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**1 Epping Close, Reading, RG1 7YD**

**Demolition of 8 garages and the construction of 2 x 3 bedroom residential units**

**DESIGN AND ACCESS, PLANNING AND SUSTAINABILITY STATEMENT**

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## **1.0 Introduction**

1.1 This Design & Access Statement has been prepared in support of a full planning application advice for the above site. This application follows an initial pre-application enquiry ref: 210516 for three residential units, and a subsequent submission for further pre-application advice ref 220584.

## **2.0 The site and surroundings**

2.1 The site is situated in an existing residential area and conveniently situated close to good public transport and other amenities. The site itself is a small parcel of land occupied by eight garages and sits within a residential site containing a substantial block of flats, dating from the mid twentieth century.

2.2 The application site is occupied by eight garages accessed from Epping Close, which with the hard-standing in front makes up an area of 315 sqm.

2.3 The site lies within the Castle Hill /Russell Street / Oxford Road Conservation Area. The immediate surroundings in the form of the three storey flats provide little positive contribution to the wider conservation area and are at best neutral in their impact. Russell Street to the West of the site is a major public road consisting of two and three storey detached and semi-detached red-brick residential buildings. These buildings make a positive contribution to the character and appearance of the conservation area.

## **3.0 The Development Proposal**

3.1 The proposal involves the demolition of the eight existing garages on the site and the erection of two no. three bedroom residential dwellings, consisting of two storeys each. The gross internal area of the residential unit will be 64.5 sqm at ground floor and 21.5 sq. m at first floor level, totalling 86 sq. m. and so in excess of the minimum

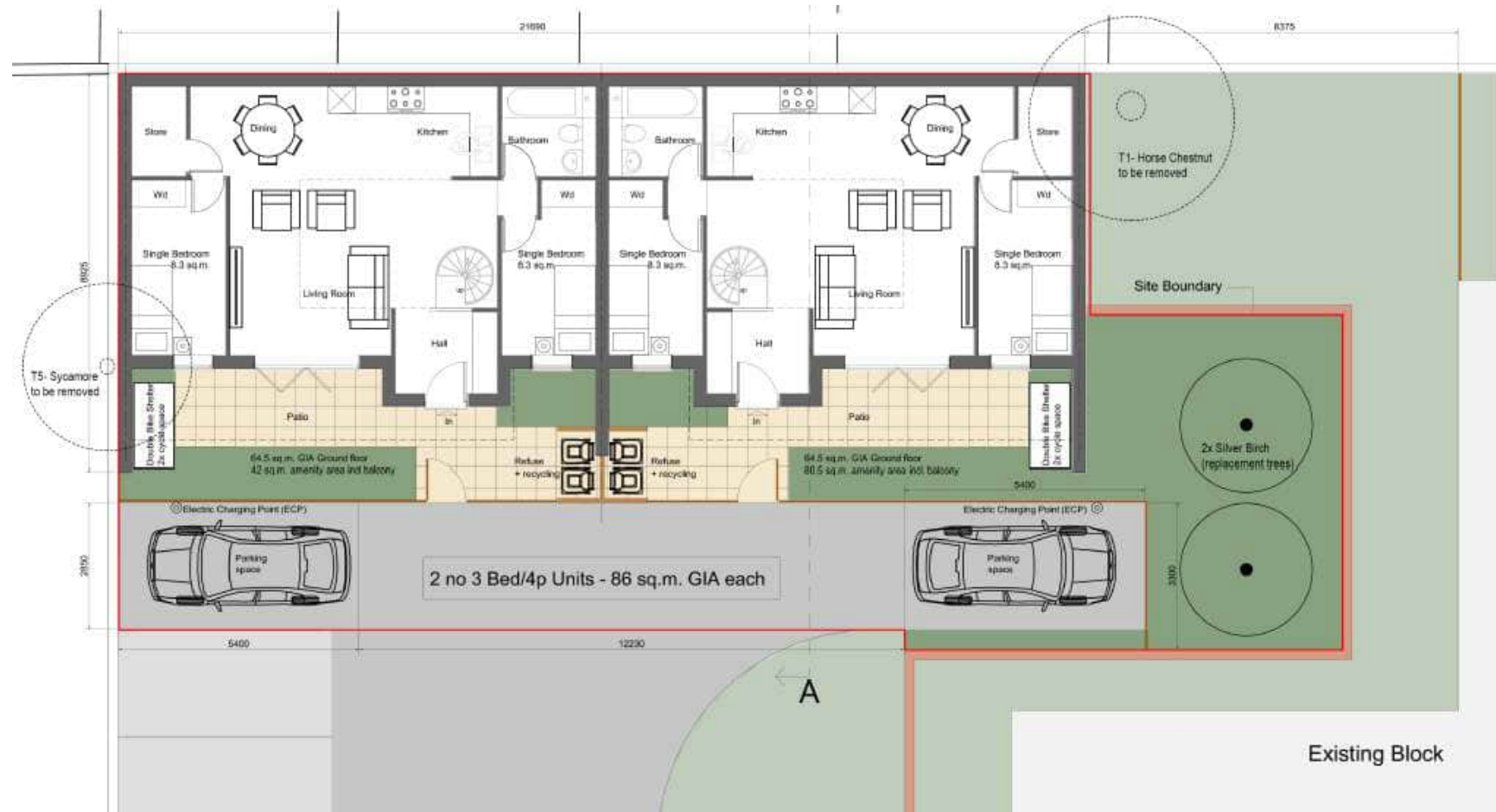
national standard of 84 sq. m as stated in the Technical Housing Standards for 3b/4p 2 storey dwellings. These units therefore represent acceptable living conditions.

3.2 The initial proposal ref 210516 was for a two storey block of three units with a pitched roof. The council advised that an approved but un-built residential development to the rear of the site at 57 Baker Street (Ref: 180624/FUL) would be adversely affected by a development of this scale backing on to the common boundary. In the light of this the proposal has been reduced in scale with a shallow pitched roof to the first floor angled away from the unbuilt proposal to the rear. We include a daylighting and sunlight study with our submission, which concludes that the proposal to the rear will not be adversely affected by this new proposal.

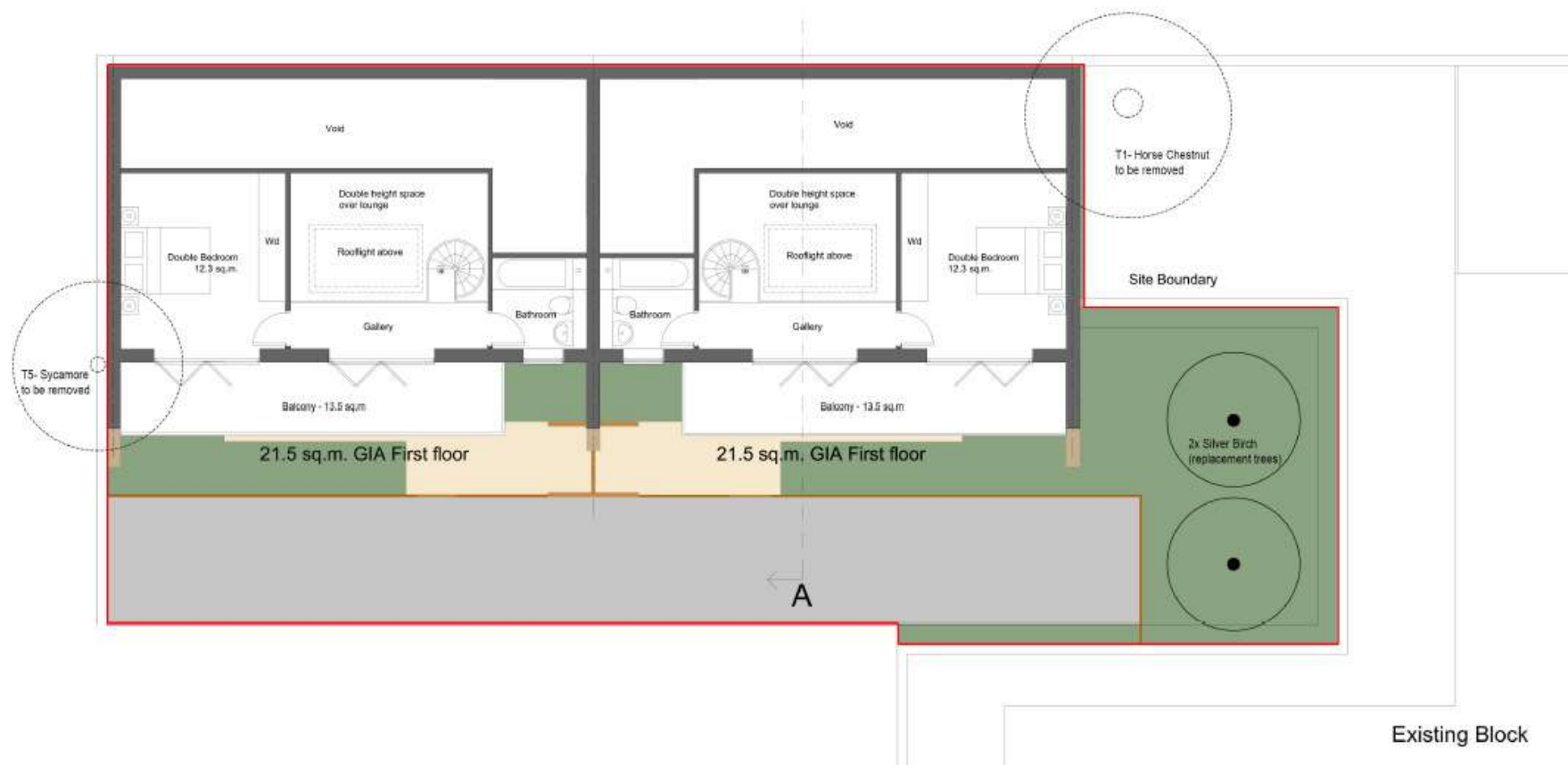
3.3 The ground floor of the units consists of the principal living area with kitchen, dining and two single bedrooms with a family bathroom. The main living space will be double-height, with a rooflight above to provide maximum daylight penetration. There will be a double bedroom and bathroom at the upper level, accessed from a spiral staircase, with internal walkway and balcony. A private external balcony of 13.5 sq. m. is accessed from this level via opening bi-fold doors, and directly overlooks the small courtyard garden below. The angled dividing party wall between the 2 units and to each side give added privacy to the balconies. There will be no direct overlooking of the balconies or into the habitable rooms from the existing residential block, as can be seen from the relevant aerial photographs.

3.4 Externally the courtyard gardens provide further private amenity space and include both refuse and recycling vessels situated behind the front boundary, each with space for 2 cycle stands where shown. The applicants have confirmed that residents will also have full use of the communal grounds around the existing block of flats.

3.6 The floor and roof plans are illustrated below.



**GROUND FLOOR PLAN**



**FIRST FLOOR PLAN**



## ROOF PLAN

3.5 The external materials will be a light yellow/ buff facing brick on three sides to the boundaries, as once built these walls will require no maintenance. The front facing elevation will be clad with vertical stained cedar boarding

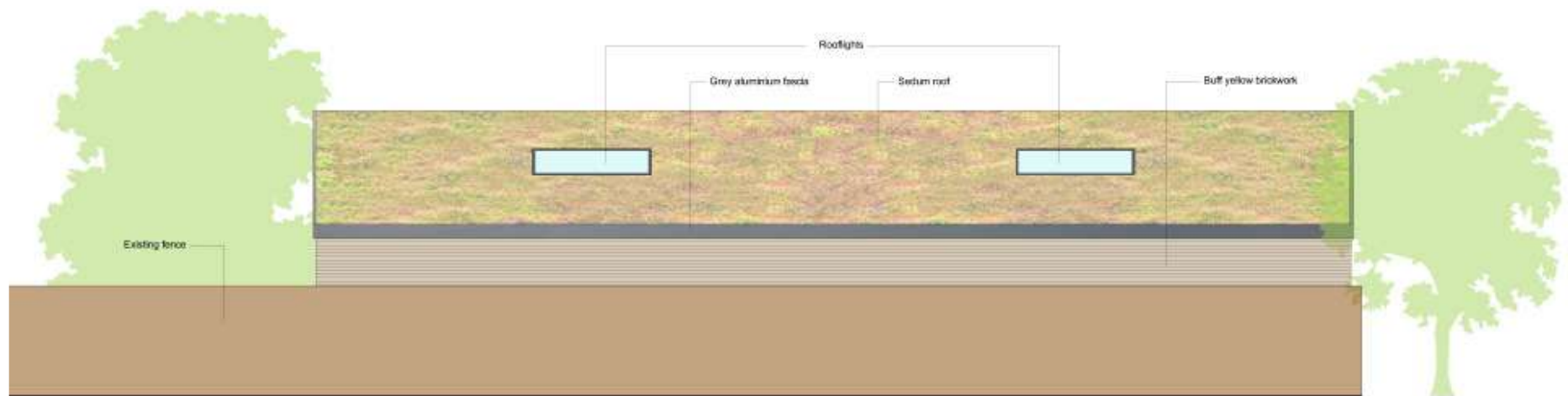
above a white rendered finish to ground floor. The aluminium glazing will be polyester powder coated in a complimentary anthracite grey. The shallow angled roof covering will be sedum which will face the site behind. There will be a full width roof overhang over the main south facing areas of glazing, and the first-floor balcony will provide further shading to the ground floor glazing. The proposed materials are illustrated on drawing PL-109.

3.6 The site occupies an area of 315 sqm with the proposed building footprint covering a gross area of 150 sqm.

3.7 Below are the front, rear and side elevations, plus a cross section illustrating the shallow pitched roof.



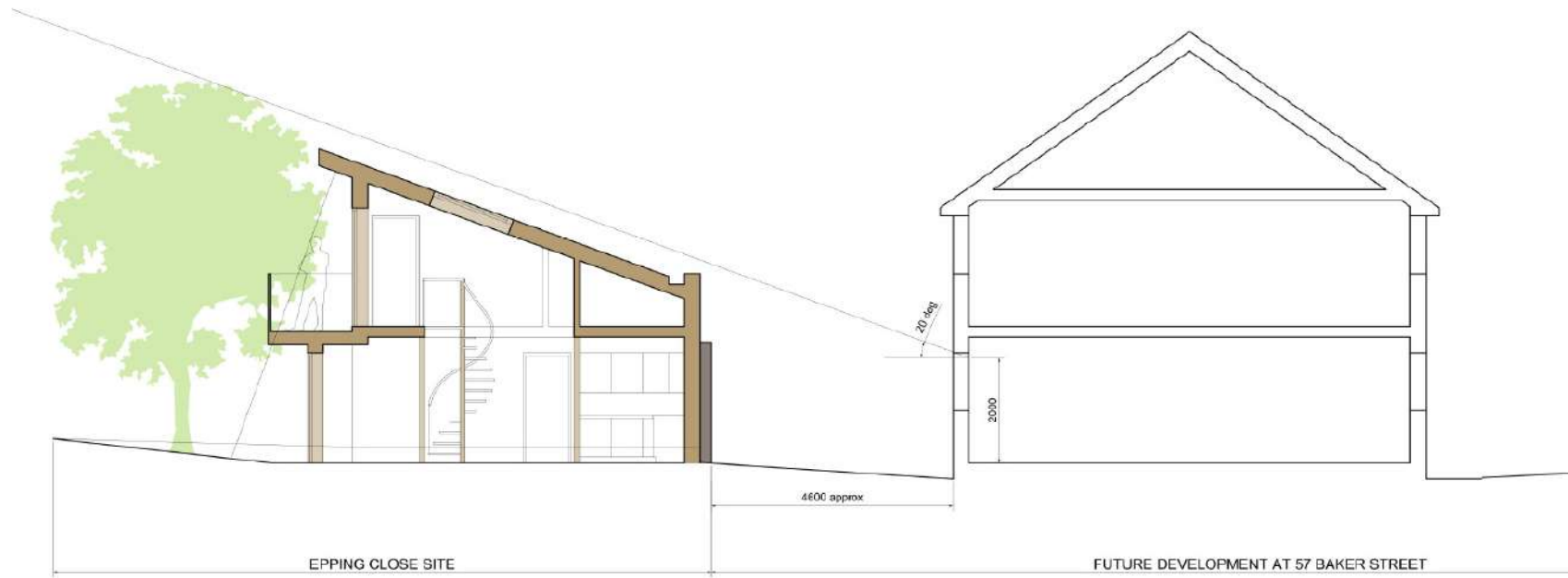
**PROPOSED FRONT ELEVATION**



**PROPOSED REAR ELEVATION**



**PROPOSED SIDE ELEVATION (FOURTH ELEVATION WILL BE A MIRROR IMAGE)**



**PROPOSED CROSS SECTION**

## **4.0 Analysis**

This proposal is being made mindful of local, regional and national planning policies, which are the Reading Core Strategy 2015, Reading Borough Local Plan 2019, Supplementary planning documents, and The National Planning Policy Framework (NPPF).

### 4.1 Impact upon 57 Baker Street development

In the first proposal reference 210516 the council were concerned about the impact of the proposal on the approved development to the rear. As a result, the proposal has been redesigned so that there will be no detrimental impact in terms of daylighting and overshadowing should that development ever be built. This is confirmed in the Daylight and Sunlight report by Messrs. Lumina Limited, which concludes that the resulting development at the rear will still meet BRE recommended standards, which is the benchmark requirement.

### 4.2 Impact upon the character and appearance of the conservation area

The proposal is a high-quality contemporary design, which will make a positive contribution to the conservation area. The redesigned proposal eradicates the previous blank rear elevation and has a more modest scale than before. It consists of two modest family dwellings, which will replace eight poor quality garages that do not comply with modern standards, and which make a negative contribution to the conservation area. The proposal is on a site of suitable size which makes efficient use of land with good access and transport accessibility.

#### 4.3 Living conditions for future residents.

The council were previously concerned that there would be unacceptable overlooking from the existing residential block. The aerial photographs in Appendix 1 show that there will be no direct overlooking into the two units so there will be no loss of privacy.

While the garden area is in view from some windows in the block, this is no different to the outlook into communal amenity areas around the block. The outlook from the proposal itself is away from the existing block and not towards any of its windows.

The property is in accord with policy H5 Standards for new housing.

#### 4.4 Amenity of proposed development

The two properties have external amenity areas of 42 sq. m and 82 sq. m. In addition, they will have access to, and full use of the communal gardens to the rear which is circa 1,170 sq. m, as calculated from the Ordnance Survey plan. Therefore, the amount of available amenity space is satisfactory. The council actively encourage family units, which are often in the form of flatted developments, where amenity space is usually shared, so this is no different to that scenario.

#### 4.5 Transportation

The site is outside the central zone and is well served by public transport. The proposal provides one parking space per unit in accordance with the adopted Parking Standards and Design SPD.

While the site currently has eight garages situated on it, these garages do not conform to current dimensional requirements. They each measure 2.4m wide x 4.85m long internally and were constructed when cars were

generally smaller. Current UK dimensional requirements are 3m wide x 6m long internally. In the previous pre-app, the council requested additional information and clarification regarding the garages as follows:

- 1. Identification of who the garages are currently owned by.*
- 2. Are they utilised by local residents/adjacent neighbouring properties?*
- 3. The present take up/usage of the garages - whether they are being used for vehicle parking and or storage.*

We confirm that the garages and the site identified in red are owned by Aralbridge Ltd, the Applicants. We have also been advised by letting agents that the garages are rented by local residents, (but not necessarily residents of Epping Close) and are let on 12 month leases which roll over. They are used for storage as they are too small for modern cars. Many councils have similar arrangements for garages in their ownership where any resident in the borough can rent them as 'lock-ups'. With regard to cars being parked in front of the garages, note that this is on an ad-hoc basis, and residents could be excluded from doing so as the site is not within the freehold of the existing development. We have calculated that there are 18 car parking spaces on the remaining site, see below:



Two cycle parking spaces are provided for each dwelling and one new car parking space per unit, (each measure 2.85m x 5.4m) in accordance with the adopted Parking SPD.

#### 4.6 Natural environment Trees

In their pre-application advice, the council noted that adjacent trees are likely to be impacted by the development, a point we note. This full planning application is accompanied by an arboricultural impacts assessment, including mitigation measures for any trees that are affected or lost. We would request that a SuDS assessment be a made a condition of any consent.

#### 4.7 Ecology and Biodiversity

In the councils pre-application advice note they stated:-

***'The garages are unlikely to be suitable for use by roosting bats and the proposals are unlikely to adversely affect protected species or priority habitats.***

***There would therefore be no objections to this application on ecological grounds.'***

In this application consideration has been given to wildlife friendly landscaping. The proposal includes a sedum roof which will face the site to the rear. Insects love Sedum, all varieties. The main species of insects that survive so well on Sedum are the Bees and Butterflies. This in turn attracts the birds and other wildlife.



In their most recent pre-application advice, the council stated:

***'The applicant would need to demonstrate how the development will result in a "net gain" in biodiversity units as measured using the DEFRA 3 Metric'.***

We have consulted Environmental consultants AA Environmental Ltd about the council's requirement. They have advised us that the DEFRA Small Sites Metric is applicable to a site of this nature and size, not the DEFRA 3 Metric, so we have included this document with the application. We have added a swift box and bat box to each of the side/flank elevations so overall there will be a net gain in biodiversity.

#### 4.8 Sustainability

Policy H5 of the Reading Borough Local requires proposals to be designed and constructed to meet the improved dwelling emissions rate, and water efficiency standards.

There are many ways to be sustainable and energy efficient in construction, and several technologies available, in order to reduce carbon emissions and a building's carbon footprint:

- Insulated the building above minimum Building Regulations Standards, is not a major on-cost.
- Use of low energy lighting throughout, minimum requirements are 75% under the building regulations.
- Building orientation to maximise natural daylighting, here the scheme is south facing and able to utilize.
- Passive Solar Design - Designing in solar shading/control and use of thermal mass, will be implemented here.
  - o Use of Air Source Heat pumps (ASHP), now ever more relevant with increasing energy costs and an alternative to gas.
- Use of underfloor heating for even heat distribution.
- Use of PV Cells & Solar panels, here not efficient with a north facing roof.
- Use of Mains Ventilation Heat Recovery (MVHR) will provide fresh air throughout the year.
- Reducing water consumption through specifying appropriate brassware
- Rainwater Harvesting. Here the use of sedum on the roof may exclude this.
- Grey Water Recycling.

The proposals can utilise many of the above methods and technologies, but only those that are cost efficient with a reasonable pay-back period.

The development will be accessible in line with M4(2) of the Building Regulations.

#### 4.9 Environmental protection

The contractor will comply in all respects with current legislation, for instance '***The Control of Noise (Code of Practice for Construction and Open Sites) (England) Order 2015***'

The contractor will comply with the Code of Practice - Control of Pollution and Noise from Demolition and Construction Sites 2008 as attached in Appendix III.

The Applicant will accept the councils' proposed conditions: 1. Control of noise and dust during construction; 2. Construction and demolition hours of work, 3. No bonfires.

## **5.0 Conclusion**

5.1 This design proposal seeks to make efficient use of a previously developed brownfield site, consisting of eight undersized garages.

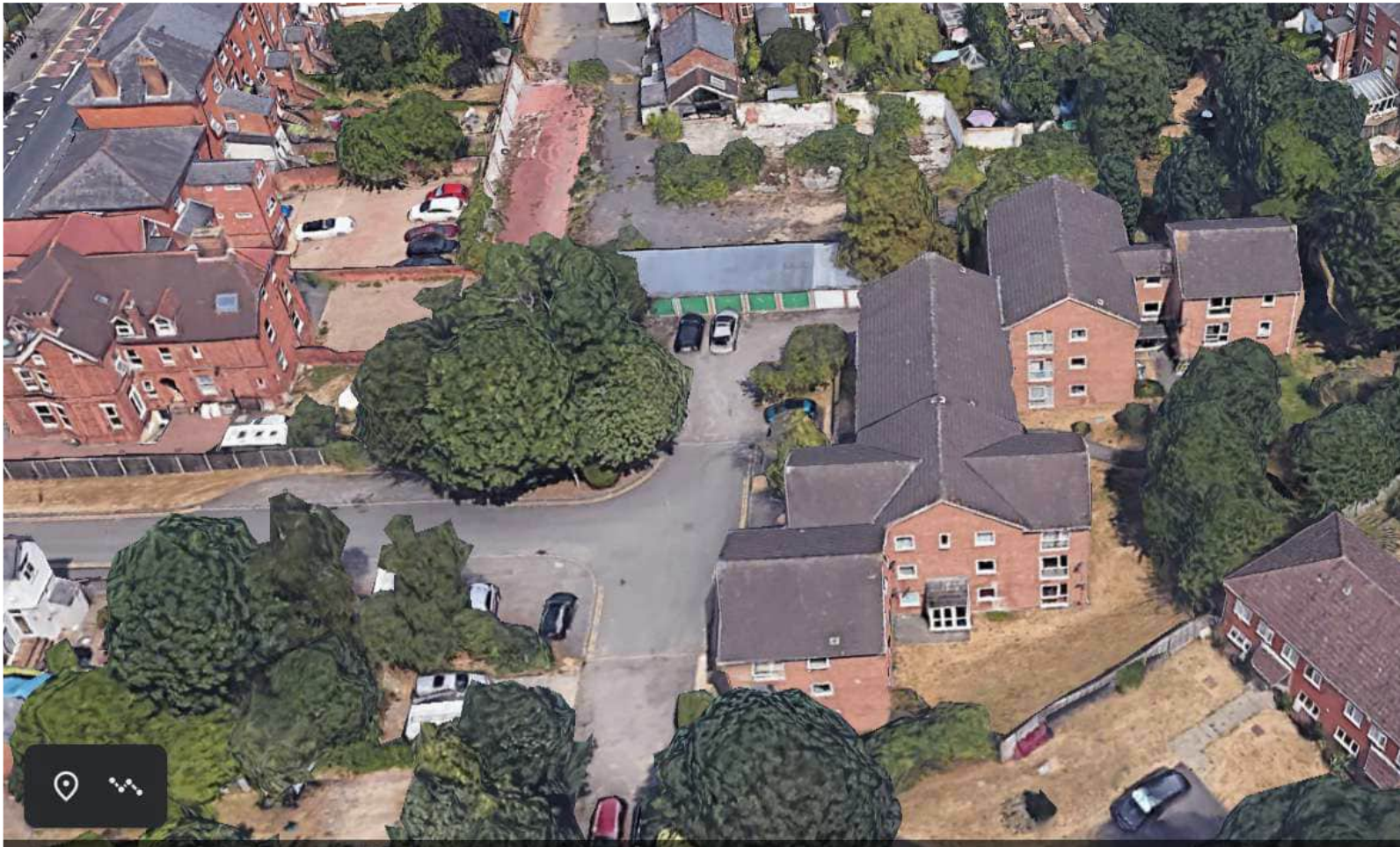
5.2 The contemporary design and external materials are of a high quality and befitting of the setting in the Conservation Area. As such the resulting development would enhance the character and appearance of the Conservation Area.

5.4 The location is a sustainable one, close to Reading town centre, and has good public transport and road links.

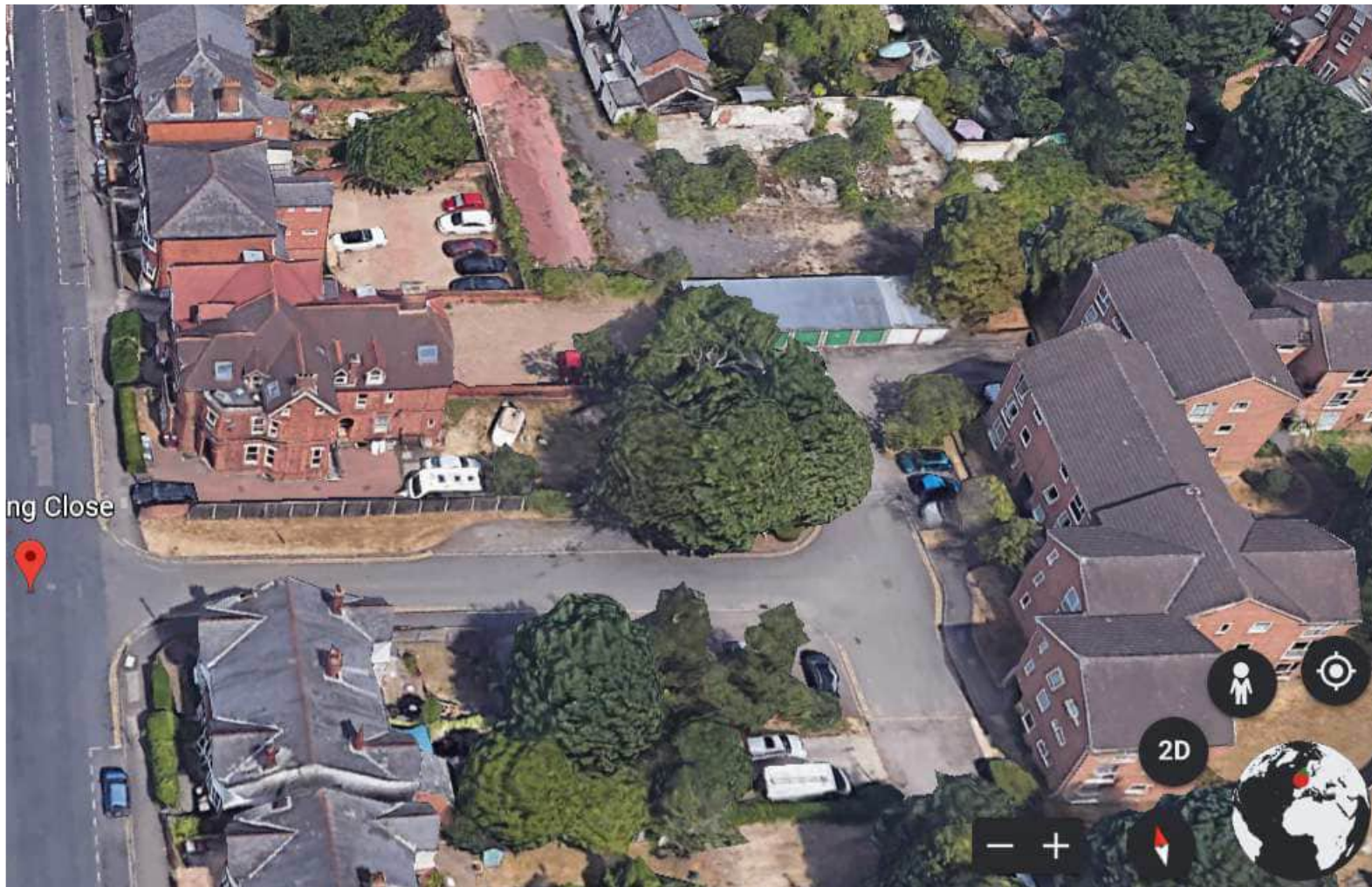
5.5. We would urge the council to support the proposal and make a positive recommendation to approve the development proposal.

## Appendix 1 – Site photographs

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1. Aerial view from the South



2. Aerial view from the South West



3. Aerial view from the West



4. Aerial view from the South East



5. Aerial view from the East



6. Photo showing the boundary wall on East side.



7. Photo showing North-East corner of the site.



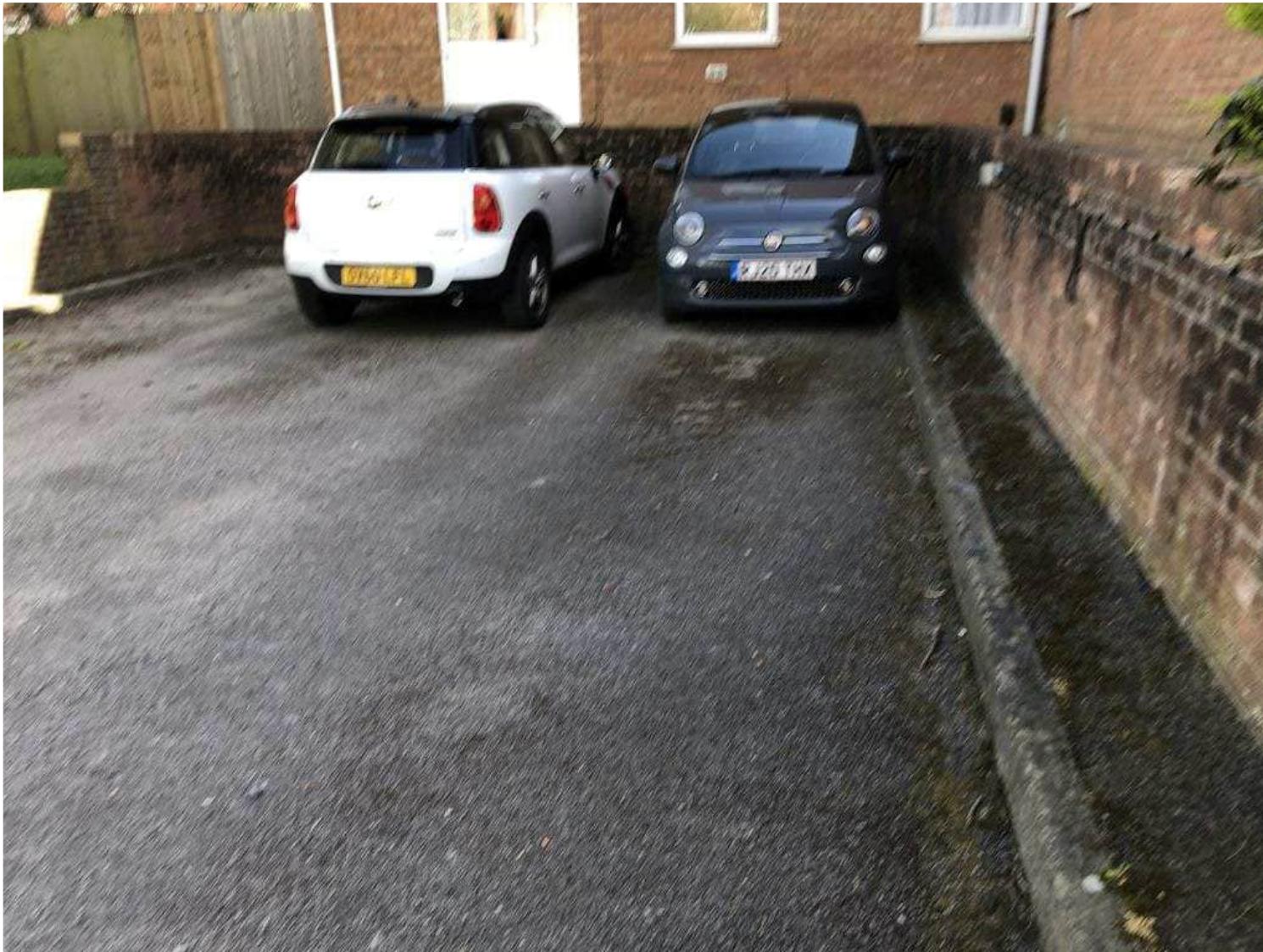
8. Photo showing existing garages.



9. Photo showing existing garages.



10. Photo showing existing garages.



11. Photo showing parking area on West side.



12. Photo showing existing tree to be removed.



13. Photo showing East side of the site.



14. Photo showing a tree growing in adjacent property that is damaging the boundary wall. Future (additional) conflict with the adjacent wall can be forecast. Canopy oversails the existing garages.



14. Photo showing North-East side.

## **Appendix II – Council’s Pre-application advice**

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Mr A Neil  
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Our Ref: 220584

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10 November 2022

Your contact is: Ms Claire Ringwood, Planning

Dear Mr Neil,

## PRE PLANNING APPLICATION ENQUIRY RESPONSE

**Enquiry Reference:** 220584

**Address:** Rear Of, 1-16 Epping Close, Reading, RG1 7YD

**Proposal:** Pre-application advice for the demolition of 8 garages and construction of 2 x 3 bedroom residential units

Further to your pre-application request received on 20<sup>th</sup> April 2022 here is my advice in relation to your proposal. Apologies for the delay in responding.

### 1. THE SITE & PROPOSAL

The site is a block of 8 garages located to the northern boundary of Epping Close. The site is located in the Russell Street/Castle Hill Conservation Area and the site slopes downwards towards the north.

The pre-application enquiry relates to the demolition of the existing garages and the construction of 2 x 3 bedroom houses with parking and bin storage.

### 2. SUPPORTING INFORMATION SUBMITTED WITH THE PRE-APPLICATION

The following information was submitted on 20<sup>th</sup> April 2022:

Drawing No: PL-101 - Location and Block Plans

Drawing No: PL-102 - Existing Site Plan

Drawing No: PL-103 - Proposed Site Plan and Ground Floor Footprint

Drawing No: PL-104 - Proposed First Floor Footprint

Drawing No: PL-105 - Proposed Elevations Sheet 1

Drawing No: PL-106 - Proposed Roof Plan

Drawing No: PL-107 - Proposed Elevations Sheet 2 - showing future development to the rear

Drawing No: PL-108 - Proposed Cross Section AA - showing future development to rear

Drawing No: PL-109 - Proposed Materials - Mood Drawing

Design and Access, Planning and Sustainability Statement

Daylight and Sunlight Report

### **3. RELEVANT PLANNING HISTORY**

221563/FUL - Proposed demolition of 8 garages and construction of 2 x 3 bedroom residential units. Waiting validation.

210516/PREAPP - Pre-application advice for the demolition of 8 garages and the construction of 3 x 2 bedroom residential units. Observations sent 15/07/2021.

180624/FUL - Erection of two 2/3 storey buildings to provide 9 (2x2-bed and 7x3-bed) residential units (Class C3), 9 parking spaces, landscaping and associated works (adjacent site at 57 Baker Street).

### **4. CONSULTATIONS**

#### **Transport:**

The applicant has stated that the garages do not conform to current dimensional requirements. They each measure 2.4m wide x 4.85m long internally and were constructed when cars were generally smaller. The garages are rented out on 12 month leases for storage and are rented by local residents, (but not necessarily residents of Epping Close). It is stated that any cars parking in front of the garages is on an ad-hoc basis and residents could be excluded from doing so as the site is not within the freehold of the existing development. In principle, this is acceptable but any evidence regarding the tenants addresses is requested (excluding any personal information) if a full application is forthcoming.

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. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per unit which has been illustrated on the proposed site plan. The parking areas should be constructed in permeable materials so not to increase the surface water run-off from the site.

The development site is located in an area designated as a Residents Parking Permit Area; Zone 08R. Under the Borough's current parking standards, this proposal may generate additional pressure for parking in the area. Therefore, there should be an assumption that any future occupants of the proposed dwellings will not be issued with resident parking or visitor permits which would be covered by condition and an informative applied. This will ensure that the development does not harm the existing amenities of the neighbouring

residential properties by adding to the already high level of on street car parking in the area.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 2 cycle parking spaces for each C3 dwelling which must be provided within a lockable store/shed.

The Council's Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point.

The applicant should ensure that the refuse storage provisions comply with the Council's Waste Management Guidance which is available to view online.

### **Natural Environment Trees:**

As you are aware, the site was subject to a pre-application last year (ref 210516). The only thing that seems to have changed is that green roofs are now indicated - this is clearly positive but doesn't address the matter of potential tree impact.

The site is within a conservation area, the AQMA and within a low canopy cover ward hence a site where tree retention and planting is a high priority. The impact on trees and adequate levels of greening needs to be incorporated.

It appears when comparing aerial photos (and St view) with the Proposed Site plan that trees are likely to be negatively impacted and/or lost:



As per the advice given last year, any future planning application should be accompanied by a tree survey and arboricultural impact assessment. Good quality trees should be retained and where lost, mitigation planting should be incorporated. Developments should result in a net gain in tree numbers but it is difficult to see how this could be achieved given the constrained nature of the site and the proposals taking up the whole site. On such sites, alternative greening should be considered such as green walls and/or roofs to compensate, as are indicated. Loss of overall greenery on this site will not be acceptable given the Council's climate change mitigation aims and the aims of our Tree Strategy - all supported by policy. In terms of the Council's carbon zero aims, green walls and roofs aid thermal efficiency of a building hence reduce energy usage in heating and cooling so contribute to reduced carbon aims.

The applicant should also carefully consider their drainage / water use / SuDs plans given the requirement of policies CC2 & CC3 along with Reading Climate Emergency Strategy. Every development should aim to reduce water use, runoff and reduce grey water output.

### **Ecology:**

The garages are unlikely to be suitable for use by roosting bats and the proposals are unlikely to adversely affect protected species or priority habitats.

There would therefore be no objections to this application on ecological grounds.

### Scheme design and Biodiversity enhancements

Paragraph 174 of the NPPF reads “Planning policies and decisions should contribute to and enhance the natural and local environment”.

Paragraph 180 of the NPPF reads

*“opportunities to incorporate biodiversity in and around developments should be encouraged by [...] minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

*[...]*

*development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.“*

The applicant would need to demonstrate how the development will result in a “net gain” in biodiversity units as measured using the DEFRA 3 Metric.

With this in mind the applicant should design the development from the outset so that its value for wildlife is maximised, for example by providing green roofs, integral bird and bat boxes (including swift boxes), wildlife friendly landscaping including mixed native hedges and new tree planting. Full details should be provided with the planning application.

### **Environmental Protection:**

Standing advice states that applicants should submit a statement detailing how noise and dust will be effectively managed during demolition (if relevant) and construction and who will be responsible for this. We recommend the following conditions: 1. control of noise and dust during construction; 2. construction and demolition hours of work, 3. No bonfires.

## **5. RELEVANT PLANNING POLICY AND GUIDANCE**

The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (July 2021)

#### Reading Borough Local Plan (Nov 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)  
EN1 (Protection and Enhancement of the Historic Environment)  
EN3 (Enhancement of Conservation Areas)  
EN14 (Trees, Hedges and Woodland)  
EN15 (Air Quality)  
EN16 (Pollution and Water Resources)  
H1 (Provision of Housing)  
H2 (Location, Accessibility, Density and Housing Mix)  
H3 (Affordable Housing)  
H5 (Standards for New Housing)  
H10 (Private and Communal Outdoor Space)  
H11 (Development of Private Residential Gardens)  
TR3 (Access, Traffic and Highway-Related Matters)  
TR5 (Car and Cycle Parking and Electric Vehicle Charging)

#### Supplementary planning documents/guidance

Sustainable Design & Construction SPD (Dec 2019)  
Revised Parking Standards and Design SPD (Oct 2011)  
Planning Obligations under Section 106 (2015)  
Affordable Housing SPD (2021)  
Tree Strategy (March 2021)

## **6. APPRAISAL**

### **Main considerations:**

- A. Impact on the approved development at 57 Baker Street
- B. Impact on the character and appearance of the area and the Conservation Area
- C. Living conditions of future residents and neighbouring properties
- D. Amenity of proposed dwelling
- E. Transport implications
- F. Natural Environment
- G. Sustainability
- H. Other considerations

### **A. Impact on the approved development at 57 Baker Street**

It is noted that the previous pre-application enquiry raised concerns with regards to the impact of the proposed development on an extant permission at 57 Baker Street. The planning

permission for residential development at 57 Baker Street expired on the 6<sup>th</sup> February 2022 and although conditions were discharged the submitted Design and Access, Planning and Sustainability Statement suggests this permission has not been commenced. Notwithstanding this, a Daylight and Sunlight Report has been submitted and the proposed scheme designed with the impacts on this development in mind. Although the Daylight and Sunlight Report concludes that *‘four of the gardens serving the yet-to-be-built houses under planning consent 180624 on the adjoining land at 57 Baker Street will experience an increase in overshadowing but all four of those gardens will already be below the BRE recommendations for Overshadowing in any event....In overall conclusion, although there will be some reduction in daylight, as those reductions will all be well within the BRE recommendations they will be such that the impact on the amenity enjoyed by existing neighbouring residential dwellings will not be material.’*

Epping Close is at a higher level than 57 Baker Street and there would only be a distance of approximately 4.6m back-to-back with the proposed dwellings and the residential properties at 57 Baker Street. It is acknowledged that the design of the scheme has been amended and the eaves level at the rear is significantly lower than at the front however, notwithstanding this or the findings of the Daylight and Sunlight Report, the close proximity of the proposed scheme and the development at Baker Street is not considered acceptable. There still remains a concern in regards to the impact on the living environment of the future residents of these properties in terms of harm to outlook, overshadowing (which as stated in the Daylight and Sunlight Report would already be poor and this will be exacerbated by the proposed development), visual dominance and overbearing effects of the development and as such the proposal would be contrary to Policy CC8 (Safeguarding Amenity).

However, as the permission at 57 Baker Street has now expired the impact of the proposal on this expired permission is unlikely to be relevant should a future planning application be submitted, unless it comes to light that the permission has been implemented in some way. Notwithstanding this, the proposal has also been assessed against other material considerations as detailed below.

## **B. Impact on the character and appearance of the area and the Conservation Area**

Policy H11 of the Reading Borough Local Plan applies stringent criteria for development proposals on private residential gardens (than those on brownfield sites) and requires that:

- a) They make 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 an unacceptable 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.

Policy H2 of the Reading Borough Local Plans states that residential development will be informed by:

- The character and mix of uses of the area in which it is located;
- Its current and future level of accessibility by walking, cycling and public transport;
- The need to achieve high quality design;
- The need to maximise the efficiency of land use; and
- The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

Policy CC7 states that *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*.

Policy EN1 states *“historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced”*. Policy EN3 states *“the special interest, character and architecture of Conservation Areas will be conserved and enhanced.....development must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas”*.

The proposed elevations suggest modern materials and a contemporary design and the Council are not opposed to such schemes in their own right however, the existing flats at Epping Close have little architectural merit and due to the constrained nature of the site it is not clear how the proposed dwellings make a positive contribution to the area and the conservation area. It is acknowledged that consideration has been given to the proposed scheme due to the constraints of the site i.e. it is of a more modest scale than previously submitted and is lower in height at the rear and the removal of the garages would be positive (although they are subservient and much smaller in scale) however, the proposed dwellings still have very little amenity space and still have blank façades at the rear due to the constraints of the site not allowing for this. These are clear indicators of the constraints on the site. Although the proposed design is interesting, the properties would be uncharacteristic with the established pattern and character of the immediate vicinity and the proposal still appears cramped on the plot. As such the proposal is considered contrary to all the policies noted above.

The proposal provides three bedrooms which is in accordance with Policy H2 which requires, where possible, the provision of family homes of three or more bedrooms. Although the proposal provides three bedrooms the layout does not invite family living, particularly where small children are involved, as the single bedrooms are located on the ground floor with the living/kitchen and dining room and the double bedroom on the first floor. In combination with the lack of amenity space it is unlikely that they are suitable for a family which would be contrary to Policy H2.

### **C. Living conditions of future residents and neighbouring properties**

Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan states that development will not cause a detrimental impact on the living environment of existing

residential properties or unacceptable living conditions for new residential properties, in terms of:

- 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;
- Crime and safety; or
- Wind

Policy H11 states that proposals for new residential development should not cause a significant detrimental impact to the amenity of adjacent and nearby occupants.

With regards to the impact of the proposal on the flats at Epping Close and also the impact of the existing development on the proposed houses. The existing building at Epping Close is staggered and it is not shown on the submitted plans. However, it is noted that there are windows to the existing block(s) that would face the proposed scheme. There remains a concern that the proposal could be harmful to both the existing flats and proposed houses in terms of harm to outlook, loss of privacy and overlooking (including from the balconies) and possibly visual dominance and overbearing on the proposed houses.

Policy H5 (Standards for New Housing) requires new build housing to comply with the nationally-described space standard and a 3 bed / 4 person dwelling would be required to be a minimum of 84sqm. The proposed dwellings are 86sqm and the bedrooms meet the required sizes which are in accordance with policy.

#### **D. Amenity of proposed dwelling**

Policy H10 (Private and Communal Outdoor Space) sets out that *‘Dwellings will be provided with functional private or communal open space....The design of outdoor areas will respect the size and character of other similar spaces in the vicinity’*.

Due to the constraints of the site the proposed scheme provides a very small front garden area and a balcony. This is contrary to policy H11 which requires “a site of adequate size and dimensions to accommodate the development in terms of the setting and spacing around buildings; amenity space, landscaping and space for access roads and parking.” The lack of amenity space does not compare favourably with those in the vicinity and as such the proposal would not be in accordance with policy H10 which states that outdoor areas will respect the size and character of other similar spaces within the vicinity. It is noted that the Design and Access, Planning and Sustainability Statement in paragraph 3.5 states *‘the applicants have confirmed that residents will also have full use of the communal grounds around the existing block of flats.’* Although the use of the communal garden area is a

benefit to the site it does not remove the need for on-site amenity space as required under Policy H10 of the Reading Borough Local Plan.

#### **E. Transport implications**

Transport have advised that in principle the loss of the garages are acceptable but evidence regarding the tenants addresses is requested (excluding any personal information) if a full planning application is submitted. One parking space per dwelling is acceptable but there should be an assumption that future occupiers will not be issued residents parking or visitor permits. Cycle storage needs to be provided and an electric charging point for each proposed dwelling.

#### **F. Natural Environment**

The site is within an AQMA and a conservation area and is within a low canopy cover ward hence a site where tree retention and planting is a high priority. The green roof as indicated is positive but it is likely that trees will be negatively impacted or lost. It is noted in the Design and Access, Planning and Sustainability Statement that a full arboricultural impact assessment including mitigation measures for any trees that are affected or lost will be submitted along with a SuDs assessment.

Developments should result in a net gain in tree numbers but it is difficult to see how this could be achieved given the constrained nature of the site and the limited amenity space available.

Any future planning application would also need to demonstrate how the development will result in a 'net gain' in biodiversity. Providing the green roof is welcome but other examples such as integral bird and bat boxes (including swift boxes), wildlife friendly landscaping including mixed native hedges and new tree planting will need to be proposed.

#### **G. Sustainability**

The proposed development, as per policy H5 of the Reading Borough Local Plan would be required to be designed and constructed to meet the improved dwelling emissions rate, and water efficiency standards. The development would also be required to be accessible in line with M4(2) of the Building Regulations (unless built in line with M4(3)).

#### **H. Other considerations**

##### **CIL**

The development would be liable to the Community Infrastructure Levy regime that is applicable to all decisions for planning applications made from the 01/04/2015. The details are available on the Council's website <http://beta.reading.gov.uk/readingldf>.

### Affordable housing

Policy H3 (Affordable Housing) of the Reading Borough Local Plan would apply to the current proposal, as the scheme would not be one of the two specific exceptions to the policy. The proposal would result in two additional dwellings. As such the proposal would be liable for affordable housing. The applicant would be required to provide a minimum of 2 independent valuations for the proposed development to calculate the appropriate contribution in this instance.

Should the applicant contend that the development would not be viable with the above contribution, a viability assessment would be required to evidence this, which would be subject to review by the Council's Valuations team during the course of the application (there would be a separate fee - see our pre-application guidance for the fees). Please see the validation requirements for more details about the type and nature of information required at application stage regarding affordable housing / viability - all such information would be required in advance of the validation of any application at the site.

## **7. CONCLUSION**

It is noted that a full planning application has been submitted which is currently pending validation (application ref: 220584). This will be subject to further consultation and assessment by the planning officer allocated this application. However, in respect of the current pre-application enquiry, although some concerns previously raised may have been addressed i.e. if the development at Baker Street has expired (although it is not clear whether this development has been implemented in anyway) other concerns remain. The proposed development by reason of its location and size still appears cramped on the plot. The proposal is also considered harmful to existing and future residents at Epping Close and the proposed houses and would not provide adequate outdoor amenity space and as such it would be uncharacteristic with the established pattern and character of the immediate vicinity and would not enhance the character of the conservation area. For the reasons set out above it is unlikely that an application would be supported.

## **8. TYPE OF APPLICATION AND TIMESCALE**

The target timescale for determining an application as proposed will normally be 8 weeks. If the applicant is Reading Borough Council the application will be required to go to Planning Applications Committee. Please be advised that delays to applications can arise when there are affordable housing/viability issues.

## **9. ADVICE ON SUPPORTING INFORMATION REQUIRED FOR A PLANNING APPLICATION**

The Council's Planning Applications Validation Checklist can be found by clicking on the following link: [PLANNING APPLICATION VALIDATION CHECKLIST \(reading.gov.uk\)](https://www.reading.gov.uk/planning-applications-validation-checklist)

This advice is given on a without-prejudice basis and in good faith and will not over-ride the formal consideration of a planning application by the Council.

Please note that the advice contained within this letter, or attached report, is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council in the event of a formal application for planning permission.

Yours sincerely

*SDV*

*PP*

Ms Claire Ringwood  
Planning Officer

**Appendix III - Code of Practice - Control of Pollution and Noise from Demolition and Construction Sites 2008**

CONTROL OF

# Pollution & Noise from Demolition & Construction Sites

Demolition

Noise

Construction

Pollution

MAY 2008

**CODE OF PRACTICE**





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## **PART 1 INTRODUCTION**

### **1. Background**

- 1.1** There is a need to ensure that residents and businesses are protected from environmental disturbance during the construction of both major and smaller developments.
- 1.2** This Code of Practice has been prepared to help developers and their contractors ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities.
- 1.3** This document has been prepared by the Environmental Health Departments of the London Boroughs of Bromley, Croydon, Lewisham, Merton, Sutton and Wandsworth, who have long experience dealing with environmental problems arising from demolition and construction sites. The Code of Practice is the policy of these authorities' Environmental Health Departments and will be attached to relevant planning approvals and building control applications and circulated to contractors working in the respective boroughs.
- 1.4** Noise and environmental nuisance can also be controlled through the prior consent principle under the Control of Pollution Act 1974 Section 61 and also through the Environmental Protection Act 1990 Section 80.
- 1.5** A local authority may serve a legal notice imposing noise requirements (including vibration) as to the way in which the works are to be carried out. The person served with a notice is guilty of an offence under the relevant Act if, without reasonable excuse, any requirement of the notice is contravened.
- 1.6** Adherence to this Code will demonstrate a positive attitude and commitment towards minimising environmental disturbance to local residents.
- 1.7** The contractor should always comply with the provisions of:-
  - The Control of Pollution Act 1974 Part IV
  - The Health & Safety at Work Act 1974
  - The Clean Air Act 1993
  - The Environmental Protection Act 1990
- 1.8** Developers and their contractors should also have regard to the London Best Practice Guidance entitled "The control of dust and emissions from construction and demolition". This guidance evaluates sites as Low, Medium and High risk sites and is of particular significance to development sites that are greater than 1,000 square metres in area and where the development consists of more than ten properties. This document is available via your Council Environmental Health Department or directly from the Greater London Authority ([www.london.gov.uk](http://www.london.gov.uk)) or London Councils ([www.londoncouncils.gov.uk/](http://www.londoncouncils.gov.uk/)).

## 2. Purpose of Code

- 2.1** The purpose of this Code of Practice is to ensure that disturbances due to noise, vibration, dust and smoke arising from demolition and construction works on all building sites, including the Public Highway, are kept to an acceptable level without the imposition of unnecessary or unduly onerous restrictions on contractors.
- 2.2** The Code is also intended to provide guidance to contractors in circumstances where there is not a need to implement the formal procedure detailed in Sections 60 and 61 of the Control of Pollution Act 1974. It is not intended to supersede any other published guidance.
- 2.3** The term “construction works” in this Code applies to site activities, preparation, demolition, excavation, tunnelling works, building operations, structural alteration and maintenance and transportation of materials and spoil to or from the site. Contact your borough Environmental Health Department for advice on their requirements for the demolition of buildings (see list of contacts in Appendix 2).
- 2.4** Although all contractors are expected to adopt the full provisions of the Code, it may not be appropriate to apply all the provisions to some smaller developments. However, all developers should comply with the spirit of the Code.
- 2.5** If contractors seek to vary the provisions of the Code, this must be done in consultation with the local Environmental Health Department prior to implementation. Details of the procedure are included within the Code.

## 3. General

- 3.1** The contractor will be held responsible for ensuring that all plant and equipment, including any which may be on hire, is well maintained, properly silenced and used in accordance with the manufacturers instructions and BS 5228.
- 3.2** The effectiveness of all measures included in this Code shall be monitored frequently by the main contractor, reviewed at least weekly, and may be subject to inspection by Officers from the Environmental Health Department.

# Control of **Pollution & Noise from Demolition & Construction Sites**

## 4. Protection of The Public and Buildings

- 4.1** The contractor should ensure that measures are taken to:
- (i) Protect residents, users of buildings close by and passers by from nuisance or harm and
  - (ii) Protect buildings from physical damage caused by vibration.
- 4.2** Contractors should be aware that the Health and Safety Executive are responsible for enforcing safety legislation on demolition and construction sites. For advice contact the Health and Safety Executive (see list of contacts in Appendix 2).
- 4.3** Contractors should be aware that Building Control officers are responsible for enforcing safety legislation in relation to dangerous structures. They operate a 24 hour service and if called to a site to investigate, remove and or make good what may be considered to be a danger to the public e.g. unsafe hoardings, and the owner of the site will be responsible for the payment of costs in relation to the service. For advice phone your local Building Control section (see list of contacts in Appendix 2).

## 5. Hours of Work

- 5.1** Where residential occupiers are likely to be affected by noise, the hours of noisy works shall normally be restricted to:-
- |                          |                             |
|--------------------------|-----------------------------|
| Monday – Friday          | 8.00 a.m. - 6.00 p.m.       |
| Saturday                 | 8.00 a.m. - 1.00 p.m.       |
| Sunday and Bank Holidays | No noisy activities on site |
- 5.2** However you must check with your local authority as there may be additional conditions set e.g. planning conditions specifying hours of work.
- 5.3** Instructions should be given to ensure that vehicles and plant arriving at and leaving the site comply with the stated hours of work. (See 5.1).

## 6. Publicity

- 6.1** Prior to any works starting, the contractor shall inform occupiers of all properties which may be affected by noise, dust or vibration arising from construction works of the nature of the works, proposed hours of work and their expected duration. In particular, it is recommended that a notice be placed in a conspicuous position, informing them of the agreed hours of work.
- 6.2** In all instances publicity should include the name and telephone number of a main contact within the contractor's organisation who is able to give further information and deal with any complaints or emergencies that may arise at any time.

## 7. Variation from Normal Working Hours

- 7.1** It is recognised that there may be circumstances where the restriction on hours of work in 5.1 cannot be adhered to. In these circumstances the contractor will be required to justify fully any proposed deviation from this Code of Practice and provide written justification to the local authority before any works start outside normal hours.
- 7.2** Provided the contractor has been able to justify the case to the local authority, works may be allowed to proceed in accordance with appropriate alternative conditions.
- 7.3** The local authority will confirm all agreed variations in writing to the contractor.
- 7.4** In any instance where it is necessary or desirable to deviate from this Code of Practice the contractor should be able to demonstrate that all reasonable steps have been taken to minimise disturbance from the works. Where appropriate, consideration shall be given to:
- (i) Screening to reduce noise levels.
  - (ii) The offering of temporary accommodation to residents likely to experience severe and prolonged disturbance.
  - (iii) Publicised “rest periods” during which noisy operations are temporarily ceased.
  - (iv) The provision of public refuges away from severe noisy works.
- 7.5** Prior agreement for works involving any deviation from this Code of Practice should be sought from your local authority, preferably at least 3 days prior to the works commencing, on form A in this document (see Appendix 1).
- 7.6** In the absence of prior agreement for noisy works, the Council may serve a notice under Section 60 of the Control of Pollution Act 1974 to prohibit or restrict works in accordance with this Code of Practice.
- 7.7** In exceptional circumstances, where works being carried out on the Public Highway would cause severe disruption to traffic, permission to work outside the hours stated in 5.1 may be given by the Highways Engineer/Transportation Group in conjunction with the Environmental Health Department (see list of contacts in Appendix 2).

## **PART 2 NOISE AND VIBRATION**

### **8. Plant and Equipment**

- 8.1** Noisy plant or equipment shall be situated as far as possible from noise sensitive buildings. Barriers (e.g. site huts, acoustic sheds or partitions) to reduce noise reaching noise sensitive buildings shall be employed where practicable. Old buildings around the site perimeter waiting to be demolished can provide effective noise screening.
- 8.2** The following provisions should be adhered to wherever practicable:-
- (i) Vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order and operated in such a manner as to minimise noise emissions. The contractor shall ensure that all plant complies with the relevant statutory requirements.
  - (ii) Machines in intermittent use should be shut down or throttled down to a minimum when not in use.
  - (iii) Compressors should be fitted with properly lined and sealed acoustic covers which should be kept closed whenever in use. Pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers.
  - (iv) Equipment which breaks concrete, brickwork or masonry by bending or bursting or "nibbling" shall be used in preference to percussive tools where practicable. Avoid the use of impact tools where the site is close to occupied premises.
  - (v) Where practicable, rotary drills and bursters activated by hydraulic, chemical or electrical power shall be used for excavating hard or extrusive material.
  - (vi) Where practicable, equipment powered by mains electricity shall be used in preference to equipment powered by internal combustion engine or locally generated electricity.
  - (vii) Neither any part of the works nor any maintenance of plant shall be carried out in such a manner as to cause unnecessary noise or vibration except in the case of an emergency when the work is absolutely necessary for the saving of life or property or the safety of the works.
  - (viii) Plant shall be maintained in good working order so that extraneous noise from mechanical vibration, creaking and squeaking is kept to a minimum.
  - (ix) Noise emitting machinery which is required to run continuously shall be housed in a suitable acoustically lined enclosure wherever practicable.

- 8.3** Care should be taken to reduce noise when loading or unloading vehicles or dismantling scaffolding or moving materials etc.

## **9. Piling**

- 9.1** The noise sensitivity of the area should be considered when determining the method of piling to be used. Building Control and the Environmental Health Departments should be consulted on the chosen method.
- 9.2** Sheet piling should, wherever practicable, be carried out using hydraulically operated or vibratory hammers.
- 9.3** The use of conventional impact hammers should, wherever possible, be avoided. Where practicable, jacked piles shall be used in preference to piles driven using other methods. Any pile driving shall be carried out by plant equipped with a recognised noise reducing system.
- 9.4** Where surface contamination is present on site, appropriate piling techniques should be adopted. (See also Section 13).
- 9.5** In some circumstances the Environmental Health Department may limit the hours of piling further than those quoted in 5.1.

## **10. Sandblasting**

- 10.1** The work area will be close sheeted to reduce dust nuisance from grit. Routine checking is required to ensure that the sheeting remains sound or sealed during the operation. Particular attention shall also be given to the working platform to ensure that it is properly sheeted or sealed to contain dust.
- 10.2** Non siliceous grit will be used to avoid long term irreversible lung damage from silica dust.
- 10.3** Proper protection will be provided for any structure painted with lead based paint.
- 10.4** In cases where water is used for large scale cleaning and blasting the requirements of the Environment Agency should be followed.

## **PART 3 DUST AND AIR POLLUTION AND SOIL CONTAMINATION**

### **11. Dust and Air Pollution**

- 11.1** Burning of materials on site shall not be permitted.
- 11.2** The London Best Practice Guide provides detailed methods to mitigate emissions of dust and other pollutants. Emphasis should be placed on the following to minimise the risk of air pollution:-
- (i) Using processes which do not generate hazardous fumes and hazardous dust
  - (ii) Ensuring that airborne hazards do not escape from the site to affect members of the public and surrounding environment.
- 11.3** Dust pollution will be minimised during demolition by the complete screening, if practicable, of the building or structure to be demolished with debris screens or sheets. Old buildings around the site perimeter waiting to be demolished can provide effective air pollution screening.
- 11.4** The watering down of the area should be carried out where necessary to minimise dust transfer into neighbouring premises. Wheel wash facilities should be provided on larger sites. Contact your Environmental Health Department for their requirements (see list of contacts in Appendix 2).
- 11.5** Stockpiles of earth shall be damped down or otherwise suitably treated to prevent the emission of dust from the site. Stockpiles should be planned and sited to minimise the potential for dust generation. The handling of spoil should be kept to a minimum and when materials are deposited onto a stockpile it should be from the minimum possible height.
- 11.6** The contractor shall ensure that the area around the site, including the public highway, is regularly and adequately swept to prevent any accumulation of dust and dirt.
- 11.7** Skips and removal vehicles shall be properly covered when leaving the site. Spoil should be handled in such a way so that it does not give rise to excessive dust. Watering of rubble chutes shall be undertaken where necessary to prevent dust emission.
- 11.8** The contractor should take all necessary precautions to prevent smoke emissions or fumes from plant or stored fuel oils from drifting into residential areas. In particular, measures should be taken to ensure that all plant is well maintained and not left running for long periods when not in use.

- 11.9** General advice can be obtained from the “Control of dust from construction and demolition activities”, February 2003 published by the Building Research Establishment (see list of contacts in Appendix 2).

## **12. Asbestos**

- 12.1** The contractor shall consult with the Health and Safety Executive when removing asbestos materials (see list of contacts in Appendix 2).

## **13. Contaminated Land**

- 13.1** The contractor shall consult with the Environment Agency and the Environmental Health Department when dealing with any contaminated soil or contaminated groundwater on the site.
- 13.2** Certain contaminants may affect construction materials and advice should be sought at an early stage. Contact Building Control and the Environmental Health Departments for further advice (see list of contacts in Appendix 2).

## **14. Crushing Machines**

- 14.1** Any plant used for the crushing of materials should be issued with a Permit by a Local Authority under the Pollution Prevention and Control Regulations 2000. All work should be carried out in accordance with the conditions of the Permit. Where plant is used to recycle materials, the appropriate licence from the Environment Agency shall be obtained. The process operator should notify the local authority in whose area the process is proposed prior to operation.

## **15. Monitoring**

- 15.1** The developer and contractor should conduct a regular air monitoring programme where there is evidence of volatile or airborne hazardous materials or there is a risk of fumes or dust affecting the local area and take any necessary corrective action. They should also contact the Environmental Health Department (see list of contacts in Appendix 2) for advice, further information and any additional requirements.

## **PART 4 DRAINAGE FOLLOWING DEMOLITION OF BUILDINGS**

### **16. Drainage**

- 16.1** Following the demolition of a building the disused drains must be “sealed off” at the junction with the sewer under the public road. Generally the local authority will not allow you to re-use old drainage systems for new buildings. However in certain cases this may be permitted subject to a satisfactory closed circuit television (CCTV) survey.
- 16.2** The Environmental Health Department may require you to provide a CCTV survey and may itself be able to provide a CCTV service. Additional services may be available such as carrying out a drain seal off service by remote control without the unnecessary expense and disruption of digging up the public road. These services are chargeable.
- 16.3** For further details on these or other technical services available please contact your local authority (see list of contacts in Appendix 2).

# Appendix 1

## Form A

### **LONDON BOROUGH OF ..... ENVIRONMENTAL HEALTH DEPARTMENT**

Application for works not conforming with the **“Control of Pollution and Noise from Demolition and Construction sites” Code of Practice.**

When completed please send and/or fax to the relevant Environmental Health Department (see list of contacts in Appendix 2), together with any supporting documents

Applicant .....

Registered Office:.....

Telephone..... Mobile.....

Fax..... Email .....

Contact Name/s.....

.....

Address for correspondence (if different from above)

.....

.....

Telephone..... Mobile .....

Fax..... Email .....

Contact Name/s.....

.....

Location of works.....

.....

Control of

Pollution & Noise from  
Demolition & Construction Sites

Proposed start date.....

Estimated duration of works.....

Proposed hours of work – (where not in accordance with Code of Practice)  
.....  
.....

Full details of proposed works – Please give full details of plant and machinery to be used and any other proposed deviations from the Code of Practice  
.....  
.....

Reasons for not adhering to Code of Practice.....  
.....  
.....

Details of advance publicity, consultation and measures taken/proposed to minimise noise, dust and pollution  
.....  
.....

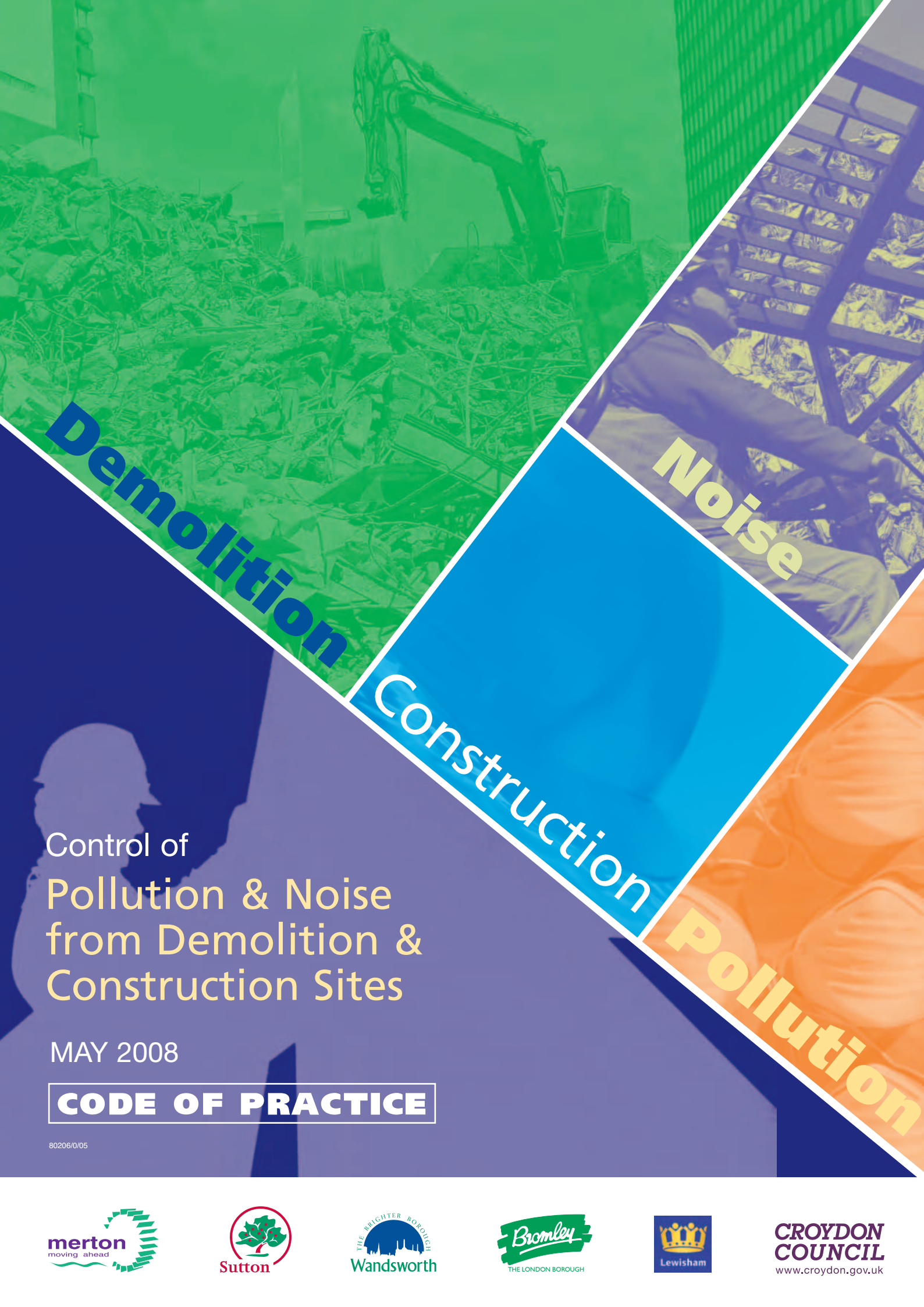
Signed..... Date.....

Designation.....

For use by Environmental Health Department

Comments:  
.....  
.....  
.....  
.....  
.....  
.....

Signed ..... Date .....



Demolition

Noise

Construction

Pollution

Control of  
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80206/0/05