversely affect the viability of the development. Whilst the development includes a good proportion of two-bedroom flats (234, or 66.4% of the total) this has been at the expense of the provision of three-bed (or more) flats, as the development proposes just one (the 5% requirement is 18). In these calculations, the penthouse areas are all effectively two-bedroom flats, and although these are very spacious and could potentially become three bedroom units, this would still fall short of the policy requirement. No justification for this has been provided and for the failure to provide a mix of housing units in the development, the proposal is contrary to Policy RC9 and this should form a reason for refusal.

Housing configuration

- 6.118 Policy RC13 (Tall Buildings) states that tall building proposals should, "*Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light*

glare and night-time lighting.”. The development causes no privacy issues to existing residential and the other matters here are covered elsewhere in this report.

- 6.119 Generally, the internal layout of the residential units is acceptable. The flats on the east and west sides of the building include bedrooms which are accessed off the main living/kitchen area and the Council’s EHO objects to this. This arrangement will only meet the Building Regulations if fire-sensing (sprinkler-type) systems (or similar) are used, but this is not a planning matter. Overlooking distances between the towers are a minimum of 15.5 metres, which is not generous and there will be a number of fairly direct overlooking opportunities. But on balance and given that the site is within the Major Opportunity Area, this is satisfactory. The flats all have balconies, which appear as ‘bulges’ in the middle of each side of the towers, each bulge being half of a balcony for a flat.

Security

- 6.120 The Police’s Crime Prevention Design Advisor (CPDA) has produced a long list of concerns with the application, some of which are the lack of commitment to security measures and others stem from insufficient thought having been given to the layout of the development, which would create security issues. This is clearly an area of the application where pre-application contact with officers and/or the CPDA would have been beneficial. Whilst there are a number of concerns raised, none (or more, cumulatively) is considered to be sufficiently harmful to warrant a reason for refusal of the application. However, in order to make this proposal suitable in security terms, a complex security strategy would be required in order to reduce these concerns. This could be covered by condition, were the application otherwise suitable, to be compliant with Policy CS7.
- 6.121 In accordance with validation requirements, the developer has investigated options for superfast broadband and confirmed a supplier.

(v) Other transport matters

Parking levels and sustainable travel

- 6.122 It is accepted by the Highway Authority that the present use as a car showroom produces a large amount of trips on the transport network and these would be very similar to those produced by the proposed development. Therefore concerns from objectors on traffic generation grounds cannot be substantiated.
- 6.123 Some objectors are concerned that the lack of on-site parking will lead to parking issues in the area. In general, this is a very sustainable location, a short walk from the station’s northern or southern entrance. The Highway Authority is satisfied that the parking level offered is suitable for the site. Residents would not be permitted to have parking permits and the applicant is offering a four-car car club as a further incentive to sustainable travel. Cycle parking is included at a suitable level and access from the cycle parking areas to the road/cycle network is direct. In these respects, the application complies with policies CS23 (Sustainable Travel and Travel

Plans) and CS24 (Car/Cycle Parking) and could be adequately controlled by conditions and/or obligations, as necessary.

HGV servicing

- 6.124 Car parking is located at the lower levels of the development and this is suitable (although the amount of parking and the scale of the podium required cause design concerns and this covered elsewhere in this report). Underground parking is unlikely to be achievable due to flooding and services under the site. The parking arrangement therefore complies with the requirement in Policy RC13 for parking to be 'within the development'.
- 6.125 The submitted site plan indicates car access to the site taking place from the site's eastern extremity, via the access road to the Napier Court offices, which is not public highway. The applicant has presumably established that they have rights to use this private access, as no access rights would be conferred were this proposal to receive planning permission.
- 6.126 The servicing access is proposed directly off Kings Meadow Road but the plans do not show the ability to turn a service vehicle within the site. This would lead to a number of unacceptable options:
- the vehicle entering the service area and then reversing out in the carriageway
 - the vehicle stopping in the carriageway and then reversing into the site; or
 - the vehicle waiting in the lay-by that the site plan is showing.
- 6.127 The first two arrangements are unacceptable, as they will introduce a highway hazard and put all road users in danger, or at the least, cause congestion. The third arrangement is also not acceptable as the area for the waiting vehicle is part of the area where the MRT lane would be. Therefore, the development would in this case have to rely on parking the vehicle on the carriageway or obstructing the MRT route, neither of which would be suitable.
- 6.128 This concern is therefore related to the reason for refusal above regarding the safeguarding of the MRT route and the development needs to adjust and respond to the infrastructure requirements, which in this case are a requirement for on-site turning. At the time of writing, the applicant is exploring alternative designs to alleviate this issue and any progress on this issue will be discussed in the Update Report. Unless and until this matter is resolved, the application is contrary to Policy DM12, and the other transport policies in relation to provision of the MRT, as set out in the Recommendation.

(vi) Flooding

- 6.129 The RC1h site in the RCAAP requires that an acceptable dry access scheme must be part of any development on this site. The site was also included in the Council's Strategic Flood Risk Assessment (SFRA) document.
- 6.130 The Environment Agency advises that there are no concerns with the submitted Flood Risk Assessment, so it is taken that the development is acceptable in terms of technical flood risk. However, in determining this

application, the Council must ensure that the sequential test is satisfied. This is now set out in Flooding Planning Practice Guidance note which accompanies the NPPF.

- 6.131 Government advice in the NPPF is that development should generally be steered away from areas which are at risk of flooding. Core Strategy Policy CS35 does not permit developments within areas at high risk of flooding, where flood storage capacity would be reduced, or there would be increased risk to life or property.
- 6.132 The site lies within Flood Zone 2, near the Thames. The application has been submitted a Flood Risk Assessment and this identifies that the site is at a potential risk from fluvial flooding but not part of the 'functional floodplain'. There is also a culvert within the site, but there is no record of flooding from this watercourse. In terms of flood flow, there is limited additional site coverage as a result of the development (when compared with the existing situation) within Zone 2.
- 6.133 The NPPG on Flooding has been assessed. This is a major development and the additional risk involved is due to the nature and the number of occupants (likely to be in the region of 700 residents). The proposed ground floor commercial uses are 'less vulnerable' uses in terms of the NPPG and such are suitable in Zones 1, 2 and 3a. Residential is a 'more vulnerable' use and is suitable in Zones 1 and 2 and must pass the exceptions test to be acceptable in Zone 3a.
- 6.134 The Environment Agency considers this to be a 'low risk' development proposal and has directed officers and the applicant to the EA's Flood Risk 'Standing Advice' (FRSA), which sets out emergency practices and procedures and an FRSA form is supplied within the FRA. It should also be noted that this underlying exposure to flood risk was accepted when identifying development sites in the Development Plan (the RCAAP and the Sites and Detailed Policies Document), which was informed by the Strategic Flood Risk Assessment.
- 6.135 With the confirmation of flood safe access and other usual good practice flooding controls set out in the SFRA, officers are satisfied that the development poses no additional flooding risks and is in conformity with the NPPF and Core Strategy Policy CS35.

(vii) The Community Infrastructure Levy (CIL), affordable housing and S.106

Community Infrastructure Levy (CIL)

- 6.136 The Council's CIL Charging Schedule came into force on 1 April 2015 and this is CIL-liable development. Therefore, in accordance with the Schedule, tariff-based payments would be due in relation to Integrated Transport (RUAP), Leisure and Education. The applicant has calculated the CIL liability as £2,432,400. The

applicant's CIL Liability Form has only recently been received and if there are any queries with the calculation, this will be explained in the Update Report.

Affordable housing

- 6.137 Affordable housing provision is outside the remit of CIL. Policy CS15 (Affordable Housing) as revised, sets a requirement that 30% of all housing within relevant major developments shall be affordable. This requirement is also supported by the Council's SPD, 'Affordable Housing'.
- 6.138 The application has been submitted with a viability assessment, but this has not been agreed by the Council's Valuer. At the time of writing, there is therefore no firm proposal for affordable housing in the application, so this has resulted in the reason for refusal in the Recommendation above. However, the applicant has indicated that he wishes to continue dialogue with officers on this matter between now and your meeting and there may be an update on progress on this matter in the Update Report.

Employment and Skills

- 6.139 In accordance with the adopted Employment and Skills SPD and policies CS13 and DM3, the developer is required to provide an Employment and Skills Plan (ESP) for the construction phase. The applicant states that an agreed outline for an ESP has been agreed and Reading UK CIC confirm this. Subject to confirming the developer's detailed commitment to the ESP, this is acceptable, providing this forms part of a signed S.106.

Car club

- 6.140 The applicant (within the Transport Assessment) has indicated a willingness to fund and run a car club with four cars, although this is not included in the S.106 letter. RBC Transport Strategy advises that this would be acceptable and officers advise that this would need to be covered in a S.106 obligation to achieve compliance with Policy CS23, as it is a site-specific transport requirement, outside the remit of CIL.

Environmental improvements in the vicinity of the site

- 6.141 The supporting documents mention the provision of environmental improvements in the vicinity of the site and the applicant's revised S.106 Heads of Terms offer letter (dated 9 April 2015) states the following:

"The applicant is investigating a number of concepts for improvements to the public realm adjacent to the site, including improvements to hard landscaping; soft landscaping; street furniture; signage; and lighting. Full discussions with the Council are invited to select and refine the most appropriate concept and in turn to agree an appropriate implementation mechanism within the Section 106 agreement. A capped public realm improvements sum of £150,000 is offered".

- 6.142 This area of Vastern Road has been subject to a comprehensive public realm refurbishment in 2014/5, as part of the Station upgrade works. This has included new paving and street trees and Transport Strategy confirms that no additional works to the highway are required. The letter does not confirm where the contribution would therefore be directed to. If it is the area to the immediate west of the application red line (owned by the

Council, partly highway land), additional trees and landscaping are unlikely to be suitable in this area due to the requirements of maintaining visibility splays for the roundabout and the location of underground services. Any public realm 'improvements' in this area may need to be minimal to comply with highway requirements. You are therefore advised that a meeting with officers is not appropriate. In short, it is the applicant's responsibility to submit applications in the correct format and to have fully considered the implications of the development mitigation at pre-application stage; not wait until the application is almost ready to be reported and demand that the Council designs requirements which are unnecessary.

- 6.143 In summary, mitigation of the development on the western side of the application site may not be possible within the land shown and again indicates an overdevelopment of the site.

Public art

- 6.144 The revised Planning Obligations SPD encourages public art to be supplied at 1% of total construction costs. The applicant offers that the building's architecture is of such quality (architecture and lighting) that they should be considered to be public art and there should be no separate requirement. Other major redevelopment proposals in the central area (Station Hill, Reading Central) have provided public art as part of their proposals. Officers are disappointed that no public art is being offered on this gateway site and in the absence of an offer, the application does not comply with policies CS9 and DM3.

Provision of managed public access to upper floors

- 6.145 The Planning Obligations SPD allows for contributions/obligations which are particular to the application under consideration. The requirement for public viewing is set out in Policy RC13 but also in the CABE/English Heritage guide for tall buildings and is accepted good practice and part of the development being assimilated into the town. This matter is not discussed in the application documents, or in the 9 April letter. If these were to be the tallest buildings in Reading, part of their contribution to the town would be the ability to offer residents of the town an opportunity of a viewing area. Both Station Hill approvals offer such arrangements. However, the 'capital' areas of the towers are private penthouses only and do not even contain a restaurant or bar, where people could pay to observe views. This is another example of the way that the development would be presented as 'separate' from the town centre and failing to contribute to the town. This is a provision which could have been included in the proposals, but the scheme as designed/offered is considered to be contrary to
- 6.146 The above contributions would be sought to provide the necessary infrastructure to meet the needs of the development. This would be secured via a Section 106 agreement as part of the application process in accordance with the S.106 Obligations SPD and the policies set out above in the Recommendation, subject to Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations, were the application to be approved. The contributions are necessary to make the development suitable, directly related to the development and fair and reasonable, given the additional pressure which would be put on existing facilities.

Other matters

Sustainable design and energy

- 6.147 The Council's adopted suite of sustainability policies is CS1, DM1 and DM2 and the Council's revised SPD on Sustainable Design and Construction. Policy CS1 requires that for major developments, the equivalent of 50% of the building should meet the relevant BREEAM Excellent level and 50% should meet Very Good and in practice, this usually means that as a minimum, major scheme should aim to achieve a mid-point BREEAM score between the two. Policy RC13 requires that tall buildings should be exemplary in all aspects of energy conservation and efficiency.
- 6.148 The applicant has produced studies which indicate that the Council's requirements can be met and the above levels achieved and provides the opportunity for the development to link in to a district energy scheme. However, the Council's Sustainability Team advises that the energy/sustainability strategy produced is not conclusive in a number of respects. The biggest factor for this development is the likelihood of the flats overheating. This is because many of the flats would be subject to high levels of solar gain and due to noise and pollution levels, windows are often unlikely to be opened. No shading proposals are included and no details of any air conditioning systems are provided (which are going to be energy intensive). Furthermore, tall buildings such as this are likely to suffer from overheating due to the amounts of hot water being pumped around the building.
- 6.149 Another energy consideration is the high-speed lifts, which will be in almost constant operation. Unfortunately, this aspect is not covered under the Code for Sustainable Homes, even though lifts alone could account for some 20% of the whole energy use of the development.
- 6.150 In summary, whilst the studies have been conducted satisfactorily, the development will pose significant and challenging design issues to achieve the stated sustainability levels. Whilst officers do not, on balance, recommend this as a reason for refusal, the applicant may experience difficulties in achieving a development which is acceptable in terms of energy use and is also comfortable for occupants.

Incorporation of building maintenance arrangements.

- 6.151 This is a design requirement of Policy CS13. The obvious place for this matter to be covered is in the DAS, but there is no discussion of this. Given the complicated nature of parts of the architecture and the lack of servicing areas on the roof, roof-mounted building maintenance units are unlikely. Maintenance of stone-type clad towers is likely to be minimal in any event and abseil access could be used when required. The applicant has been asked to clarify this matter.

External lighting

- 6.152 The applicant has prepared a detailed lighting strategy. Two of the stated purposes of this are to create a landmark building at night provide the opportunity for spectacle (using coloured and/or dynamic lighting). Whilst the Environmental Protection Team is content from the point of view of

light spillage to surrounding properties, such lighting effects would only serve to exacerbate the design concerns set out above and especially in drawing attention to the towers from long distances.

Ecology

- 6.153 There are no concerns from the Council's ecologist, subject to conditions for provision of biodiversity enhancements, to secure compliance with Policy CS36, including no clearance of any shrubs outside the bird nesting season. The objector's concern regarding owls is not a concern shared by the ecologist pertinent to this particular application.

Noise from the development and construction impacts

- 6.154 The development may have new roof plant and a noise report has been submitted with the application which indicates that the noise levels should be suitable. The Environmental Protection Team advises a condition to ensure that any plant submitted demonstrates that those levels are achieved, were permission to be issued.
- 6.155 The construction phase, including vehicle movements, should be controlled by a Construction Management Statement (CMS) and further controls on dust and noise suppression and limiting construction hours. Conditions could control these aspects of the development. In these respects, the development would comply with policies CS34, DM4 and DM12.

Contaminated land/land conditions

- 6.156 The site is likely to be contaminated, having for the last 25 years or so been in motor-related uses and previously, a railway good yard. An initial contamination report has been submitted and conditions are recommended by the Environmental Protection Team, to secure compliance with Policy CS34.
- 6.157 A utilities and drainage report has been submitted. This has not been assessed in detail on the basis of the depth of concerns with the planning application.

Equalities Act

- 6.158 In determining this application, the Committee is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. CONCLUSION

- 7.1 Policy CS7 requires developments to, *“Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm”*. Essentially, this one sentence encapsulates all that this proposal has not achieved in urban design terms. Moreover, the analysis of the proposal against the criteria against the tall buildings policy (RC13) - of which all criteria are to be satisfied - clearly indicates that the proposal causes significant harm to the majority of these design requirements.
- 7.2 The case for development in its totality has not been made. This application is not capable of officer support and officers identify the areas for possible refusal of permission as follows:
- The development has failed to acknowledge the protected line for the MRT route and the Council is currently preparing designs and costings for this route to come forward in the short-medium term. The servicing arrangement proposed would involve HGVs reversing into Kings Meadow Road, creating unnecessary traffic and pedestrian danger.
 - The above situation has meant that any landscaping shown will not be achievable
 - The design of the buildings is foreboding and alien to the town and even to this country. The contextual rationale for the design proposed is not demonstrated in the DAS, which is very poor.
 - The scale and massing of the buildings is vastly out of scale with the allocation RC1h in the adopted Development Plan, which envisages a single building, at a height which reflects its position at the eastern extremity of the Station Area (tall building) Cluster. The application’s scale will have an adverse effect on views within the Borough, sit poorly with the surrounding context of buildings, overbear its surroundings and compete with the central area for dominance of the town, to the extent that the centre of the town could be mistaken for being this site (from the railway). The impact that such a scale of development will have on heritage assets has been considerably downplayed in the supporting studies, to the extent that it is suggested that the development will in fact be beneficial. In fact, there will significant harm to settings of and views of heritage assets within the town.
 - The application has not demonstrated acceptability in terms of providing a suitable microclimate or acceptable light levels for proposed and neighbouring residential properties. These studies have been undertaken poorly.
 - At the time of writing, a suitable package of S.106 contributions has not been agreed with the applicant.
 - The ‘retail sequential test’ submitted is not acceptable.
- 7.3 The applicant has not sought to engage with officers in pre-application discussions on this proposal, which is good practice for any development, but particularly with a scheme of this size, impact and complexity. Some of the more technical concerns (for instance light and wind effects) may have been capable of being addressed and the reasons for refusal removed or lessened. However, the applicant does not agree to the application determination period being extended, therefore officers submit that the reasons for refusal in the Recommendation are a comprehensive coverage of the most significant shortcomings of this application.

- 7.4 Given the lack of engagement by the applicant during the applicant's consideration (save for matters of validation and administration), an appeal against any refusal of permission issued is anticipated, although for the reasons discussed above, officers are not clear why the applicant is not keen to reduce the number of issues which would be raised at any such appeal, as this could ultimately lead to a more prolonged appeal process.

Plans:

5788/02 Site Plan
5788/03 Demolition Plan
5788/04 Rev. A Ground Floor Plan
5788/05 First Floor Plan
4788/06 Second Floor Plan
5788/07 Third Floor Plan
5788/08 Typical Floor Plan
5788/09 Top Level Floor Plans
5788/10 Rev. A North Elevation
5788/11 South Elevation
5788/12 Rev. A East and West Elevations
5788/13 East Section-elevations
5788/14 West Section-elevations
5788/15 Longitudinal Section
5788/16 Animated North Elevation
5788/17 Animated West Elevation
(all plans received on 5 February 2015)

5788/18 Floor Below Penthouse (received 13 February 2015)

Case Officer: Richard Eatough

APPENDIX 1
CABE Design Review response 22 September 2014

APPENDIX 2
Other documents and images