

Planning Department
Reading Borough Council
Civic Offices, Bridge Street Plaza West
Bridge Street
Reading, RG1 2LU

KM/357

BY E-MAIL

30 May 2023

Dear Sir or Madam

RE: LAND AT QUEENS ROAD, CAVERSHAM, RG4 8DN
FULL PLANNING APPLICATION: 3 NEW RESIDENTIAL DWELLINGS
SUPPORTING PLANNING INFORMATION

This letter is submitted to Reading Borough Council ("Council"), on behalf of Gravitas Property Group Ltd ("Applicant"), in support of new residential dwellings at Land at Queens Road, Caversham, RG4 8DN ("Site").

This Full Planning Application ("Application") seeks confirmation from the Council for the: *"Construction of 3 x 3-bed / 5 person residential dwellings with associated parking, access, refuse storage and landscaping"*.

The contents of this letter is as follows:

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| 1. Introduction | 5. Relevant Planning Policy |
| 2. Site Description | 6. Planning Considerations |
| 3. Planning History | 7. Conclusions |
| 4. Details of the Proposal | |

1. INTRODUCTIONS

Of note, Pre-Application Consultation was undertaken with the Council (Ref. 221122/PREAPP) and the comments received have been reviewed and incorporated into the proposed development, as submitted.

Full Planning Application Package

This letter should be read in conjunction with the following documents:

- Completed Application Forms including CIL Questions prepared by CREATE Planning
- Flood Risk Assessment including Sequential and Exception Test prepared by Syntegra Consulting
- Daylight and Sunlight Report prepared by Syntegra Consulting
- Energy Strategy Report prepared by Syntegra Consulting
- Transport Statement prepared by Kronen Limited

- Design and Access Statement prepared by CDP Architects
- Drawings prepared by CDP Architects, including:

PL-01 – Proposed Block Plan

PL-02 – Existing Site Plan

PL-03 – Proposed Site Plan

PL-04 – Proposed Plans

PL-05 – Proposed Elevations

PL-06 – Proposed Street Elevation

PL-07 – Proposed Section and Outlook

PL-08 – Proposed Bike and Refuse Store

- Affordable Housing Statement prepared by AGA

The Applicant has paid the Application Fee.

2. SITE DETAILS

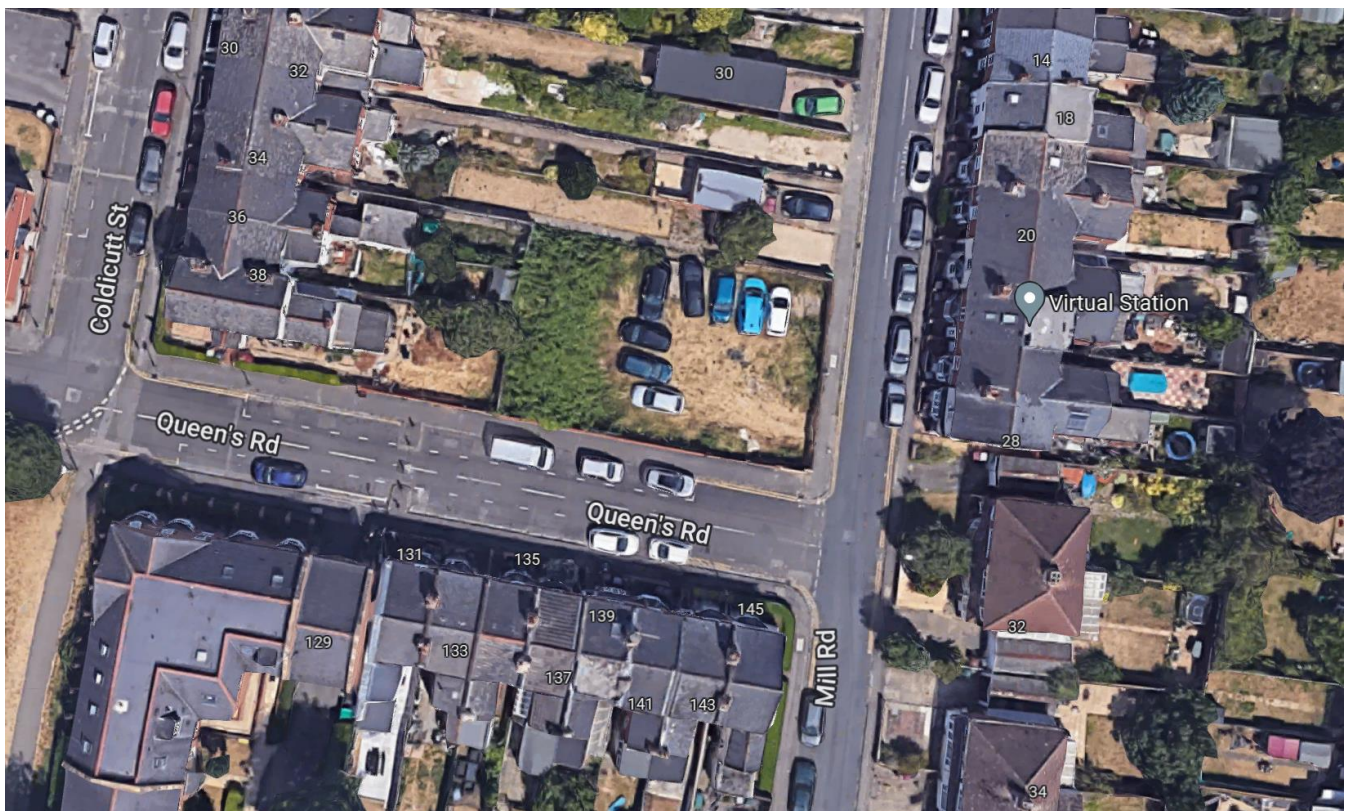
Site Description

Please refer the supporting Design and Access Statement prepared by CDP Architects.

The 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 is used as car park, utilising a vehicle entrance from Mill Road.

There are some self-seeded grasses on the Site and gravel. There are no elements of hardstanding.

Google Map: Arial Photograph of Site



Photograph: View of Site from Mill Road



Context

Caversham is a suburb of Reading stretching from the River Thames up to the lowest reaches of the Chiltern Hills. Named areas include Emmer Green, Lower Caversham, Caversham Heights and Caversham Park Village. The Site sits within Lower Caversham which has no formal boundary but the name usually refers to the part of Caversham situated on lower ground to the east of central Caversham, close to the river Thames.

The area comprises of primarily residential development with some light industrial units located to the east. Services within the area include several primary schools and nurseries, Tesco Extra, bars and restaurants, children's centre, doctor's surgery, a range of different shops, and multiple recreational grounds and parks.

A number of the rear gardens on the east side Mill Road near the Site have large rear outbuildings and contain a large number of vehicles resulting in a crowded streetscene that detracts from the character and appearance of the area.

To the south of the Site is large green area, Christchurch Meadows and the River Thames. To the north, east and west of the is more residential development.

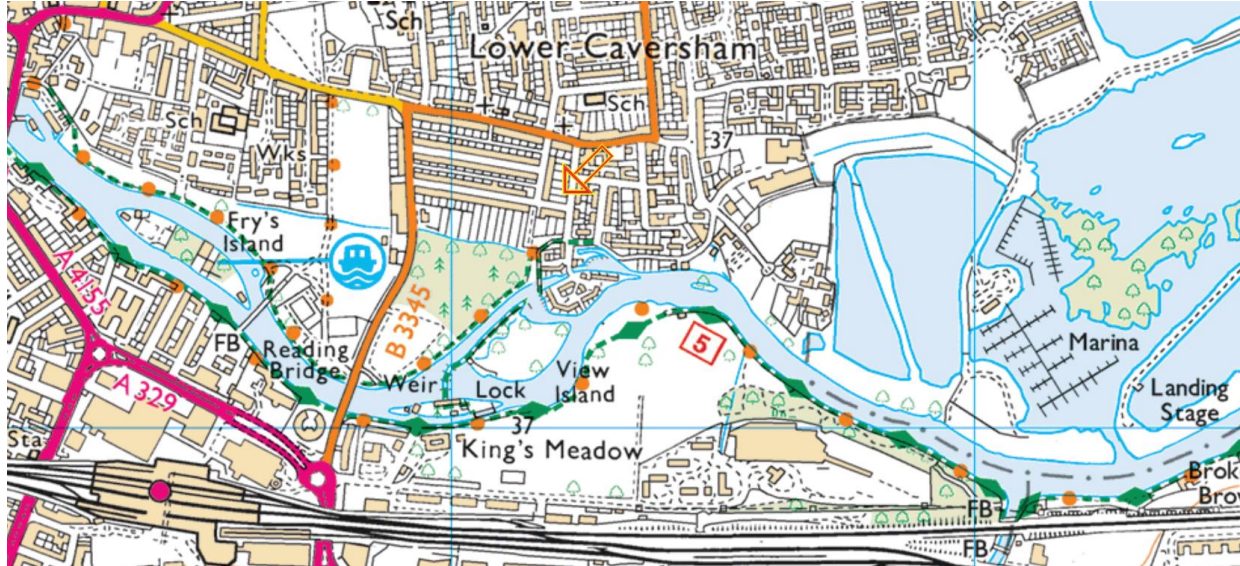
Heritage Assets

The Site is not designated within a Conservation Area.

Transport & Accessibility

Please refer the supporting Transport Statement prepared by Kronen Limited.

Street Map



Flood Risk

Please refer to the supporting Flood Risk Assessment including Sequential and Exception Test prepared by Syntegra Consulting.

The Site is located within Flood Zone 2 / 3 (a chance of a chance of flooding from rivers or seas of 1% - 3.3%+) and has a medium risk of flooding from surface water (a chance of flooding of between 1% and 3.3%).

EA Flood Risk Map for Planning



3. PLANNING HISTORY

A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website.

There are no recent planning applications of note on the Site. However, there is a dated dismissed appeal on the Site (Ref. 97/1028/FD/AH), which sought planning permission for the construction of three terrace houses. The appeal was dismissed 4th March 1998

Nearby Sites of Relevance

129 Queens Road

- Ref. 101163 - Erection of 11 no. 2-bed flats following part implementation of outline planning approval 03/01251/OUT and approved matters approval 07/01642/REM – Approved 22/07/2010

34, 36, 36a Mill Road 210206

- Single storey front and two storey side and rear extension at 34 Mill Road. First floor rear extension at 36 Mill Road. Single storey front and rear and two storey side extension at 36A Mill Road. Refused and Dismissed at Appeal

4. DETAILS OF THE PROPOSAL

Please refer the supporting Design and Access Statement prepared by CDP Architects.

The Proposal is for the: *“Construction of 3 x 3-bed / 5 person residential dwellings with associated parking, access, refuse storage and landscaping”.*

Dwg No. PL-03 – Proposed Site Plan



PL-05 – Proposed Elevations



Proposed Queen's Road Elevation



Proposed Side Elevation (west)



Proposed Mill Road Elevation



Proposed Rear Elevation

The dwellings would be set 0.75m from the natural ground floor level to ensure all living accommodation is located above the breach level. Access to the dwellings would be provided via a ramp to the front and stairs to the rear. The dwellings would be elevated above ground floor level to ensure that the finished floor level would be above the peak flood level.

5. RELEVANT PLANNING POLICY

The Council's Development Plan, given its statutory status, is the starting point when considering planning applications. Section 70 (2) of the Town and Country Planning Act 1990, states that the local planning authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where regard is to be had to the Development Plan in the Planning Acts and confirms that applications for planning permission must be determined in accordance with the Plan unless material considerations indicate otherwise.

Development Plan

The Development Plan relevant to this application comprises the Reading Borough Local Plan ('RBLP'), adopted in Nov 2019.

▪ Reading Borough Local Plan, November 2019

The Local Plan was adopted in November 2019 and sets the policies for development in Reading up to 2036. It pre-dates the most recent revision of the National Planning Policy Framework ('NPPF'), updated in July 2021. Whilst not replacing the Development Plan as the starting point for decision-taking, this provides the most up-to-date planning policy guidance, therefore an important material consideration.

The relevant polices include (but are not limited to):

- CC1 - Presumption in favour of sustainable development
- CC2 - Sustainable Design and Construction
- CC3 - Adaption to Climate Change
- CC5 - Waste Minimisation and Storage
- CC6 - Accessibility and the Intensity of Development
- CC7 - Design and the Public Realm
- CC8 - Safeguarding Amenity
- 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

Online Proposals Map



There are no policy designations of note in place on the Site. However, the Site is located within close proximity to Thames Valley, a designated Major Landscape Feature, Hills Meadow, a Local Green Space and an Air Quality Management Area.

Other Material Considerations

■ Reading Supplementary Planning Documents ('SPD's') / Guidance ('SPG's')

The Council has a number of SPD's which are other relevant material considerations against which this planning application should be determined:

- Sustainable Design & Construction SPD (2019)
- Revised Parking Standards and Design SPD (2011)
- Planning Obligations under Section 106 SPD (2015)
- Affordable Housing SPD (2021)
- Tree Strategy for Reading (March 2021)
- **National Planning Policy Framework (NPPF, 2021)**
- **Technical Housing Standards – Nationally Described Space Standard (DCLG, 2015).**
- **National Planning Policy Guidance 2014 (NPPG)**

6. PLANNING CONSIDERATIONS

The main planning considerations are:

- Principle of Development
- Density and Housing Mix
- Design and Impact on the Character and Appearance of the Area
- Impact on Existing and Future Occupiers
- Amenity Space
- Transport & Parking
- Landscaping, Trees and Ecology
- Sustainability
- Affordable Housing, S106 and CIL Obligations

Principle of Development

Land Use Considerations

A key Government objective is to significantly boost the supply of new homes (Section 5 of the NPPF) and the local housing requirement as set out within Policy H1 (Provision of Housing) which confirms that there is a pressing need for additional housing in Reading and the surrounding area.

The National Planning Policy Framework ("NPPF") sets out a presumption in favour of sustainable development and advises Councils to take a positive approach to delivering new homes. The NPPF also attaches great importance to the design of the built environment stating that developments should be visually attractive because of good architecture. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Section 5 of the NPPF, in relation to 'delivering a sufficient supply of homes,' notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. Section 11 encourages making as much use as possible of previously developed land for housing, identifying that substantial weight should be given to the value of using suitable brownfield land within settlements for homes, and welcomes opportunities to remediate despoiled, degraded and derelict land.

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

The Site has been used as a car parking since March 2020.

Principle of Housing

Policy H1 of the Local Plan sets out the Council's target for an additional of 15, 847 homes (averaging 689 homes per annum) for the plan period (2013-2036).

The Proposal would provide a net gain in housing through the redevelopment of underutilized brownfield land in a predominantly residential location. Whilst it is acknowledged that the net gain of three residential dwellings is a small contribution to towards meeting the Boroughs housing needs, it is, never-the-less, an important one. Indeed, with the role that small sites play in achieving housing targets and alleviating pressure on Green Belt and Metropolitan Land is well recognised.

The existing Site serves as informal car park, the loss of which is not resisted by local policy, nor would the principle of its change of use cause harm to the character or appearance of the area.

Additionally, the Site is located within a central urbanised area of Reading, located in close proximity to the boundary of the Central Reading Area located on the opposite side of the River Thames.

As such, the principle of development of the Site for three residential dwellings is considered in line with national and local policy objectives.

Density & Housing Mix

The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. Achieving an efficient use of the land within the context of any central and sustainability located site is a key priority both at a national and local level. The NPPF states that LPAs should actively "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". In general terms, officers support those urban design principles which encourage an ambitious approach to density on such sites.

Policy H2 (Density and Mix) specifically considers density and mix and requires that an appropriate density of residential development is informed by the character and mix of uses of the area in which it is located and its current and future level of accessibility.

Density

The appropriate density of residential development will be informed by a range of factors, including the character and mix of uses of the area, the housing mix, the need to achieve high quality design, site accessibility, and the need to minimise environmental impacts. As such, density should not be considered in isolation - it is a useful indicator in seeking to meeting housing targets, but not necessarily as good an indicator of the likely form, quality, or appropriateness of a scheme.

Housing Mix

Policy H2 (Density and Mix) identifies that wherever possible, residential development should contribute towards meeting identified needs in respect of housing mix, and in particular, for family homes of 3 or more bedrooms. The Policy seeks that at least 50% of the homes outside centres will be 3 bed or larger.

The proposals include 3 x 3 bedroom dwellings and is therefore in accordance with Policy H2 in this regard. The overall mix would provide a variety of unit sizes and types which would address the need for housing across Reading. This is considered to be a key benefit of the proposed development - providing family sized housing to meet identified housing needs. The proposed mix of dwellings will be secured by way of condition.

Design & Impact on Character of the Area

Please refer the supporting Design and Access Statement prepared by CDP Architects.

The NPPF places great importance and weight on the creation of high-quality buildings, identifying it as fundamental to what the planning and development process should achieve, with good design a key aspect of sustainable development. Paragraph 130 goes on to state that development should establish or maintain a strong sense of place, be sympathetic to local character and history and be visually attractive.

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'.

Local Policy CC7 requires development to be of a high quality and sympathetic to the character and visual quality of the area. Proposals should reflect, enhance and not be detrimental to the character or visual amenity of the landscape they might affect.

The prevailing character of the area comprises red brick terrace row housing with some lighter brick detailing, large bay windows and pitched grey slate roofs.

In addition to this typology, there are examples of other housing forms and styles, including 114 Queens Road which is a large, side facing white rendered house, and Nos. 32 – 36 Mill Road which are semi-detached residential dwellings.

The Proposal comprises three terraced dwellings typical of the architectural style, form and detailing of the residential dwellings found in the immediate area.

The height of the development, whilst raised 0.75m above natural ground level to account for flood breach levels, would be kept at two storeys, including habitable accommodation in the roofspace, to match the heights and styles of the neighbouring residential dwellings whilst making efficient use of the development potential of the Site.

Given the siting and setback of the proposed dwellings, it is not considered that the development would have an overbearing or dominating presence on the street scene or neighbouring properties. Rather, the Proposal is considered to provide a significant improvement to the character and appearance of the street scene and immediate area by replacing the existing informal and unsightly car park with high quality residential dwellings that embody the prevailing design characteristics of the area to meet housing need.

Dwg No. PL-06 – Proposed Street Elevation



Impact on Existing & Future Occupiers

Please refer the supporting Daylight and Sunlight Report prepared by Syntegra Consulting.

The NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing development from contributing to or being put at risk from unacceptable levels of pollution.

Local Policy CC8 seeks to ensure no detrimental impact on the living environment of existing and future occupants would result from development in regard to:

- Privacy and overlooking.
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell; and,
- Crime and safety

Policy CC8 goes on to state that: *“The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy”*

Existing Occupiers

The properties most likely to be affected by the Proposal are those immediately adjoining the Site, including 114 Queens Road and 36 - 38 Coldicutt Street.

The proposed development would be sited on the southeast corner of the Site. The western elevation of the Proposal would be set back a minimum of 8 meters from the shared boundary with 114 Queens Road, and 36 – 38 Coldicutt Street. This would ensure that the distance between the proposed dwellings and the rear most elevation of the original neighbouring dwelling houses (114 Queens Road, and 36 – 38 Coldicutt Street) would be in excess of 20 meters in all cases.

Whilst it is acknowledged that the minimum separation distances set out in Policy CC8 refer to a back-to-back relationship, and not back-to-side, and are guidance only, this guidance has been utilised as a baseline to ensure that the Proposal would not harm the amenity of the neighboring occupiers. The ample separation distance between the existing and proposed dwellings would ensure that any real or perceived sense of overlooking and loss of privacy would be mitigated. Windows on the western elevation have also been kept to the minimum necessary to ensure sufficient internal amenity standards whilst reducing any loss of privacy/ These windows could comprise obscured glazing to mitigate such impact, if required.

The minimum 8m separation distance of the Proposal from the western boundary line also ensures that the development would not have an overbearing or domineering impact on the neighboring properties or their gardens, nor would it create a sense of enclosure.

A 1.8m timber fence is proposed to provide additional privacy to current and future occupants.

In lieu of the above, it is not considered that the Proposal would result in any undue loss of daylight or sunlight to the neighbouring properties or their gardens, nor harm their amenity in regard to privacy, overlooking and overshadowing.

Future Occupiers

Local Policy H2 requires development to be of an appropriate mix and density, taking into account the character and mix of the area, highlighting a preference for family homes of three or more bedrooms.

Figure 4.7 of the Local Plan sets out the minimum internal space standards for residential development.

Minimum Gross Internal Floor Areas and Storage sq m)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

The Proposal seeks to provide 3 x 3-bed 5-person family sized dwellings with a GIA of 105 sq m each, which is in excess of the minimum required by figure 4.7 included above. Additionally, all habitable rooms meet the minimum size and width requirements as set out within the Local Plan.

All habitable rooms would be provided with large windows ensuring good levels of daylight, sunlight, outlook and ventilation are achieved.

Local Policy H10 seeks to ensure all developments have adequate and functional private or communal open space, the size of which should respect the size and character of similar spaces in the vicinity.

The Local Plan identifies that, for houses, usable private outdoor space should be no less than the gross floor area of the dwelling to which it relates measured externally and included garage space).

For flats, amenity space should be provided at a rate of 40 sq m per flat comprising 3 or more bedrooms. Each dwelling would have dedicated private external amenity space (ranging between 38 sq m – 49 sq m).

Whilst the amount of amenity space proposed represents a shortfall of the proposal when assessed against the recommended amount set out in the subtext of the Local Plan, this is guidance only. Rather, the policy wording requires amenity spaces to have regard to the character of similar spaces in the vicinity over setting specific standards.

The amount of private amenity space provided in the immediate area varies. Whilst a high proportion of properties are typified by long narrow rear gardens, a large number of these have been subdivided over the years, comprising informal car parking and dominated by large rear outbuildings.

The Site is also within close proximity to a variety of public large open spaces (including Hills Meadow and Christchurch Meadow) as well as other outdoor recreational facilities. Therefore, it is considered that the proposed amenity space is appropriate to the context and commensurate to the prevailing local character, and proposed housing typology.

Google Map: Public Amenity within Close Proximity of the Site



It is therefore considered that the amount of external amenity space proposed is sufficient, useable and appropriate to the character and appearance of the area, and the urban context of the Site.

Transport & Parking

Please refer to the supporting Transport Statement prepared by Kronen Limited.

Local Policy TR3 states that in determining proposals involving new or altered access onto the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where:

- Access and works to the highway comply with the adopted Transport Authority standards.
- The development would not have a material detrimental impact on the transport network.
- The proposals would not be detrimental to the safety of uses of the transport network including pedestrians and cyclists.
- The proposals would not generate regular HGV movements on unsuitable roads.

Local Policy TR4 requires developments to improve access too and integration of cycling facilities, including through provision of new facilities. Local Policy TR5 requires new development to provide car parking and cycle parking that is appropriate to the accessibility of sites location within the Borough, and to provide 10% of car parking spaces with electric vehicle charging points.

The Site is located within Zone 2 – Primary Core Area, an area defined as directly surrounding the core area and well served by public transport.

The Revised Parking Standards and Design SPD (2011) identifies the need for 2 parking spaces for 3+ bedroom dwellings located in Zone 2, which this proposal adheres to.

The Application demonstrates that there would be no detrimental impact on the local area arising from the development in regard to parking and highways.

Cycle Parking

The Parking SPD sets out a minimum requirement for cycle parking spaces for the development. Covered and secure communal cycle storage would be provided in the shared amenity space and would provide space for at least 6 cycles in accordance with the Parking SPD.

Refuse & Recycling Facilities

The submitted site plan shows refuse and recycle storage would be located in the shared amenity area to the west of the Site. Refuse and waste storage would be provided in accordance with local requirements.

Landscaping, Trees and Ecology

Please refer the supporting Design and Access Statement prepared by CDP Architects.

Policy EN12 states that, for all sites, development should not result in a net loss of biodiversity and should provide for a net gain in biodiversity wherever possible. Development should also protect and wherever enhance features of biodiversity interest on and adjacent to sites and provide new tree planting, wildlife friendly landscaping and ecological enhancement.

Policy EN14 requires new development: “...make provision for tree retention and planting within the application site ... to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change”.

The Site has been divided into various areas of landscape and proposed landscape strategy seeks to soften and enhance the public realm, improving pedestrian access, mobility and creating a greener, healthier environment.

Flood Risk

Please refer to the Sequential and Exception Test prepared by Syntegra Consulting.

The National Planning Policy Framework (NPPF) states that within Flood Zone 3, ‘highly vulnerable’ uses should not be permitted in this zone. Paragraph 162 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with lower risk of flooding. The submitted Flood Risk Assessment has detailed measures to mitigate the risk of flooding and has demonstrated that there are no suitable locations for the proposed development in area of lower flood risk.

The Sequential Test aims to ensure that development does not take place in areas at high risk of flooding when appropriate areas of lower risk are reasonably available. The site is situated in Flood Zone 3 when using the Environment Agency Flood Map for Planning (Rivers and Sea).

A list of comparable alternative sites within the local area was explored to determine the availability of an alternative site for residential use was available in an area with a lower risk of flooding. The test was carried out by Syntegra Consulting who found that there were no sequentially preferable alternative sites available for development.

Further to the conclusions of The Sequential Test, an Exception Test was undertaken in accordance with paragraph 160 of the NPPF to ensure that the proposed development would provide wider benefits that outweigh the flood risks of the Site, ensuring the long-term safety of the proposed users and without increasing the risk of flooding elsewhere.

The wider sustainability benefits of the scheme have been set out in the ensuing section of this report. The following measures have been incorporated to ensure the safety of the development and its users.

The Council’s latest Housing Trajectory as published in the Annual Monitoring Review 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 the need for family housing (3 beds or more), which this proposal offers.

The Proposal would be raised 0.75m above natural ground floor level to ensure that the ground floor level would be set above the peak flood levels, to be agreed and confirmed with the Environmental Agency. An appropriate flood warning and evacuation plan would be developed for the site and put in place for the residents, include provision of a place of refuge. No sleeping accommodation is proposed on ground floor level and no self-contained lower ground floor residential units will be created as part of the development.

In light of the above, it is considered that the Site meets the provisions of the NPPF, is an acceptable site for residential development that would include measures to ensure the long-term safety of the proposed users of the Site.

Full details of a sustainable drainage system for the Site, including confirmation that the proposed development would not increase the risk of flooding elsewhere, would be provided at planning application stage.

Sustainability

Please refer to the supporting Energy Strategy Report prepared by Syntegra Consulting.

Local Policy CC3 requires all development to demonstrate how the design has incorporated measures intended to adapt to climate change.

Local Policy H5 requires all new build housing to be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations. It also requires a minimum of a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.

Local Policy CC2 notes that development should consider the use of natural resources appropriately and efficiently in relation to building design. Residential development should include recycling greywater and rainwater harvesting where it is possible to ensure energy and cost efficiency.

The Proposal would comply with water efficiency standards and other sustainability targets as a minimum. Photovoltaic panels and air source heat pumps are proposed.

Affordable Housing, S106 and CIL Obligations

Affordable Housing

Paragraph 64 of the NPPF states that, to support the re-use of brownfield land and vacant buildings, the “provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas”. Given the Proposal seeks to provide 3 residential units only and that site area is less than 0.5ha, the Proposal falls short of this threshold and the provision of affordable housing is therefore not required. However, it is acknowledged that Local Policy H3 requires site proposing 1 – 4 residential dwellings to provide a financial contribution to the equivalent of 10% of the housing.

Please refer to the supporting Affordable Housing Statement prepared by AGA.

Community Infrastructure Levy

The CIL charging schedule was adopted in 2015, to be applied to all new residential floor space. The adopted charging rate is £120 per sqm, indexed to £156.71 per sqm as of 31 March 2021.

The Proposal would provide 301.5 sq m of new residential floorspace.

7. CONCLUSIONS

The Proposal seeks to maximise the potential of an underutilised brownfield site through the construction of three high quality 3-bed, 5-person residential terrace dwellings with associated landscaping, parking, cycle storage, and refuse recycling storage. The proposed dwellings have been designed to reflect the local typology and vernacular, resulting in a development that improves the character and appearance of the existing Site, currently used as car park, and of the wide area.

All dwellings would exceed minimum national space requirements and would be provided with ample private external amenity space and communal external amenity space.

The dwelling would be sited well above the anticipate flood breach levels and not bedrooms would be located on ground floor level to mitigate flood risk for future occupants.

It is therefore considered that the Proposal would provide significant social, environmental, and economic benefits for the local area, and the Borough Council as a whole. Furthermore, the Proposal would accord with the relevant policies of the Local Plan and the provision of the NPPF. The presumption in favoured of sustainable development should therefore be applied.

I trust this letter is satisfactory for the registration and validation of this Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



James Lloyd B.Sc (Hons) M.Sc TCP MRTPI | Director