

DELEGATED APPLICATION REPORT - Application No. 230844/FUL

Address: Site to rear of 114 Queens Road, Caversham, Reading

Proposal: Construction of 3 x 3-bed / 5 person residential dwellings with associated parking, access, refuse storage and landscaping

Case officer: Ethne Humphreys

Target date: Originally 12/10/2023; EOT agreed until 25/10/2023

Site Description and Surrounding Area

The application site relates to a parcel of land located on the north side of Queens Road, on the corner with Mill Road to the east. The land is adjacent the rear gardens of No's 114 Queens Road and No's 36-38 Coldicutt Street to the west. The site appears to be used as an informal car park, utilising a vehicle entrance from Mill Road.

The site is within Flood Zones 2 and 3 as designated by the Environment Agency.

Proposal

The application seeks planning permission for a terrace of 3 x 3 bed dwellings.

The proposed materials include:

Red brick

Grey/black slate roof tiles

Buff and blue banding and buff stone headers

Sash effect window frames

6 car parking spaces are proposed, along with indicative soft landscaping/tree planting.

Plans Considered

Location Plan PL-01

Existing Site Plan PL-02

Proposed Site Plan PL-03

Proposed Floor Plans PL-04

Proposed Elevations PL-05

Proposed Street Elevation PL-06

Proposed Section and Outlook PL-07

Proposed Bike and Refuse Store PL-08

Received 16th June 2023

Daylight/Sunlight Report

Design and Access Statement

Energy Statement Report

Flood Risk Assessment

Supporting Statement

Transport Statement

Received 16th June 2023

Arboricultural Report

Tree Constraints Plan
Tree Schedule
Received 25th August 2023

Planning History

97-00170-FUL New detached bungalow. Refused and Dismissed at Appeal.
91-0616 Erection of a pair of semi-detached houses. Refused and Dismissed at Appeal.
90-0467 Erection of four flats. Refused and Dismissed at Appeal.
88/TP/437 Erection of one pair of semi-detached chalet bungalows. Refused.
87/TP/728 Erection of one pair of semi-detached chalet bungalows. Refused.
86/TP/1268 Erection of three dwellings. Refused.

The applicant sought pre-application advice for a similar scheme under reference 221122. This concluded that officers would be unable to support an application for the proposed development, for reasons including flood risk, character of the area, amenity of surrounding and future occupiers, lack of amenity space and affordable housing.

Consultation Responses

Transport - No objection subject to revised plans and conditions to include submission and approval of construction method statement, vehicle and cycle parking, visibility splays, tracking diagrams, and bin store details. Discussed further below.

Natural Environment - No objection subject to conditions relating to landscaping. Discussed further below.

Environmental Protection - No objection subject to conditions to control construction hours, submission and approval of a construction method statement, bin store details and contaminated land assessment/remediation scheme. Discussed further below.

Ecology - Object. Proposals do not demonstrate net gain in biodiversity. Discussed further below.

Environment Agency - No comments received.

Public Consultation

Nearby neighbouring properties were notified by letter and a site notice was displayed at the site.

No neighbour letters of representation received.

Summary of discussions with applicant/agent:

The agent was advised of concerns relating to the design/layout/plot coverage and impact on the street scene, insufficient amenity space, landscaping and neighbour amenity concerns, ecology and affordable housing matters.

Whilst it is noted that viability discussions appear to be underway at the time of writing this report, the above concerns are well beyond any situation whereby an Affordable Housing offer

would affect the overall planning balance in this instance.

The applicant was given the opportunity to withdraw the application but has opted to receive the decision notice.

Equality Act

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

Legal and Planning Policy Context

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) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

Accordingly, the National Planning Policy Framework and the following development plan policies and supplementary planning guidance are relevant:

National Planning Policy Framework 2023
National Planning Guidance 2014 onwards

The relevant sections of the NPPF are:

Section 2 - Achieving Sustainable Development
Section 8 - Promoting Healthy and Safe Communities
Section 9 - Promoting Sustainable Transport
Section 11 - Making Effective Use of Land
Section 12 - Achieving Well-Designed Places
Section 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15 - Conserving and Enhancing the Natural Environment

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development
CC2: Sustainable Design and Construction
CC3: Adaptation to Climate Change
CC5: Waste Minimisation and Storage
CC6: Accessibility and the Intensity of Development
CC7: Design and the Public Realm
CC8: Safeguarding Amenity
CC9: Securing Infrastructure
EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland

- EN15: Air Quality
- EN16: Pollution and Water Resources
- EN18: Flooding and Sustainable Drainage Systems
- H1: Provision of Housing
- H2: Density and Mix
- H3: Affordable Housing
- H5: Standards for New Housing
- H10: Private and Communal Outdoor Space
- TR1: Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-Related Matters
- TR5: Car and Cycle Parking and Electric Vehicle Charging

Supplementary Planning Documents

- Affordable Housing SPD (2021)
- Revised Parking Standards and Design SPD (2011)
- Revised SPD on Planning Obligations under Section 106 (2019)
- Sustainable Design and Construction SPD (2019)
- Employment Skill and Training SPD (2013)
- Tree Strategy (2021)
- Biodiversity Action Plan (2021)

Appraisal

Principle of Development/Land Use matters

The site is currently in use as an informal car parking area. However, it appears to have formerly been part of the rear gardens of No's 36, 38 Coldicutt Street and 114 Queens Road, albeit the site is fenced off from these properties. Assessing the site as residential garden is against Policy H11 (Development of Private Residential Gardens). This requires that new residential development that involves land within the curtilage of private residential gardens will be acceptable where:

- a) It makes a positive contribution to the character of the area;
- b) The site is of an adequate size to accommodate the development;
- c) The proposal has a suitable access;
- d) The proposal would not lead to tandem development;
- e) The design minimises the exposure of existing private boundaries to public areas;
- f) It does not cause detrimental impact on residential amenities;
- g) The emphasis is on the provision of family housing;
- h) There is no adverse impact on biodiversity, and
- i) The proposal does not prejudice the development of a wider area.

As the remainder of this report demonstrate, the proposal has failed to satisfactorily meet a number of other policy criteria.

Flood Risk

The site is located within Flood Zones 2 and 3 as designated by the Environment Agency. Policy EN18 (Flooding and Drainage) sets out the planning permission will not be granted for development that would increase risks arising from flooding.

Residential use is classified as a 'More vulnerable' use (within the [Planning Practice Guidance](#) - table 2 of the Flood Risk and Coastal Change guidance), which will only be compatible if meeting the requirements of the Sequential and Exception tests. As such the principle of the proposed redevelopment of the site for residential purposes is subject to the sequential test process in accordance with the National Planning Practice Guidance (NPPG). Only if both the sequential test and exception tests are passed would the required Flood Risk Assessment (FRA) be reviewed.

The Sequential Test seeks to steer new development to areas with the lowest probability of flooding. The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. Within each flood zone, surface water and other sources of flooding also need to be taken into account in applying the sequential approach to the location of development. In the case of residential dwellings, the Council's approach is that the search area shall be the whole Borough.

The Council's latest Housing Trajectory as published in the Annual Monitoring Review 2021 demonstrates that the Council has a greater than 5 year housing land supply and that the total supply of housing exceeds the figure for identified need and therefore sufficient land at a lower risk of flooding exists and the sequential test would be unlikely to be passed and permission unlikely to be granted. However, a closer examination of the figures reveals that whilst the need for family housing (3 beds or more) makes up over half the identified need, the supply falls well short based on current figures. Similarly, there is a significant undersupply of affordable housing when measured against the identified need. Provision of affordable housing would also be sequentially preferable. Therefore, the availability of land for these particular types of housing (3 bed and larger and affordable housing) is unlikely to be met in areas of lower risk of flooding.

The scheme proposes 3 x 3 bed dwellings. The scheme does not, however, provide a contribution towards affordable housing within the Borough. The submitted sequential test is silent on this matter. Given this, it is not considered that the proposal satisfactorily passes the sequential test. It may be possible to pass the Sequential Test if each dwelling were proposed as Affordable family-sized housing. But this is not the current proposal. Given that the sequential test is not considered to be passed, there is no need to consider the exception test. As such the proposal is contrary to Policy EN18 of the Reading Borough Local Plan.

Affordable Housing

Policy H3 (Affordable Housing) requires that sites of 1-4 residential dwellings must provide a financial contribution towards provision of affordable housing elsewhere in the Borough equivalent to 10% of the housing.

A Viability Appraisal has been submitted with the application. Examination of the, the viability submission has not concluded however given the wider concerns outlined in this report this is not determinative at this stage and the current zero Affordable Housing offer is not currently agreed. Therefore, the application will be refused on the basis of not providing an appropriate contribution to affordable housing and being in the absence of a s106 legal agreement to secure that appropriate contribution towards affordable housing, contrary to Policy H3.

Design Considerations and Impact on Street Scene

Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments.

Paragraph 130 of the NPPF 2023 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment.

The National Design Guidance identifies 10 key components for good design and of particular note is the characteristic of 'Context' and it states that "well designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones." Additionally, there is specific reference to 'views inwards and outwards'.

The site occupies a prominent location on the corner with Queens Road and Mill Road. Whilst sited to the rear of the houses of Coldicutt Street, the proposed houses would front Queens Road with a side return along Mill Road. The area is largely characterised by terraced properties, most of which are two storey dwellings, with long and narrow rear gardens.

Due to the current context and the corner location, there is a distinct openness to the site. In contrast to this existing character, the proposals would dominate the site visually and appear cramped in relation to the site boundaries particularly to the south east boundary. There would be insufficient space for meaningful amenity areas or landscaping, with large amounts of the site dominated by built form, hardstanding for car parking and bin/bike storage which results in a cramped overdevelopment of the site. The resultant plots to accommodate the proposed dwellings would have uncharacteristic plot sizes, with the siting and layout being at odds with the established urban grain.

The plans indicate that if a pedestrian cannot negotiate steps (the only method of access from the parking spaces), they would have to make their way round the corner into Mill Road (on the opposite side of the site) to access the dwelling via the ramped access. This is not a good

design solution especially in terms of equality of access. The proposed scale and layout would also result in other concerns as set out elsewhere in this report.

Whilst the proposed materials would reflect that used in the locality, the materials are not considered sufficient in themselves to create visually interesting buildings and the proposals are considered to introduce a dominant form of development within a prominent location which would not enhance the street scene.

In overall terms, the proposal appears overdeveloped with little regard to existing character, or the need to provide appropriate landscaping. The proposal is not of sufficient high quality design and would not respond positively to its context, contrary to Policies CC7 and H11 of the Reading Borough Local Plan 2019.

Amenity of Future Occupiers

Policy H5 (Standards for New Housing) seeks that all new housing is built to high standards. Policy EN15 (Air Quality) seeks to protect existing and future occupiers from the impact of poor air quality and Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.

All the proposed units would meet the size standards set out in the Nationally Prescribed Space Standards under Policy H5, and, on balance, noting the roof windows that open outwards, it is considered that all units would be served by adequate outlook and daylighting.

Policy H10 deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. *"The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity"*. Para 4.4.87 of the RBLP sets out that *"in the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals: (b) Flats outside central Reading: 1 and 2-bedroom: 25 sq m per flat.."*

As acknowledged within the submission, the amenity spaces would not meet this guidance. As highlighted above, the subdivision of the land to accommodate the 3 units would result in uncharacteristically small rear gardens when compared to the prevailing gardens in the locality. Furthermore, given the small size of the gardens, there would also be increased pressure to prune proposed trees and this further compromises functional useable space, again indicative of the overdeveloped nature of the proposals. It is noted that the garden of Plot 2 extends wider than the property, in front of the rear elevations of both adjacent plots - this is not a good design solution. The smaller gardens are considered to provide inadequate private garden amenity space to the proposed family units to the detriment of the future occupiers of the dwellings. The proposal is therefore contrary to Policies CC7, H10 and H11 of the Reading Borough Local Plan 2019.

Impact on Neighbouring Amenity

Policy CC8 (Safeguarding Amenity) requires developments to not cause a detrimental impact on the living environment of existing properties in terms of: Privacy and overlooking; Access to

sunlight and daylight; Visual dominance and overbearing; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; and Crime and safety.

Given the distance of the proposals to the north and west boundaries, it is not considered that there would be any materially visually dominant or overbearing effects to any neighbouring property.

There would be two upper floor windows on the west flank elevation facing towards No.114 Queens Road. These are shown on the plans to be obscurely glazed and given their small scale this is considered acceptable. Should the application have otherwise been supportable, this would have been controlled by condition to prevent loss of privacy.

There would be a distance of approximately 5m from the rear elevation of the proposed terrace and the boundary with No.34 Coldicutt Street. Given this short distance and number of upper floor windows facing this direction, the proposals are considered to result in actual and perceived overlooking of the garden of No.34 Coldicutt Street, harmful to the amenity of neighbouring occupiers. The proposal is therefore contrary to Policies CC8 and H11 of the Reading Borough Local Plan 2019.

The construction phase of the proposed development would also have potential to impact on the amenity of surrounding occupiers. Should the application have otherwise been supportable, conditions would have been recommended to secure a submission and approval of a construction method statement and to control construction hours to mitigate potential noise and dust impacts on the surrounding area.

Transport

Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically, this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

The site is located adjacent the rear gardens of No's 114 Queens Road and No's 36-38 Coldicutt Street to the west and is currently being utilised as a car park accessed via a vehicle crossover from Mill Road. Transport Officers have stated that confirmation is required as to who parks on the site but does not form a reason for refusal.

In accordance with the adopted Parking Standards and Design SPD, each dwelling would require 2 off street parking spaces. The submitted Block Plan illustrates that each dwelling is to be provided with 2 parking bays in tandem formation, served via a new vehicle cross over from Queens Road. The creation of a vehicle cross over would result in the loss of parking provision within the residential bays located on Queens Road. There is already a high level of parking occurring in the area and Transport would not support a formal break in the residential/shared parking bays fronting the development site unless protection markers were in place. It should

be noted that it is not permitted for vehicles to overhang the public highway as this can constitute an obstruction of the public highway under the Highways Act 1980.

The access should be illustrated on plans and should not exceed 10m in width. Visibility splays also need to be illustrated of 2.4m x 43m. The parking areas need to be made of permeable material, water run-off from the new dwellings onto the public highway is not permitted, an appropriate method of drainage needs to be provided within the site's curtilage including the use of suitable permeable surfacing materials. The Council's Transport Officer considers this could be dealt with through revised plans and does not form a reason for refusal.

Plans should illustrate the location of the telegraph pole on the sites boundary on Mill Road as well as the dropped crossing and other street signage located on Queens Road. Any costs required for the relocation if any equipment would be fully met by the applicant.

A licence would be required from the Highways Department to undertake any work on the Public Highway; this includes the creation of new vehicle crossovers and the reinstatement and realignment of the footway for the existing access on Mill Road. The Council's Transport Officer considers this could be dealt with through revised plans and does not form a reason for refusal.

Given the narrow nature of Queens Road and vehicles parked in the carriageway, tracking diagrams would need to be provided to demonstrate vehicles are able to reverse in and out of the spaces without conflict, and to ensure adequate forecourt depths of 6m can be provided. Tracking diagrams would be required. The Council's Transport Officer considers this could be dealt with through revised plans and does not form a reason for refusal.

As the development site is located in an area where the Councils Residents Parking Permit Scheme operates, under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area, therefore there should be an assumption that any future occupants of the houses would not be issued with resident or visitor parking permits; the appropriate condition and informative would be applied if a the application was otherwise supportable.

Policy TR5 required each new house to be provided with an electric charging point. 3 x ECP have been illustrated on plans and it is noted that the applicant has made reference to provision for each dwelling in the Transport Statement. This is acceptable.

The submitted block plan illustrates each dwelling would be provided with 2 cycle storage spaces in a shared storage unit. This provision is in accordance with the Councils current standards; however, there is insufficient depth provide to allow for the storage doors to be opened and manoeuvre in and out, a minimum of 1.5m forecourt depth should be provided, alternatively as each dwelling has its own private amenity area it would be more secure to provide storage in these areas. The Council's Transport Officer considers this could be dealt with through revised plans and does not form a reason for refusal.

A communal bin storage area has been illustrated on the submitted block plan; however, bin storage should not be located further than 15m from the access point of the site to avoid the

stationing of service vehicles on the carriageway for excessive periods and should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway. A collection point that allows for kerb side collection is required. The Council's Transport Officer considers this could be dealt with through revised plans and does not form a reason for refusal.

The construction phase of the proposed development would be likely to impact the surrounding highway network given the prominent location. Should the application have otherwise been considered supportable, a condition would have been attached to secure submission, approval and implementation of a detailed Construction Method Statement.

Natural Environment

Policy EN14 (Trees, Hedges and Woodland) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks proposal should include appropriate landscaping.

The Council's Natural Environment Officer has confirmed that there are no concerns with regards to existing trees - these are all off site with no root protection areas (RPAs) extending into the site and limited canopy overhang from two, which could be pruned back if necessary.

It is acknowledged that the Block & Site plan indicates 6 new trees; however, this is only indicative - the tree between the bin /bike store and rear of the parking spaces is unlikely to be feasible and the southern tree in Plot 3's garden is likely to be too close to the house. Given the small size of the gardens, there would also be increased pressure to prune and this further compromises functional useable space, again indicative of the overdeveloped nature of the proposals.

The Natural Environment Officer notes the comment in the arboricultural report about soil conditions and that the site contains clay soil. As such, foundations and tree species need to be carefully considered in order to meet NHBC guidelines to minimise the chance of tree related subsidence in the future.

Whilst landscaping details are insufficient, the Council's Natural Environment Officer considers that this could have been dealt with by way of condition, should the application have otherwise been supportable.

Ecology

Policy EN12 (Biodiversity and the Green Network) seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable.

The application has not been submitted with a biodiversity net gain calculation using the latest DEFRA Metric and as such fails to demonstrate that biodiversity net gain would be achieved. Furthermore, as above, no details of landscaping strategy have been provided. As such, the development has failed to demonstrate that a biodiversity net gain would be achieved, through

ecological enhancements either on or off site. The proposal is therefore contrary to Policies H11, EN12 and EN14 of the Reading Borough Local Plan 2019.

Given the nature of the scheme, it would also have been appropriate to ensure that ecological enhancements were provided, namely bird/bat boxes and wildlife friendly landscaping. This could have been secured by way of condition in compliance with Policy EN12 had the proposal been able to be supported.

Contaminated Land

Policy EN16 (Pollution and Water Resources) required that developments on land affected by contamination can be satisfactorily managed or remediated against so that it is suitable for the proposed use.

The site has the potential to have caused contaminated land e.g due to oil spills, storage of hazardous materials. The proposal could introduce new pollutant linkages between contaminated land and sensitive receptors at the site. Should the application have otherwise been supportable, Environmental Protection colleagues recommend the standard four-stage conditions to ensure that the possible presence of contamination is thoroughly investigated and removed/mitigated if necessary (3 of the conditions being pre-commencement).

Sustainability

Policy CC3 (Adaptation to Climate Change) requires that development proposals incorporate sustainable design practices to take account of climate change. Policy H5 (Standards for New Housing) requires that all new housing is be built to the higher level of water efficiency standards under Building Regulations and achieves at a minimum a 19% improvement in the dwelling emission rates above the Building Regulations standards.

Should the application have otherwise been recommended for approval, conditions would have been recommended to ensure the development meets the following requirements:

- Higher water efficiency standards of 110 litres per person per day; and
- A 19% improvement over building regulations energy requirements

Although secured by planning condition, these new requirements would have been administered through the Building Regulations, with confirmation of compliance submitted to the LPA to discharge the condition.

Community Infrastructure Levy

The proposal would be a Community Infrastructure Levy (CIL) liable development. The applicant has provided the CIL Additional Information Form. If the scheme had been acceptable an informative would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

Overall Planning Balance and Conclusion

It is acknowledged that there would be some planning benefits associated with the proposed development, such as the provision of 3 residential units to assist with the Borough housing targets. However, there are considered to be a number of significant shortfalls, such as the

visual intrusiveness, proposed scale and layout which results in the proposals being harmful to the character and appearance of the area. In addition, there are significant concerns regarding flood risk, the impact on the amenity of neighbours, insufficient amenity space for future occupiers and unproven biodiversity net gain. Furthermore, the affordable housing are unproven/not agreed.

RECOMMENDATION:

REFUSE Planning Permission for the following reasons:

1. The proposed development, due to its prominent siting, excessive scale, site coverage, layout and insufficient landscaped areas would represent a cramped overdevelopment of the site which fails to accommodate built form, parking areas and landscaping in a manner that enhances the character and appearance of the area. The resultant plots would have uncharacteristic plot sizes, with the siting and layout being at odds with the established urban grain. As such the proposal would be harmful to character and appearance of the street scene and wider area. The proposal is therefore contrary to Policies CC7 and H11 of the Reading Borough Local Plan 2019.
2. The proposed development, due to the minimal size and inappropriate siting of the gardens, combined with the overshadowing from trees on the site, would not provide adequate and functional outdoor private amenity space for future occupiers. This would also not reflect the size or character of private residential gardens in the surrounding area. The proposal is therefore harmful to the amenity of future occupiers contrary to Policies CC7, H10 and H11 of the Reading Borough Local Plan 2019.
3. The proposed development, due to its scale, siting, number and position of windows in relation to neighbouring dwellings and private gardens to the rear of the site along Coldicutt Street would result in overlooking and loss of privacy with consequent harm to the amenity of users of those gardens, The proposal is therefore contrary to Policies CC8 and H11 of the Reading Borough Local Plan 2019.
4. It has not been demonstrated that there are no alternative sites at lower risk of flooding that should be developed in sequential preference to the application site. The proposal is therefore contrary to Policy EN18 of the Reading Borough Local Plan 2019.
5. The proposed development has failed to demonstrate that the development would not result in a net loss of biodiversity or that a net gain for biodiversity would be achieved. The proposal is therefore contrary to Policies H11, EN12 and EN14 of the Reading Borough Local Plan 2019.
6. In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough. The proposal is therefore contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021.

Informatives:

1. This decision relates to the following plans:

Location Plan PL-01

Existing Site Plan PL-02

Proposed Site Plan PL-03
Proposed Floor Plans PL-04
Proposed Elevations PL-05
Proposed Street Elevation PL-06
Proposed Section and Outlook PL-07
Proposed Bike and Refuse Store PL-08
Received 16th June 2023

Daylight/Sunlight Report
Design and Access Statement
Energy Statement Report
Flood Risk Assessment
Supporting Statement
Transport Statement
Received 16th June 2023

Arboricultural Report
Tree Constraints Plan
Tree Schedule
Received 25th August 2023

2. The local planning authority has worked with the applicant in a positive and proactive by advising of the concerns with proposal and providing for the opportunity for the application to be withdrawn. The applicant chose not to withdraw the application, hence the issuing this refusal notice.
3. Without prejudice to any future application or appeal, the applicant is advised that reason for refusal 6 could be overcome with the completion of a satisfactory s106 legal agreement.
4. The applicant is advised that the refused scheme, had it been able to be approved, would have been a CIL (Community Infrastructure Levy) liable development.