

DELEGATED APPLICATION REPORT - Application No. 211714/FUL

Address: 70-78 Wokingham Road, Reading

Proposal: Demolition of hotel and erection of 14 apartments

Case officer: Ethne Humphreys

Target date: EOT agreed until 6/01/23

Site Description and Surrounding Area

The application site relates to the 'Tower Hotel' located on the south side of Wokingham Road, opposite Palmer Park. The site has been in use as a hotel for a number of years and is rather piecemeal in appearance with elements being linked together to form two large buildings joined by a first floor bridge. The hotel comprises 33 bedrooms and there is a restaurant/bar at ground floor.

The site is located outside of a district or local centre, and the Wokingham Road local centre is located approximately 190m to the south east.

The site is also located within an area of potentially contaminated land and within an air quality management area.

The surrounding area is largely residential, with some commercial uses and to the north of the site on the opposite side of the road is Palmer Park a designated 'Local green Space and Public Open Space' (EN7Ed).

The site is located on a 'treed corridor' as designated in the Tree Strategy.

Proposal

The application seeks planning permission for the demolition of existing building(s) and for the erection of two residential blocks containing 14 flats in Use Class C3 with associated access and parking. These would comprise 5 x 1 bed units, 8 x 2 bed units and 1 x 3 bed unit.

Block A, as annotated on the plans, would comprise 8 units and would be 4 storey in height and Block B would comprise 6 units and would be 3 storey in height.

The proposed materials include:

Red facings with contrasting brick detail

Slate tile

White upvc windows

Aluminium doors

14 car parking spaces are proposed, along with indicated soft landscaping.

A viability appraisal has been submitted, seeking to justify a nil provision towards affordable housing elsewhere in the Borough.

The planning application is for a major category development.

Plans Considered

Drawing No: Location Plan PL-01

Received 19th October 2021

Drawing No: Proposed Site Plan PL-09 Rev 1

Drawing No: Proposed Ground Floor Plan PL-10 Rev 1
Drawing No: Proposed First Floor Plan PL-11 Rev 1
Drawing No: Proposed Second Floor Plan PL-12 Rev 1
Drawing No: Proposed Third Floor Plan PL-13 Rev 1
Drawing No: Proposed Elevations PL-14 Rev 1
Drawing No: Proposed Street Scene PL-15 Rev 1
Drawing No: 3D Images PL-16 Rev 1
Drawing No: Proposed Side Elevations Block A PL-17 Rev 1
Drawing No: Proposed Side Elevations Block B PL-18 Rev 1
Drawing No: Proposed Section Block A PL-19 Rev 1
Drawing No: Proposed Section Block B PL-20 Rev 1
Received 7th January 2022

Air Quality Assessment
Bat Scoping Report P4280
Noise Assessment
Planning, Design and Access Statement
Transport Statement
Received 19th October 2021

Energy Statement
Sustainability Statement
Received 4th April 2022

Planning History

021361/FUL Erection of two single storey front extensions for enlarged bathroom and shower room. Permitted.
990782/FUL Second Floor Extension. Refused and Dismissed at Appeal.
991637/FUL Erection of second storey to hotel to form 4 additional bedrooms, and fire escape from bridge. Refused.

Consultation Responses

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

Natural Environment - Object. Insufficient landscaping principles. 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, contaminated land assessment/remediation scheme and noise assessment and mitigation scheme.

Valuations - High-level review/initial comments provided that considers that further discussions around key input such as sales values, exiting use and development costs are necessary to assess the extent to which an affordable housing contribution or deferred payment mechanism (should no on-site or financial contribution be later shown to be justified up front) are deliverable.

RBC Housing - No comments received.

Ecology - Object. Further survey required to determine the impact on bats. Discussed further below.

Reading Economic Development Manager - No objection subject to employment and skills plan agreed for the site. Discussed further below.

Lead Local Flood Authority - Object. Absence of an acceptable Sustainable Drainage Strategy. Discussed further below.

Thames Water - No comments received.

Public Consultation

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

- 1, 3, 5 and 7 College Road
- 68 and 80 Wokingham Road

3 neighbour letters of objection have been received. The issues raised can be summarised as follows:

- Excessive height/visually dominant
- Out of keeping
- Overlooking/loss of privacy
- Over intensive use/too many flats
- Insufficient parking
- Should meet Net Zero/no solar power capture
- No provision for vehicle electric charging points
- Poor history of maintenance

Correspondence from Councillors

This decision is proceeding under delegated powers, as per alterations to the scheme of delegation (as agreed at Policy Committee 27/4/20). This allowed major planning applications, recommended for refusal by officers, to be determined under delegated powers, rather than be considered by the Planning Applications Committee. The application was originally 'called-in' by Councillor Williams. However, further to discussion with Members, it was agreed for the application to be determined under delegated powers.

Summary of discussions with applicant/agent:

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

Revised plans were received. However, these comprised comparatively minimal changes and given the multiple issues with the proposals were not reconsulted on and the decision notice is based on the original plans submitted. On this occasion, owing to the nature and breadth of the concerns raised, it was not considered worthwhile from the perspective of officers to enable the applicant to submit further/revised information. 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. However, no response was received and hence the issuing of this decision notice.

No pre-application advice was sought from the LPA prior to the submission of this application.

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 2021
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 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
EN7: Local Green Space and Public Open Space
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

Hotels are defined as 'Centre Uses' in the Local Plan. Policy RL3 (Vitality and Viability of Smaller Centres) states that within district, major local and local centres, development will not be permitted where there is net loss of 'centre uses' for 'non-centre uses' at the ground floor. In this instance, the site is outside the town centre and other district centres. There is no other specific policy which would protect the loss of the hotel and, therefore, there is no in-principle policy conflict with the loss of the hotel. The existing building is of no architectural merit, nor is it listed, locally listed or within a conservation area. It is also noted that the hotel is somewhat 'rundown' in appearance.

Further to the above, the proposed replacement of hotel on the site with residential development would provide additional dwellings to the Borough's housing on stock on previously developed land - the principle of which aligns with the broad objectives of Policy H1 (Provision of Housing) in assisting meeting annual housing targets. The application is also situated within a predominately residential area, whereby its location and accessibility are considered to accord with Policy CC6 (Accessibility and the Intensity of Development).

From a purely land use perspective, provision of housing is welcomed. Had the proposal been supportable, a condition would have been used to secure the mix proposed to remain policy compliant in this respect. However, this is subject to the more detailed considerations of relevant Local Plan policies and the context of the application site. As the remainder of this report demonstrate, the proposal has failed to satisfactorily meet a number of other policy criteria.

Affordable Housing

Policy H3 (Affordable Housing) requires that within new residential development of 10 more dwellings 30% of the dwellings provided are in the form of on-site affordable housing. In support of the application a financial viability appraisal assessment has been submitted, seeking to justify a nil contribution towards Affordable Housing.

This viability appraisal is currently under review by the Council's Valuer. As per the observations summarised under the consultation responses section above, it is considered that further discussions around key input such as sales values, existing use and development costs are necessary to assess the extent to which an affordable housing contribution or deferred payment mechanism are deliverable. Therefore, the viability submission is not agreed. It is therefore not

considered that the proposal is making an appropriate contribution towards affordable housing and the viability submission has not suitably justified a nil provision. 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.

Unit Mix

The proposed scheme seeks to provide 5 x 1, 8 x 2 and 1 x 3 bed units. Policy H2 (density and Mix) is clear that on new developments for 10 or more dwellings (such as this proposal for 14 units) outside the central area and defined district and local centres (with this site outside of all those areas) planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.

The scheme proposes 1 x 3 bed unit which equates to 7.14% 3 bed units. This is significantly below the 50% rate. Paragraph 4.4.10 of the supporting text to the policy does set out that other material considerations, such as viability could form a basis for deviating from the policy requirement. As noted above separately in respect of viability/affordable housing matters, the viability evidence is not agreed and hence cannot form a basis from deviating from the clear policy intention.

The supporting Design and Access Statement states that “the mix is broadly in accordance with the aspirations of policy H2 and figure 4.6 of the Local Plan”. It further states that whilst “the proposal does not include a larger proportion of 3-bed apartments, which is the aspiration for out of centre sites, the site is close to a number of centres and is similar to a centre site in terms of its characteristics”. This attempt at justification is not considered sufficient to deviate from the clear policy requirement.

Accordingly, it is considered that the proposed mix has not sufficiently justified the lack of over 50% of dwellings being of 3 bedrooms or more. In the absence of this justification the proposed development would not adequately contribute towards meeting the needs for the mix of housing in the Borough, contrary to Policy H2.

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.

Policy EN7Ed identifies that proposals will not be permitted that “erode their (Local Green Space’s) quality through insensitive adjacent development...”.

Paragraph 130 of the NPPF 2021 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 existing character of the immediate surrounding residential buildings is typically one of two storey scale (with roof accommodation/dormers) Victorian buildings. As above, there is no in-principle objection to the existing hotel building being demolished in design terms and it is considered that there is some scope for increased scale in this location. However, this needs to be of a carefully considered design to ensure that new development maintains and enhances the character of the area. In contrast, this particular proposal would present two large blocks of three storey and four storey, and this would appear far too bulky, in marked contrast with neighbouring buildings. The proposal would appear overly dominant, and the proposed scale and layout would also result in other concerns as set out below.

As can be seen from the proposed site plan the proposed buildings would be deep, with little relief to the side boundaries. Whilst indicative soft landscaping is shown, there would be a dominance of built form and hardstanding with little space for meaningful soft landscaping, resulting in overdevelopment of the site. As noted further below, the indicative hedging along the front boundary is positive. However, it would be reasonable to expect tree planting to the frontages, particularly given the sites location opposite Palmer Park and within a 'treed corridor' and the scale and layout of the development needs to provide sufficient space for this.

The massing and height of the proposed buildings is considered to result in a visually dominant form of development which further exacerbates the overdevelopment of the site. At four storey, Block B would offer a poor transition from the two and half storey building to the west, as shown on the proposed street scene drawing. Even Block A, whilst of a similar overall height to the building to the east, would feature eaves that would be much higher, exacerbating its height. The overall architectural approach does little to break up the mass of the two buildings and contrasts poorly with the adjacent Victorian era buildings. It is unclear where the proposed development takes its design cues from - it does not appear to either reflect local Victorian character or successfully reinterpret it in a modern way. In terms of detailing, the deep side elevations lack architectural detailing and there is a large amount of uncharacteristic glazing on the front elevations, particularly Block B. Indeed, the balconies on the front are both uncharacteristic as well as adding to the perceived mass of the building. The elevations lack visual interest and refinement, resulting in a poor quality appearance. The detailing taken as a whole appears incongruous and accentuates the over-large scale of the buildings.

As a result, the proposal would result in an excessively large, cramped, overdeveloped arrangement in terms of scale and a cramped relationship between buildings and spaces within the site in terms of layout. Whilst the proposed materials would broadly reflect that used in the locality, the materials are not considered sufficient in themselves to create visually interesting buildings or to mitigate the shortcomings of the architecture. The proposals are considered to introduce a dominant form of development within a prominent location which would appear visually incongruous with the adjacent buildings, would not enhance the street scene and nor would it enhance the visual amenities of the adjacent Palmer Park.

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 EN7.

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.

In relation to No.80 Wokingham Road to the south east, whilst the proposed building Block B would be deep along this boundary, given the distance to No.80 itself, no material overbearing effects are considered to occur. Similarly, whilst there are upper floor windows/openings proposed on the flank elevation facing towards No.80, given the distance and that they would face across the rear car parking area of No.80, no significant material loss of privacy is considered to arise.

In relation to No. 68 Wokingham Road to the north west as above, whilst the proposed building Block A would be deep along this boundary, given the distance to No.68 itself, no material overbearing effects are considered to occur. Similarly, given the distance and position of upper floor windows, no significant material loss of privacy is considered to arise.

No. 1 College Road is located to the rear of the site, for near on the entirety of the rear boundary. There would be a distance of approximately 13m from both buildings to the rear boundary and rear garden of No.1, which at three and four storey at this proximity is considered to be visually overbearing. Furthermore, given the number and position of windows and balconies proposed on the rear elevations at this distance (less than the 20m recommended separation distance under Policy CC8) this is considered to result in both a perception of, and actual, overlooking to this property and its private garden space, as well as to No.3 College Road and to a lesser extent No.5 College Road.

The unacceptable relationships identified above are considered to further demonstrate that the proposals are an overdevelopment of the site. Contrary to Policy CC8.

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.

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 it is considered that all units would be served by adequate outlook and daylighting.

In terms of privacy for future occupiers within the proposed development, given the positioning of windows this is considered to be acceptable. Similarly, given this and the distance between the two buildings, this is considered to be sufficient so as not to result in any unacceptable overbearing effects.

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.."*

Six of the units would be provided with a private balcony and all units would have access to a communal garden area located to the rear of the site. In terms of the communal area, whilst as an area of soft landscaping this would go some way to softening the appearance of the site (at the rear), it is less likely to be an appealing space for relaxing given its siting immediately adjacent the parking and turning area of the applicant site and the parking area of No.80 Wokingham Road immediately to the east. Given the above, combined with the site constraints and proximity to nearby open space (Palmer Park directly opposite) limited amenity space is not considered to warrant a refusal in this instance.

The site is located close to the busy Wokingham Road and a noise assessment has been submitted with the application which has been reviewed by Environmental Protection Officers. The noise assessment submitted shows that the recommended standard for internal noise could be met, if the recommendations from the assessment are incorporated into the design. However, however with windows open the noise levels would be higher than guideline values. The ventilation strategy is yet to be decided although various options are proposed. Should the application have otherwise been supportable, Environmental Protection Officers have recommended conditions to be attached to secure submission and approval of a noise assessment and mitigation scheme prior to commencement of development to ensure an appropriate glazing specification and mechanical ventilation scheme are secured.

An air quality assessment has also been submitted with the application. Environmental Protection Officers are satisfied that this demonstrates that pollutant levels at the new dwellings would be below threshold values such that further assessment or mitigation is not required, and future occupiers would not be subject to poor air quality. Environmental Protection Officers are also satisfied that the air quality assessment demonstrates that the development itself would not detrimentally impact on air quality levels at and surrounding the application site.

A condition would also have been recommended to secure submission and approval of details of the bin storage arrangements for the developments including measures to protect the bins from pests and vermin.

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 is adjacent to the site of an historic gravel put, which has the potential to have caused contaminated land. Should the application have otherwise been supportable, Environmental Protection officers recommend a standard unidentified contaminated land condition (in the event contamination discovered, works to stop and contamination report and remediation scheme to be submitted to LPA).

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 application site is located along A329 Wokingham Road, opposite Palmer Park. The A329 Wokingham Road has parking restrictions preventing on-street parking and forms part of the Red Route 'no stopping' corridor. A westbound bus/cycle/taxi lane is located across the front of the site. The site currently benefits from two dropped kerb accesses onto the Wokingham Road.

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 and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

In accordance with the Parking Standards and Design SPD, the development would be required to provide 1no. on-site parking space per 1-2 bedroom dwelling plus visitor parking at a ratio of 1 space per 10 dwellings. Based on the Council's standards, the proposed development would be required to provide a total of 16 car parking spaces. The Proposed Site Plan shows there would be a total of 14 car parking spaces which is slightly below the Council's adopted standards.

A transport statement has been submitted with the application, which justifies the proposed parking provision stating that the site is located in a highly accessible location by means of public transport or active travel options. In addition, it is stated that the local highway network is subject to a number of waiting restrictions that preclude the ability for vehicles to park on-street without the necessary permits. The Council's Transport Officer considers this to be suitable justification for the proposed parking provision. Given the surrounding road network has extensive parking restrictions in place preventing unauthorised on-street parking it is considered that any overflow in parking would not affect the flow of traffic on the classified road network. As the proposal would generate additional pressure for parking in the area, there should be an assumption that any future occupants of the town houses and flats would not be issued with resident or visitor parking permits. Should the application have otherwise been supportable, this would have been secured by way of condition.

Vehicular access would continue through the existing access located in the centre of the site. The Transport Officer has confirmed that visibility splays would be acceptable. It is proposed to close up the western vehicular access. Any unrequired part of the existing access would need to be reinstated and realigned with the footway. Should the application have otherwise been supportable, this would have been secured by way of condition.

Bin collection is proposed to take place from Wokingham Road, as per the existing arrangement, with a new bin storage area shown adjacent to the highway to enable refuse collectors to obtain access to the bin store area.

All new developments accessed from a classified road would be required to provide a turning area to cater for vehicles that would regularly need to enter the site. The internal layout of the site does make provision for a turning area for a small delivery vehicle at the rear of the site.

In accordance with the Parking Standards and Design SPD, a minimum provision 0.5 cycle storage spaces should be provided per unit. It is indicated that each unit would be provided with one cycle parking space in excess of the requirements of RBC Parking Standards. In principle, this is acceptable but further details would be required to ensure a suitable layout could be achieved. Should the application have otherwise been supportable, this would have been secured by way of condition.

In accordance with Policy TR5, a minimum of 10% of all vehicle parking space within the site should be provided with electric vehicle charging points. Should the application have otherwise been supportable, detailed specification of vehicle charging points and their implementation would have been secured by way of condition.

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. Given that the site is also located within an Air Quality Management Area, is located on a 'treed corridor' (as designated in the Tree Strategy) and is opposite Palmer Park, a significant park and designated 'Local Green Space and Public Open Space', proposals should demonstrate an appropriate level of greening and/or net gain in the tree number.

The site does not contain any existing greenery or vegetation and therefore would not affect any existing trees. Therefore, the proposals represent an opportunity to provide landscaping and tree planting and a net gain in green cover on the site. This is necessary to achieve multiple benefits including visual amenity, ecology, shading, urban cooling, sustainable drainage etc.

A landscape principles statement has been submitted. However, this only indicates that hedging would be provided on the frontage which is insufficient. In view of the requirements of the site, tree planting is required on the frontage as well to enhance visual amenity. Hedge planting in itself is positive. However, as confirmed by the Council's Natural Environment Officer, it would need to be a species that would exceed the height of the proposed front wall so that it could be seen and to aid visual softening of the site. Trees and hedging would also aid pollution filtration.

No other landscape principles other than hedging on the frontage, side and rear are mentioned, which is not sufficient. Furthermore, there is a concern that given the disabled parking space and bin store shown in front of Block B, this removes the potential for the required tree planting due to their proximity to the boundary. As the bin store would be located directly behind the proposed front wall, it would provide a hard elevation on the immediate street frontage which further adds to the concerns about landscaping on the frontage.

As above, the proposal offers the opportunity to provide greenery on the site. However, the limited submissions are not acceptable. As such, the proposals fail to provide sufficient required soft landscaping, contrary to Policies CC7, EN14 and the Tree Strategy.

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.

A Bat Survey report has been submitted with the application. The Council's Ecologist considers that the report has been undertaken to the appropriate standard and agrees with the conclusion of the report that, considering the number of suitable features present, a further survey should be undertaken to confirm whether the building hosts a bat roost.

Given the above there is insufficient information for the Council to determine whether or not protected species would be affected by the proposed development. As such the proposal is contrary to Policy EN12 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.

Sustainability

Policy CC3 (Adaptation to Climate Change) requires that development proposal incorporate sustainable design practices to take account of climate change and Policy CC4 (Decentralised Energy) states that new development of the scale proposed should include provision of on-site decentralised energy provision where feasible/viable or where existing decentralised energy provision is present within the vicinity of the site connect to this network where feasible.

Policy H5 (Standards for New Housing) requires all major category new build housing to achieve the 'zero carbon homes' standard. The policy goes on to set out that as a minimum development should achieve a 35% improvement over the carbon emission rate set out in Building Regulations with a financial contribution to offset any remaining carbon emissions to zero.

The applicant has submitted both a sustainability statement and energy statement with the application. In short, the details proposed in both documents are considered to be acceptable in principle. The scheme incorporates a variety of welcomed features, such as an efficient building fabric (e.g insulated walls and efficient glazing), efficient systems and an array of PV panels are proposed at roof level.

The submitted energy report projects that the development would achieve a 57.84% improvement of carbon emission rate set out in building regulations which complies with the requirements of Policy H5. Should the application have otherwise been supportable, then a s106 obligation would have been required to secure a financial contribution to off-set carbon emissions to zero. However, given the recommendation is to refuse planning permission for other reasons, completion of a s106 legal agreement is not being pursued and lack of such an agreement to off-set carbon emissions to zero would represent a further reason for refusal of the application.

In terms of on-site decentralised energy provision, the submitted energy and sustainability reports explore a range of options and proposes a solar photovoltaic system as a viable option to generate energy. Air source heat pumps and ground source heat pumps have been discounted due to the spatial constraints of the site and the site's foundations.

SuDS

Policy EN18 (Flooding and Drainage) requires all major scheme to incorporate SuDs as appropriate and in line with Government's Technical Guidance. No strategy has been submitted (albeit requested at validation stage). It is noted that the Design and Access Statement does state the following at paragraph 5.39:

Drainage and SuDS: The site is within flood zone 1 and is smaller than 1 hectare. As such, no flood risk assessment is deemed necessary. The proposal will utilise SuDS and this can be secured by condition.

Whilst details of the SuDS proposals could be dealt with by way of condition, the principles must be agreed at application stage. The applicant has failed to do so as part of the application submission and accordingly this forms a reason for refusal.

Employment Skills and Training

In accordance with the adopted Employment Skills and Training SPD (2013) and Policy CC9 (Securing Infrastructure) a development of this nature and scale is required to demonstrate how it would utilise local labour and contribute to skills and training for local labour in the form of a construction phase employment and skills plan associated with the development. Provision of such plan, or equivalent financial contribution, would be secured by way of section 106 legal agreement should it be recommended that planning permission be granted. However, given that planning permission is recommended to be refused for other reasons preparation and signing of a section 106 agreement has not been progressed and therefore this represents a further reason for refusal.

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.

Matters Raised in Representations

All material considerations have been addressed in the above assessment.

Concern has been raised regarding the applicant's history of property maintenance. This is not a material planning consideration and would be civil matter between neighbouring landowners.

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 14 residential units to assist with the Borough housing targets. Other benefits of the scheme include the in-principle sustainability/energy credentials of the proposals. However, there are considered to be a number of significant shortfalls, such as the proposed scale, massing and detailed design deficiencies which results in the proposals being harmful to the character and appearance of the area. In addition, there are significant concerns over the impact on the living accommodation of existing nearby occupiers. Furthermore, the affordable housing, mix and SuDs elements are unproven/not agreed, while the impact on protected species and insufficient landscaping are further shortcomings.

RECOMMENDATION:

REFUSE Planning Permission for the following reasons:

1. The proposed development, due to the relationship between the plot size and overall scale and plot coverage of the buildings, would result in a cramped overdevelopment of the site which fails to accommodate buildings, parking areas and landscaping in a manner which enhances the character and appearance of the area, contrary to Policy CC7 of the Reading Borough Local Plan (2019).
2. The proposed development, due to its incongruent and inappropriate design combined with its excessive overall height, bulk and massing would appear overly dominant within the street scene failing to sit comfortably within the surrounding context. For these reasons the proposed development would harm and fail to enhance the character and appearance of the area, including

Palmer Park, contrary to Policies CC7 (Design and the Public Realm) and EN7Ed (Local Green Space and Open Space - Palmer Park) of the Reading Borough Local Plan (2019).

3. The proposed development, due to its excessive overall scale, height and proximity to No.1 College Road would result in harm to the amenity of this neighbouring property due its visually overbearing appearance, contrary to Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019).

4. The proposed development, due to the combination of its scale, siting, and the number and position of windows and balconies, in close proximity to neighbouring dwellings and private gardens existing to the rear of the site along College Road would result in overlooking and loss of privacy to those dwellings and gardens with consequent harm to the amenity of occupiers. As such the proposals are contrary to Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019).

5. The proposed development fails to demonstrate acceptable provision of tree planting and soft landscaping with consequent harm to visual amenity, air quality, biodiversity and environmental quality of the area, contrary to Policies CC7 (Design and the Public Realm), EN7Ed (Local Green Space and Open Space - Palmer Park), EN15 (Air Quality) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Council (2019) and the Tree Strategy (2021).

6. The applicant has failed to submit sufficient information for the Council to determine whether or not bats (a protected species) would be adversely affected by the proposed development, contrary to Policy EN12 (Biodiversity and The Green Network) of the Reading Borough Local Plan (2019).

7. The proposed development would provide insufficient dwellings of 3 bedrooms or more and as such would fail to adequately contribute towards meeting identified housing needs in the Borough, contrary to Policy H2 (Density and Mix) of the Reading Borough Local Plan (2019).

8. The proposed development, in the absence of an acceptable Sustainable Drainage Strategy, has failed to demonstrate its acceptability in terms of sustainable drainage and attenuating localised flooding, contrary to Policy EN18 of the Reading Borough Local Plan (2019).

9. The proposed development, by reason of its lack of an appropriate contribution towards the provision of Affordable Housing, and in the subsequent absence of a completed legal agreement to secure an appropriate contribution towards the provision of Affordable Housing, fails to make an appropriate contribution to the housing needs of Reading Borough, contrary to Policies H3 (Affordable Housing) and CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019) and the Council's Adopted Affordable Housing Supplementary Planning Document (2021) and Planning Obligations under Section 106 (2015).

10. In the absence of a completed legal agreement to secure an acceptable Employment and Skills Plan (construction phase only; employment and skills plan, or financial contribution), the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm, contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019) and the Employment Skills and Training SPD (2013) and Planning Obligations under Section 106 (2015).

11. In the absence of a completed legal agreement to secure an appropriate financial contribution towards carbon off-setting in the Reading Borough, the proposal would not acceptably adapt to

climate change, achieve zero carbon homes standards and not provide appropriately towards energy infrastructure, contrary to Policies CC3 (Adaptation to Climate Change), CC9 (Securing Infrastructure) and H5 (Standards for New Housing) of the Reading Borough Local Plan (2019) and the Sustainable Design and Construction SPD (2019) and Planning Obligations under S106 SPD (2015).

Informatives:

1. This decision relates to the following plans:

Drawing No: Proposed Site Plan PL-09 Rev 1
Drawing No: Proposed Ground Floor Plan PL-10 Rev 1
Drawing No: Proposed First Floor Plan PL-11 Rev 1
Drawing No: Proposed Second Floor Plan PL-12 Rev 1
Drawing No: Proposed Third Floor Plan PL-13 Rev 1
Drawing No: Proposed Elevations PL-14 Rev 1
Drawing No: Proposed Street Scene PL-15 Rev 1
Drawing No: 3D Images PL-16 Rev 1
Drawing No: Proposed Side Elevations Block A PL-17 Rev 1
Drawing No: Proposed Side Elevations Block B PL-18 Rev 1
Drawing No: Proposed Section Block A PL-19 Rev 1
Drawing No: Proposed Section Block B PL-20 Rev 1
Received 7th January 2022

Drawing No: Location Plan PL-01
Received 19th October 2021

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 reasons for refusal 9, 10 and 11 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.