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Our ref: 08/01104/OUT & 08/01104/LBC

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13<sup>th</sup> November 2008

Your contact is:

Justin Turvey - Planning South and West Team

**WITHOUT PREJUDICE**

Dear Sir,

**Application:** 08/01104/OUT & 08/01106/LBC

**Description:** Hybrid planning application for the redevelopment of the former Thames Water Reservoir site to include an Outline application for 101 residential units (access only) and a Full planning application for the conversion and extension of the Grade II Listed Water Tower for B1(a) office use; and Conversion of water tower to B1a office use and extension to rear and to roof

**Location:** Reservoir And Pumping Station, Bath Road, Reading, RG1 6PG

I write in connection with the above planning applications, which are currently with this Authority for consideration.

Having visited the site and considered the proposal, and received comments back from a number of the Council's internal and external consultees, I consider that there are the following significant issues associated with the development:

**Flood Risk:**

PPS 25 (Development and Flood Risk) requires that a Flood Risk Assessment (FRA) accompany applications for development on sites of 1ha or more within Flood Zone 1, so as to ensure that surface water runoff is effectively managed to reduce flood risk on and off the site. A FRA has not been submitted with the application, and accordingly the Environment Agency (EA) have objected to the development on flood risk grounds. In the absence of an acceptable FRA, the application does not demonstrate it would effectively manage surface water runoff, contrary to PPS25, 'Saved' Policy NE10 of the Reading Borough Local Plan 1998, and Policy CS35 of the Local Development Framework Core Strategy 2008.

I note the EA have now removed their objection on the basis of contamination, following the receipt of further information. I am not in receipt of this information, and would be grateful if you could arrange for it to be forwarded to me.

### Ecology:

As you are aware from comments forwarded to you, the Council's Ecologist has requested that an Ecological Impact Assessment (EclA) be submitted. An updated phase 1 habitat survey would also be required. I note that the last survey was undertaken in 1998, and that this was not submitted with the application as supporting information.

Both English Nature and the Council's Ecologist have raised an objection to the development on the basis of lack of up to date survey work in relation to slow worms, breeding birds and stag beetles. It is apparent that there is the potential to support roosting bats at a number of locations within the site, including what appear to be the disused air raid shelters and the circular tank. No survey works appears to have been carried out anywhere other than at the water tower and pump house, and the work undertaken at the water tower does not appear to meet the minimum required. I am aware that updated survey work is being undertaken, and that a supplementary slow worm and ecological evaluation reports were submitted on 31<sup>st</sup> October, but this cannot all be fully assessed prior to committee on the 3<sup>rd</sup> December. As it stands, therefore, the application is contrary to PPS9, 'Saved' Policies NE6 and NE7 of the Local Plan 1998, and Policy CS36 of the Core Strategy 2008.

Notwithstanding that Landscaping is a reserved matter, landscaping principles should have been discussed prior to submission of the application. The principles would need to include details of species and further details relating to the planting within the woodland strip.

In relation to trees, I note that the application proposes the loss of at least one of the street trees along the Bath Road. However, comments from the Councils Transport (Development Control) Section confirm that at least one more, if not more, mature street trees would have to be lost to provide adequate visibility for vehicles leaving the site. The trees on this major route in the town are of considerable amenity value and their loss should be resisted.

### Open Space:

In relation to open space provision, the Council's Parks and Open Spaces Development Manager has raised concerns with the proposal as submitted. In particular, the use of what is termed the 'arrival square', which appears to be partly landscaped, and the size of the open space area to the rear is of concern; the supporting statement does not sufficiently justify either its size or location. It may be appropriate to provide an additional area of open space in place of units 42 - 45. This would have the benefit of providing an entrance feature for the site and removing the units at the front, which appear cramped in the context of the Listed water tower and pumping station. In its current form, the application does not demonstrate that it would provide adequate amenity provision in an acceptable location, contrary to 'Saved' Policies CS28, CS29 and CS30 of the Core Strategy 2008.

No details of the proposed management of the 'wildlife area' have been put forward for consideration, and this remains an area to be discussed.

### Transport:

Reading Borough Council's Geometric Design Guidance for Residential Accesses on to Classified Roads requires the access to be 5.5 metres in width and provided with a 10

metre radii at the junction with the main road. Although it has been stated in the Transport Assessment that the access will be in line with this requirement the proposed access drawings submitted show the access to be 4.8m in width and provided with a 6m radii, which is insufficient, resulting in conditions prejudicial to highway safety; contrary to 'Saved' Policies EMP3, HSG5, HSG9 and TRN11B of the Local Plan 1998.

The existing street trees along the Bath Road severely limit visibility to the west of the site. At present, vehicles could pull out into the bus lane to gain better visibility, but this has implications for the operation of the bus lane, and would not be the case were the bus lane to be moved. The scheme therefore does not provide adequate visibility splays for vehicles leaving the site, resulting in conditions prejudicial to highway safety; contrary to 'Saved' Policies EMP3, HSG5, HSG9 and TRN11B of the Local Plan 1998.

In order to prevent parking on junctions and conflicting traffic movements, the Council will not allow accesses within 20m of the main site access. The application proposes two accesses within 20m of the Bath Road access, which is unacceptable, and again would result in conditions prejudicial to highway safety; contrary to 'Saved' Policies EMP3, HSG5, HSG9 and TRN11B of the Local Plan 1998.

Transport have also raised issue with the TRICS data submitted for consideration. Whilst the comparison site selected is acceptable in terms of location, the mix of units chosen (mostly one and two bedroom flat units) is not comparable with this site, which would have a range of dwelling types. The submitted data does not fully reflect the likely number of vehicle movements that this development would be likely to generate, and the applications failure to demonstrate its acceptability is contrary to 'Saved' Policies EMP3, HSG5 and TRN11B of the Local Plan 1998.

Census figures for the area indicate that the likely level of car ownership for the development would be 1 parking space for the one and two bedroom units, and 2 parking spaces for the three and four bedroom units. This would equate to 146 spaces, rather than the 124 proposed. The lack of parking to serve the site would lead to overspill parking and conditions prejudicial to highway safety, contrary to 'Saved' Policies HSG5, HSG9 and TRN11B of the Local Plan 1998.

A number of other concerns have been raised; namely access to the site for refuse vehicles, turning areas for refuse vehicles should they be required, forecourt depth for some of the parking spaces for the office element, and the provision of cycle storage. No details of the proposed management of the Western Road parking area have been put forward for consideration, and this remains an area to be discussed.

#### Listed Building:

You will note that English Heritage have commented on the proposal, and have raised concerns in relation to the central blind lancet on the west elevation. Notwithstanding English Heritage's general comments on the proposal, officers are concerned that the proposed development would have a detrimental impact upon the setting of the listed building.

The three-storey extension to the listed water tower as proposed appears too close to the building, and detrimentally affects its setting. Whilst it is appreciated that a circulation/servicing area would be required for the building, the extension as proposed is excessive in scale and overly dominant in terms of its relationship to the listed building. It is also considered that Block C (units 80 - 91) appears too close to the listed building as

extended, detracting from its setting, contrary to PPG15, 'Saved' Policies CUD1, CUD2, CUD4, CUD14 of the Local Plan 1998, and Policies CS7 and CS33 of the Core Strategy 2008.

In terms of the visual appearance of the entrance and overall setting of the retained buildings to the frontage, units 42 - 45 appear to make the entrance to the site appear somewhat cramped, and detract from the setting of the retained buildings on the Bath Road frontage, contrary to PPG15, 'Saved' Policies CUD1, CUD2, CUD4, CUD14 of the Local Plan 1998, and Policies CS7 and CS33 of the Core Strategy 2008. It may be preferable to remove these units to provide an area of open space.

Although it has been removed from the details of the listing for the water tower, the boundary wall and railings at the front of this site are considered to be important townscape features, and their retention, where possible, will be sought. For information, you may also wish to know that there is a Grade II Listed milestone along the Bath Road frontage of the site.

#### Principle of Office Development:

Any office floorspace proposed on site (however small) will need to be subject to the tests in PPS6. Although it is a requirement that such an assessment be carried out, PPS6 states that the scope of information required in terms of those tests should relate to the size of the proposal. Nevertheless, PPS6 has not been fully referred to in the submissions, and the application therefore fails to demonstrate the acceptability of the site for office accommodation, contrary to PPS6 and Policy CS36 of the Core Strategy 2008.

#### Site Levels & Detailed Design:

Sections have been shown at three points across the site. However, there is not nearly enough detail submitted in relation to levels to enable a full assessment of the likely impact of the finished development platform in relation to the adjoining land. In particular, it is not clear what level the land will be along the eastern boundary, and there are inconsistencies in the submissions; for example, P.6 of the DAS appears to indicate that the development platform would be level with Western Road, whilst p.20 of the DAS appears to show it to be at least 1m higher. The application does not demonstrate that the finished level of the development platform would not result in an unacceptable impact upon surrounding occupiers, and is therefore contrary to PPS1, PPS3, 'Saved' Policies CUD14, HSG5, HSG9, and Policy CS7 of the Core Strategy 2008.

In addition to the point above relating to the impact of Block C on the listed building, I am also concerned regarding the separation distances to the adjoining development. The adjoining three-storey care home at No. 42 Bath Road has a number of habitable room windows facing towards the reservoir site. 3-storey flats are proposed for Block C, and the separation distance is only 17m, leading to the potential for overlooking and overshadowing. This also makes the small strip of amenity space proposed for the block unattractive to use. It is not clear how much higher than the adjoining site the development platform for Block C would be, and this is a cause for concern. The poor relationship between the buildings is contrary to 'Saved' Policies CUD14, HSG5, HSG9, and Policy CS7 of the Core Strategy 2008.

4-storey flats are proposed at units 53 - 63. Whilst the separation distance to the Western Road properties would be in the region of 24m, the height of the buildings facing Western Road at this point is a concern. In addition, it appears that the site would be significantly higher than Western Road at this point (In excess of 1m), and this compounds the impact upon Western Road. Again, the relationship is contrary to 'Saved' Policies CUD14, HSG5,

HSG9, and Policy CS7 of the Core Strategy 2008. I would suggest that 2 and a half storey flats at this point might be more appropriate.

The development will include the provision of affordable housing. Although I do not have comments back from the Council's Housing Section to date, I would expect that they would require the provision of useable amenity space for the affordable housing element, including amenity space to serve the affordable flats.

#### Sustainability:

The application proposes that the development meets the Code for Sustainable Homes Level 3 as a minimum. However, the Council's Sustainable Design and Construction SPD (2007) goes further, indicating that 50% of the provision should meet Level 4. It has not been demonstrated how the scheme would go towards meeting this target. The application should also demonstrate how the development would incorporate renewable energy production equipment to offset at least 20% of predicted carbon emissions. The failure to demonstrate that the development has been designed to fully take account of sustainability requirements, including modern energy conservation and energy efficiency measures, is contrary to Policy CS1 of the Core Strategy 2008, and the Council's SPD 'Sustainable Design and Construction' (2007).

#### S.106 Legal Agreement:

As you are aware, were the development found to be acceptable, the applicant would be expected to enter into a S.106 Legal Agreement in accordance with the Council's S.106 SPG and Circular 05/05, to offset these impacts and make the development acceptable in planning terms. You have submitted a financial viability statement in relation to affordable housing, and our Valuations Section are considering this at the moment. I will respond separately on the issue of affordable housing provision once I have their considered response.

In relation to other financial contributions; £458,239 would be required for education provision, and £324,938 for transport (£1266,000 RUAP for the residential element and £58,938 for the office element). I do not have the figure for leisure contributions to date, but will forward this information once I have further comments from the Council's Leisure Section.

Notwithstanding this, in the absence of a completed legal agreement to secure contributions towards transport (Reading Urban Area Package), local recreation/leisure and education infrastructure improvements the proposal fails to deal with its direct impact and is contrary to Policy TRN11b (Development and Traffic) of the Reading Borough Local Plan (1998), Policy CS9 (Infrastructure, Services, Resources and Amenities) of the LDF Core Strategy (2008) and 'Planning Obligations under Section 106 of the Town and Country Planning Act 1990' (Supplementary Planning Guidance).

#### Other consultees:

I have forwarded comments from the Council's Environmental Health Section, as well as the Council's archaeological advisor, which I trust will be of use.

#### Conclusion:

The application has not been accompanied with a FRA as required by PPS25, and contains insufficient information in relation to ecology. The development is considered to be

unacceptable in relation to transport and highway safety implications, open space provision, impact upon the listed building and impact upon surrounding residential properties. It contains insufficient information in relation to finished site levels and sustainability. An acceptable Legal Agreement has not been prepared. The application is therefore unacceptable in its present form.

I am aware that you are preparing, or have recently submitted, additional information relating to a number of the topic areas above, including amended plans, and have recently met with the Council's Transport (Development Control) Section. However, there is not sufficient time to assess any additional information, and allow for a further round of public consultation, before the expiry of the application. The application will be considered by planning committee at the next available meeting, December 3<sup>rd</sup>, where it will be recommended for refusal.

Please do not hesitate to contact me if you have any queries regarding the above.

Yours sincerely,

Justin Turvey  
Planning, South and West Area Team  
For the Planning Manager