

DELEGATED APPLICATION REPORT

Ward: Battle (boundary with Norcot ward is Wilson Road)

App Ref: 220121/FUL

Address: "Land to the Rear of", 12-14 Wantage Road, Reading, RG30 2SE

Proposals: Erection of 2 x 2-bed semi-detached dwellings to the rear of No's 12 & 14 Wantage Road (fronting Wilson Road) and associated works, following demolition of existing structures.

Case Officer: Mr Jonathan Markwell

Applicant: Mr and Mrs Cane

Date received (valid from): 4 February 2022 **Target Decision date:** Originally 1 April 2022, but an extension of time was subsequently agreed until 27 April 2022.

1. INTRODUCTION

- 1.1 The application site comprises part of the rear amenity spaces of No's 12 and 14 Wantage Road, fronting onto Wilson Road. As existing there are garages/structures associated with the Wantage Road buildings (double garage at No. 12 and single garage at No. 14) and part of the rear amenity spaces (hardstanding) within the red line boundary plan submitted. This plan indicates that the applicant owns No. 14 Wantage Road, with a blue line specified around the property and remainder of the rear garden not forming part of the application site.



Site location plan and view of the application site looking north-east.



The rear of No's 12 and 14 Wantage Road, from Wilson Road (taken 02/03/2021)

- 1.2 The site falls within an Article 4 Direction Area (including properties 4-34 Wantage Road) for patterned brickwork. It is also within an Air Quality Management Area.



View of the existing single garage structure at No. 14 Wantage Rd & hardstanding

- 1.3 Wilson Road is a one-way road going north to south. The surrounding area is characterised by a mixture of two-storey semi-detached and predominantly terraced dwellings situated towards the front of plots. This part of Wilson Road includes some shallow plots, although this is generally not characteristic of the wider area. The west side of Wilson Road at this point is a traditional terrace, while the east side is typically the garages/parking/gardens associated with the properties fronting onto Wantage Road. There have been some redevelopments (and unimplemented permissions) of such land on the east side of the road, such as: 3 no. units at former the Elgee Plastics site (rear of Grovelands Church), 3 no. terraced houses at no 13. Wilson Road; and 5 no. terraced houses at 19-23 Wilson Road. Please see the relevant history section below for details.



Wilson Road as existing (taken on 02/03/2021)



Aerial view of the application site looking east (from Google Maps) showing an additional structure in the rear garden of No. 14, subsequent demolished on the basis of the unaccompanied officer site visit on 02/03/2021.

2. PROPOSAL AND SUPPORTING INFORMATION

- 2.1 The proposal seeks full planning permission for the erection of 2 x 2-bed semi-detached dwellings to the rear of No's 12 & 14 Wantage Road (fronting Wilson Road) and associated works, following demolition of existing garage structures. The associated works include boundary treatments, front parking areas (1 off-street space per dwelling), EV charging points, bike and bin stores. As a result of the proposed works the size of the rear amenity spaces to No's 12 and 14 Wantage Road would decrease, with a significant proportion of the area being utilised for the proposed development.
- 2.2 This application was submitted as effectively being a re-submission of application 201388 (validated on 12/01/2022, but withdrawn on 04/02/2022 as it transpired that the applicant had inadvertently made the application on the wrong application site - land to the rear of 14 & 16 Wantage Road). The local planning authority applied flexibility in allowing a separate application submission to be made - this application - utilising the fee previously paid for application 201388, despite it relating to a different application site.
- 2.3 Discussions/correspondence was entered into with the agent of the applicant prior to the determination of this application. Given the somewhat unusual context of this application being a fresh replacement application for a recently validated/withdrawn separate application (as referenced in the previous paragraph), there was some overlap in discussions / requirements for more information. A summary of the significant correspondence with the agent is detailed below:
- a) 26/01/2022 - application submitted.
 - b) 27/01/2022 - email from case officer (CO) to agent (A) requesting the submission of a Design and Access Statement and clarifying various matters to enable validation of the application (description of development, floorspace inconsistencies). In addition, request for matters previously raised in relation to application 201388 on 14/01/2022 (viability evidence, elevation plans showing the proposed boundary treatment, section plans, existing and proposed streetscene, Policy H5 statement, Policy H10 & H11 statement, parking/transport information) to be provided by 03/02/2022, as equally applicable to this application.
 - c) 04/02/2022 - email from A to CO providing information to enable validation of application.
 - d) 08/02/2022 - email from CO to A feeding in transport observations for comment and requesting update on submission of information previously requested on 14/01/2022 and referenced on 27/01/2022. Email forwarded to colleagues of the A, following receipt of out-of-office reply until 15/02/2022
 - e) 09/02/2022 - email from colleague of A advising to expect updates during the week of 21/02/2022.
 - f) 23/02/2022 - email from CO to A seeking the following updates
 - a. information within my email of 14th January - the deadline of 3rd February has already passed for this to be submitted, but it is still awaited and outstanding;
 - b. b) floorspace inconsistencies, as per my email of 27th January;
 - c. c) typo within the DAS still referencing No's 14-16, as per my email of 4th February;
 - d. d) photographic evidence of site notice being erected - see email of 4th February and separate correspondence from planning administration;
 - e. d) responses to transport comments, as per my email of 8th February.And feeding in ecology observations for comment.
 - g) 28/02/2022 - email from CO to A seeking a response to previous email of 23/02/2022 and setting a deadline of 11/03/2022 for all information to be submitted. Also advised of third party comments.
 - h) 28/02/2022 - email from A to CO advising of sickness, but intention to provide response on 01 or 02/03/2022.

- i) 05/03/2022 - email from A to CO providing amended and additional plans, DAS, CIL form and responses to emails from CO dated 08, 23 & 28/02/2022.
- j) 10/03/2022 - email reply from CO to A with responses to comments by the A on 05/03/2022 and providing the A with an opportunity to submit further information by 18/03/2022.
- k) 11/03/2022 - email from CO to A, feeding in further transport comments on the basis of information provided by the A on 05/03/2022. Request for responses by 18/03/2022.
- l) 23/03/2022 - Email from CO to A advising, in the absence of any reply from the A, that the application would be refused by 1/4/22 if not withdrawn by 28/3/22. Email forwarded onto colleagues of A after receiving automated out of office reply until 29/03/22.
- m) 23/03/2022 - Reply from colleague of A requesting extension of time for the determination of the application until 20/04/2022
- n) 24/03/2022 - email correspondence between CO and colleague of A to agree extension of time until 27/04/2022.
- o) 20/04/2022 - Holding email from A advising that response to outstanding matters is in the process of being carried out.
- p) 26/04/2022 - Email from CO to A seeking clarity of the exact date by which the outstanding information would be submitted.
- q) 28/04/2022 - Reply from A advising viability report likely to be submitted next week.
- r) 29/04/2022 - Email from CO to A advising that CO will await to hear from A next week with a full and complete reply on all outstanding matters.
- s) 03/05/2022 - Reply from A asking for extension of time on application.
- t) 17/05/2022 - Email from CO to A seeking an update and exact date by which all outstanding information will be submitted, owing to lack of reply from A.
- u) 18/05/2022 - Email from A relaying delays from consultant and would prefer to send all information in a single instance.
- v) 24/05/2022 - CO blind copied into email from A to consultant seeking update on viability report.
- w) 4/7/2022 - Email from CO to A advising, in the absence of a reply from A, that the application will be refused by 08/07/2022 should it not be withdrawn by 06/07/2022. No response received.

2.4 Plans and information considered:

20099.S.PP-36 Location Plan, as received 26/01/2022

20099.S.PP-50 Existing Floor Plan, as received 26/01/2022

19130PP-31 Existing Elevations, as received 26/01/2022

20099.S.PP-38 Rev A Existing Floor Plan, as received 05/03/2022

20099.S.PP-37 Rev A Block Plan, as received 05/03/2022

20099.S.PP-32 Proposed Ground Floor Plan, as received 26/01/2022

20099.S.PP-33 Rev A Proposed First Floor Plan, as received 05/03/2022

20099.S.PP-34 Proposed Roof Plan, as received 26/01/2022

20099.S.PP-35 Rev A Proposed Elevations, as received 05/03/2022

20099.S.PP-39 Proposed Floor Plan Areas, as received 26/01/2022

20099.S.PP-40 Proposed Section, as received 05/03/2022

20099.S.PP-41 Proposed Street Scene Showing Wilson Road East Elevation, as received 05/03/2022

Design & Access Statement by HAC Designs Ltd, dated 25/10/2020, as received 05/03/2022

CIL form 1, as received 05/03/2022

Email from HAC Designs 'RE: Land to the Rear of 12-14 Wantage Road, Reading - 220121', dated 05/03/2022

- 2.5 Had the proposals been able to be supported by officers, the scheme would have been liable to a Community Infrastructure Levy (CIL) payment. Based purely on the floorspace information provided by the applicant on the amended CIL form submitted on 05/03/2022 (the methodology of which may or may not be agreed by the Council - this would be verified separately from the planning application submission process), this would have amounted to £18,936.28 (floorspace specified as 121.2sqm x the 2022 CIL rate of £156.24 per sqm of accommodation).

3. RELEVANT PLANNING HISTORY

Application site only:

- 3.1 None.

No. 12 Wantage Road:

- 3.2 None.

No. 14 Wantage Road:

- 3.3 None.

Other relevant nearby sites:

Land to the rear of 14 & 16 Wantage Road

- 3.4 201338/FUL - Erection of 2 x 2-bed semi-detached dwellings to the rear of No's 14 & 16 Wantage Road (fronting Wilson Road) and associated works, following demolition of existing structures. Withdrawn 04/02/2022.

R/O 8 Wantage Road

- 3.5 950575 - Erection of a two storey dwelling and the erection of a garage with vehicular access to the rear of 4, 6 & 8 Wantage Rd. Refused 14/12/1995.

- 3.6 960593 - Construction of a 2 storey dwelling and rear car parking; retention of vehicular access to the rear of 4, 6 and 8 Wantage Road. Outline permission granted 15/04/1997.

- 3.7 970028 - Construction of 2 storey dwelling and car parking; retention of vehicular access to rear of 4, 6 & 8 Wantage Rd. Reserved matters granted 04/08/1997.

Rear of 24-26 Wantage Road

- 3.8 161760/FUL - Construction of 2 semi-detached houses at the rear of 24-26 Wantage Road with access from Wilson Road. Permitted 26/09/2018.

- 3.9 191239/VAR - Application for removal or variation of condition 2 following grant of planning permission. (Application no 161760). Permitted 29/10/2019.

- 3.10 220032/FUL - Construction of 2 semi-detached houses at the rear of 24-26 Wantage Road with access from Wilson Road. Council notified of appeal under non-determination - no start date letter for the progression of the appeal has yet been received. Council would have refused planning permission had appeal not been lodged.

1 Wilson Road (The Old Dairy)

- 3.11 00/00594/FUL (991294) - Change of use from existing dairy shop (A1) to 4 x residential flats incorporating first floor side extension and provision of basement accommodation. Approved 13/09/2000.

The planning officers committee report states the application property 'has the external appearance of a residential property with garages to the rear but is in fact offices on the ground floor with a flat above and storage to the rear.....there is no recent relevant planning history on this site, most of the work to the premises having taken place in the 1950's.'

Former Elgee Plastics, 1a Wilson Road

- 3.12 160180/FUL - Demolition of existing commercial premises and erection of 3 No. 2-bedroom terraced houses (Use Class C3) (amended description) - Approved 17/1/2017.

5 Wilson Road (land adjacent)

- 3.13 191775/FUL - Erection of a 2 bedroom house with off road parking - Refused 10/6/2020.
- 3.14 201307/FUL - Erection of a 2 bedroom house - Refused 09/08/2021.
- 3.15 211950/FUL - Erection of a 2 bedroom house. Refused 29/03/2022.

13 Wilson Road

- 3.16 07/01455/FUL (071290) - Demolition of light industrial unit and garages and erection of 4 x 2 bedroom houses - Refused 25/1/2008 - Lack of off-street vehicle parking; does not comply with standards with respect to cycle storage; inadequate amenity space; unacceptable degree of overlooking for the private gardens to the rear of the site; absence of completed S106 legal agreement.
- 3.17 09/00472/FUL (090774) - Demolition of existing light industrial unit and garages and the erection of 3 x 3 bedroom terraced houses (re- submission of planning application 08/01622/FUL) - Approved 12/10/2009
- 3.18 10/01354/FUL (101364) - Erection of 4x 2 bed houses - Refused 15/10/2010. Appeal dismissed 24/5/2011 - APP E0345/A/11/2145320/NW

19-23 Wilson Road

- 3.19 05/00858/FUL (051303) - Demolition of existing workshops, erection of one two-bed house, two one-bed flats and change of use of ground floor no. 21 from associated business back to residential - Approved 21/9/2005
- 3.20 06/01222/FUL (060988) - Demolition of existing redundant workshops and associated buildings and construction of 5 no. terraced houses - Approved 2/1/2007

4. CONSULTATIONS

Internal / external consultations

4.1 RBC Transport Development Control

- 4.2 Initial comments 08/02/2022: The site is located within the Zone 2, the primary core area but on the periphery of the Zone 3, Secondary Core Area, of the Council's adopted Parking Standards and Design SPD.

- 4.3 The proposal consists of the construction of 2 x 2 bedroom semi-detached houses at the rear of 12 and 14 Wantage Road (fronting Wilson Rd). Wilson Road is subject to "No Entry" from the south and therefore in the vicinity of the site the road is effectively one way, working north to south. The carriageway is narrow and is effectively reduced to

single lane by on street parking. Double yellow lines run along the proposed frontage of the dwellings. Shared user bays are available close to the site, whereby parking is permitted for non-permit holders for a maximum of 2 hours between 8 am - 8pm and all other times for residents permit holders only.

- 4.4 In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide one off street parking space for each dwelling. The submitted block plan illustrates 1 parking space on the frontage of each proposed dwelling, the parking spaces will be accessed via Wilson Road from existing dropped crossings; any works or adjustments on any part of the public highway or footway which includes drop crossings will require a license from the Highways Department.
- 4.5 Given that no's 12 and 14 Wantage Rd currently use the rear garden areas for off street parking the proposed provision is acceptable in this instance; however, if gates are proposed they will need to be set back into the site by a minimum of 5m to ensure vehicles do not obstruct the carriageway whilst waiting to enter the site. Clarification is required.
- 4.6 Whilst the proposed development will displace existing parking provision for Nos 12 and 14 Wantage Rd, our records indicate that both properties have been issued with Residents Parking permits which allows them to park in CPZ. The site is accessible to good public transport links and local shops, any additional parking demand created by this development should not be accommodated on the surrounding roads where there is significant demand for on-street parking; Therefore, parking conditions and informative should be applied to prevent any future occupants of the new dwellings from obtaining residents and visitor parking permits for the surrounding residential streets to protect the amenities of the existing residents.
- 4.7 The proposed parking areas should be made of permeable material as any proposal should not increase any surface water run-off from the site onto the Public Highway. The driveway would need a drainage channel provided where the driveway meets the back of the footway.
- 4.8 The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. 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. This will need to be illustrated on revised plans.
- 4.9 In accordance with the adopted Parking SPD, the development is required to provide a minimum of 1 cycle parking space for each dwelling which should be in a conveniently located, lockable, covered store; Details of the type of secure storage will need to be provided and illustrated on plans.
- 4.10 Bin storage has not been illustrated. Bin storage should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings and should be located no further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods. Location of bin storage/collection point will need to be illustrated on plans although it is assumed it will be kerb side from Wilson Rd.
- 4.11 A construction management statement will be required for this development.
- 4.12 The applicant will need to address the above points so that this application can be fully determined.

- 4.13 Further comments on 11/03/2022, following the submission of revised and additional plans on 05/03/2022 which, for example, show a 1.9m fence is proposed on both side boundaries forward of the proposed buildings towards the Wilson Rd frontage. A summary of the further/revised comments are:
- Fences or walls within a visibility splay should be no higher than 0.6m above carriageway level; therefore the 1.9m fences, as now shown to be proposed, would not be acceptable.
 - The Transport officer requests a revised plan with the amended fence height to be provided. Please also see my comment below in terms of the block plan showing the height of the boundary treatment around the site - this is still required too and it is now likely that the boundary treatment will be at different heights at different points of the site. As such, please ensure the elevation and block plans are clear in specifying the fence heights at all relevant points.
 - The Transport officer also requests the submission of visibility splays and tracking illustrations to be provided too, to justify the safety / manoeuvrability of the vehicles onto Wilson Road, as proposed.
 - The updated block plan has not sufficiently addressed previous comments regarding bin storage/collection, cycle storage and EV points; these should be fully illustrated on plans. Please refer to chapter 5 of the Transport SPD for the design standards for cycle parking and the waste guidelines for bin storage areas (each property should include space for 1 x 240 litre general waste bin, 1 x 240 litre recycling bin and space for a food waste bin too). Updated/further information should be submitted.
- 4.14 **RBC Valuations** - The Council's Valuer has not been provided with any viability report to assess. As such, no comments have been provided.
- 4.15 **RBC Ecology consultant (GS Ecology)** advised on 22/02/22 that the application site comprises the end of two residential gardens which back onto Wilson Road. It is proposed to convert this area a pair of semidetached dwellings. The application site is located in an urban, residential area of Reading.
- 4.16 The land appears from google maps to comprise gardens including a number of sheds and larger garages. Given the urban location of the site and the nature of these buildings, they are unlikely to host bats. However, a condition should be set to ensure that any clearance or demolition undertaken to facilitate the works should be carried out outside the bird nesting season (March - August).
- 4.17 Paragraph 180 of the NPPF states that *"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; [...]"*
- 4.18 As such, the development should be designed so that its value for wildlife is maximised, for example by providing integral bird and bat boxes, mixed native hedges and new tree planting within the development. This should be secured via a planning condition. Wording is given below.

Condition: All buildings, trees, hedges and shrubs or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

Reason: To ensure that wildlife is not adversely affected by the proposed development in line with Policy CP7 of the core strategy and wildlife legislation.

Condition: Prior to the commencement of works, details of biodiversity enhancements, to include a minimum of two universal nest bricks and two bat brick or tiles built into each of the new buildings and native and wildlife friendly landscaping (including gaps at the bases of fences to allow hedgehogs to traverse through the gardens), shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved and prior to occupation of the development a letter report from a suitably qualified ecologist with photos of the bricks in situ shall be submitted to and approved in writing by the council.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 179 and 180 of the NPPF

- 4.19 **RBC Natural Environment** - the Assistant Natural Environment Officer advised on 14/04/2022 that this address is located within the Air Quality Management Area and the application effectively proposes a new development along, as such tree retention and planting are an important criteria in assessing the proposal.

- 4.20 The 2019 Local Plan's policy **EN14 Trees, Hedges and Woodlands** states that

'Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. [...] New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.'

- 4.21 With reference to the Design & Access Statement dated 25th October 2020 and the Block Plan Drg. No. 20099.S.PP-37, the following are noted:

Tree retention

- 4.22 Google Street Imagery shows there are no (significant) trees on site but some trees are growing within neighbouring properties which could be affected by the development and associated activities (construction site). Here I note a number of conifers which appear to line the boundary with the rear garden of 10 Wantage Road and some broadleaved trees in the rear garden of no. 16 Wantage Road.
- 4.23 As per our validation checklist, all trees growing within falling distance or 15m (whichever is smaller) from the proposed development should be accurately plotted on a plan and, if it is likely that construction site operations or development affect said trees, an arboricultural impact assessment should be submitted.
- 4.24 It is likely that it is feasible to protect the above mentioned existing trees during development, as such prior to a decision the agent is required to submit only a tree location plan showing their location (trunk position and crown extent) in relation to the proposed development along with the location and specification of tree protection measures to ensure the RPAs and canopies are protected - effectively a TPP that can be secured via condition (to avoid a pre-commencement condition).

Landscaping

- 4.25 No soft landscaping information is provided by either the DAS or the Block Plan, as such landscaping principles are not demonstrated, as they should be - contrary to policy EN14, EN15 and the aims of our Tree Strategy.

- 4.26 The set back from the street is acknowledged and is positive as it creates potential for planting to improve the street scene - some planting should be provisioned now to demonstrate landscaping principles (albeit details of this can be secured later via condition), albeit carefully considered as to its feasibility to ensure it is compatible with being adjacent to parking spaces.
- 4.27 As the rear garden of nos. 12 and 14 Wantage Road are divided to allocate the space for the proposal, privacy planting should be provisioned on the rear boundary. Two trees (1 each unit) suitable in ultimate size should also be provisioned in the rear gardens to increase canopy cover in the area, in line with our EN14 policy and aims of our Tree Strategy.
- 4.28 In conclusion, this application is not currently supported in terms of trees and landscaping due to the lack of information submitted (no existing tree location/protection plan, no landscaping principles) - however, I note that the current overall layout provides opportunity for sufficient new planting and with a brief submission this assessment can change positively (a tree location plan and a landscaping plan, both brief, are necessary).

Public Consultations

- 4.29 Adjoining occupiers were consulted by letter on 04/02/2022. A site notice was sent to the applicant to erect, but it was not confirmed whether this had been erected (despite attempts for this to be confirmed).
- 4.30 One objection was received from 16 Wantage Road, in the form of two separate submissions (on 24/02/2022 and 29/03/2022, with the March response being co-joined with the separate application 220032 at r/o 24&26 - see relevant history above). A summary of the issues raised were as follows:

- fails to meet DM11 - particularly unacceptable regarding DM11 criteria; 1 (first 3 point), 2, 6, 7, 8, i.e. overbearing close proximity to Wilson & Wantage Rd. properties, constrained garden amenity, impact on ecology due to garden block fragmentation.
- The rear window distance to adjacent buildings is much less than 20 m - see the green line from 1st floor windows below:



- Concerns that unclear breaking of 20m distance in permissions 161760 and 191239 at r/o 24-26 sets a precedence that may result in pressure to reduce the importance given to property separation, now and in the future. Neighbour values the amenity of their garden, want to maintain privacy and do not want to lose this

to overbearing buildings in unduly close proximity and an overcrowded community.

- The recommended minimum garden amenity area for 12 & 14 Wantage Road would leave just 5.8 m for proposed properties and no parking.
- Disrupt the biodiversity established on the 122 year old garden block area at the rear of the 12 property Wantage road terrace.
- CIL dated 03/11/2021 is invalid as it predates the application, dated 27/01/2022, and includes 16 Wantage Road in the site description, which is not owned by the applicant.

Equality Act 2010:

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.

5. 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) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework 2021
National Planning Practice Guidance

Reading Borough Local Plan (2019)

CC1 Presumption in Favour of Sustainable Development
CC2 Sustainable Design & Construction
CC3 Adaptation to Climate Change
CC5 Waste Minimisation and storage
CC6 Accessibility and the Intensity of Development
CC7 Design and the Public Realm
CC8 Safeguarding Amenity
CC9 Securing Infrastructure

EN12 Biodiversity and the Green Network
EN14 Trees, Hedges and Woodland
EN15 Air Quality
EN16 Pollution and Water Resources

H1 Provision of housing
H2 Density and Mix
H3 Affordable Housing
H5 Standards for New Housing
H10 Private and Communal Outdoor Space
H11 Development of Private Residential Gardens

TR1 Achieving the Transport Strategy
TR3 Access, Traffic and Highway-Related Matters
TR4 Cycle Routes and Facilities
TR5 Car and Cycle Parking and Electric Vehicle Charging

Reading Borough Council Supplementary Planning Documents

Employment, Skills and Training SPD (2013)

Affordable Housing SPD (2021)

Revised Parking Standards and Design SPD (2011)

Revised SPD on Planning Obligations under Section 106 (2015)

Sustainable Design and Construction SPD (2019)

Other relevant documentation

Reading Tree Strategy (2021)

Reading Biodiversity Action Plan (2021)

DCLG Technical housing standards - nationally described space standard (2015)

BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, 2nd edition (2011) (application submitted prior to 8 June 2022 edition being published, so reasonable to assess on the basis of the 2011 version)

Local Transport Plan 3 Strategy 2011 - 2026 (2011)

Manual for Streets (2007)

British Standard 5906: 2005 for Waste Management in Buildings (2005)

6. APPRAISAL

6.1 The main issues in assessing the application are considered to be:

- i) Principle of development in land use terms
- ii) Scale, appearance, design and impact on character and appearance of the area
- iii) Affordable housing
- iv) Housing Mix
- v) Quality of accommodation for future occupiers
- vi) Amenity for nearby occupiers
- vii) Transport
- viii) Trees, landscaping and ecology
- ix) Sustainability
- x) Overall Planning Balance and Conclusion

6.2 Accordingly, each issue is considered in-turn.

- i) Principle of development in land use terms

6.3 In the first instance it is confirmed that the existing garages proposed to be demolished are considered to be of no architectural or historic merit to warrant their retention. The structures are not listed, within a conservation area or locally listed. Within this context there is no in-principle objection to the existing structures being demolished, subject to a reasonable redevelopment scheme taking its place.

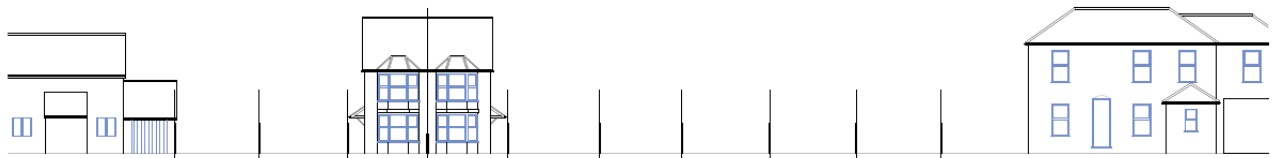
6.4 In purely land use terms the proposed development would result in the creation of two residential units. The principle of providing additional residential units aligns with the broad objectives of policy H1, in assisting to meet the annual housing targets. This is a planning benefit of the proposed development.

- ii) Scale, appearance, design and impact on character and appearance of the area

6.5 It is relevant to acknowledge at the outset that the NPPF, at paragraph 119, states that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”.

- 6.6 The NPPF definition of ‘previously developed land’ excludes private residential gardens. Therefore, it is clear that the priority for development should be on previously developed land, in particular vacant and derelict sites and buildings. However, that does not mean that the development of private residential garden land is unacceptable in principle, rather that, previously developed land should be the first choice for housing development. Hence, the principle of the redevelopment of the site for further residential development could be acceptable subject to the above criteria, meeting relevant policies and other material planning considerations.
- 6.7 With the above in mind, local policies CC7, H2 and H11 are of particular relevance in a proposal of this nature. These policies are self-explanatory in terms of seeking high design quality, an appropriate density informed by a variety of factors and a series of requirements for proposals involving new residential development within land of private residential gardens.
- 6.8 In overall terms Wilson Road is a narrow, mainly residential road with an informal mix of terraced and semi-detached houses. At the point where the application site is located (on the east side of the road), the character is fairly open, with a series of single storey structures mainly set back from the frontage and associated with the residential uses of properties which front onto Wantage Road. Whilst it is acknowledged that some residential developments have been permitted at either end of this stretch in recent years (see relevant history above), but the immediate vicinity where the application site is located remains largely open / small scale ancillary structures and boundaries, with single storey garages/gates/entrances predominant. This contrasts to the west side of Wilson Road, with its long-established terraced dwellings and further to the south on the east side of Wilson Road.
- 6.9 The proposed development is for a matching pair of two-storey semi-detached dwellings with a two storey front bay projection. The proposed development is set back from the Wilson Road frontage with on-site car-parking proposed. A nominal gap is provided from each side boundary, to provide access to the front entrance to each property (located to the side of each property) and the rear amenity space. The proposed dwellings are two-storey in nature, but also include substantial roofspaces (no accommodation is denoted on the plans within the roofspaces).

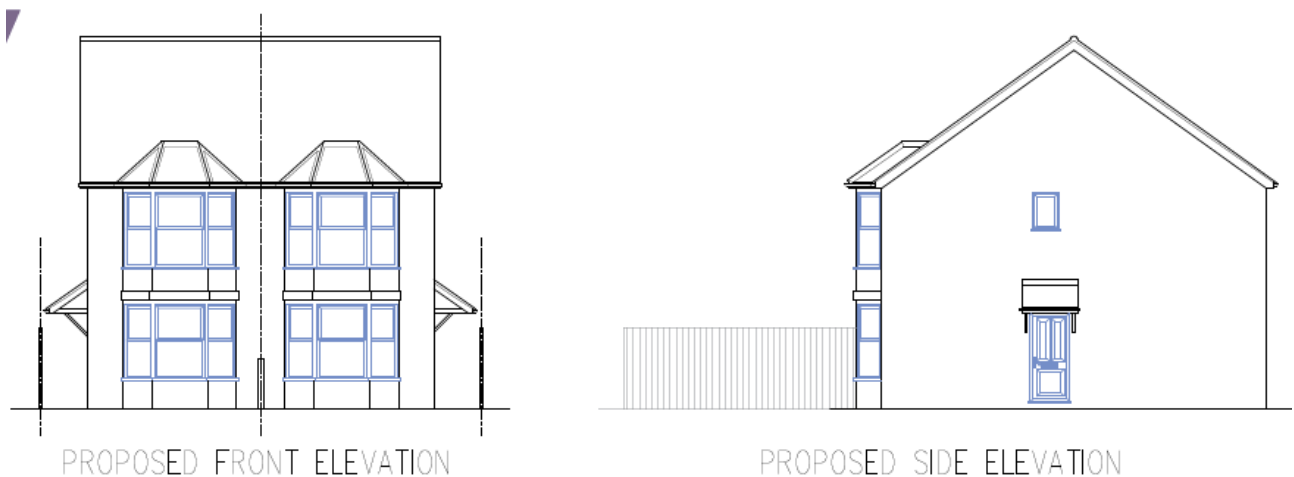


Proposed streetscene elevation submitted by applicant



Google Streetview image of Wilson Road looking south (April 2021)

- 6.10 The proposed development would by its very nature be a visually prominent addition along the streetscene. The open character of this part of Wilson Road would be disrupted by the proposed development, with this exacerbated by the extent to which the proposed building projects into the plot (i.e. the depth of the dwellings). Given that the current openness is considered to form a valuable contribution to the overall character of this section of Wilson Road, the proposed development would visually jar with the long-established character and, in addition, the proposed footprint of development would represent an overdevelopment of the site. The proposed development would contrast sharply and negatively with the immediate neighbouring and nearby context along this part of the east side of Wilson Road, thereby failing to make a positive contribution to the character of the area. Instead, the impact of the proposed development would be harmful to the character and appearance of the area. The proposal is therefore contrary to Policies CC7 (Design and the Public Realm), H2 (Density and Mix) and H11 (Development of Private Residential Gardens of the Reading Borough Local Plan (2019).



Proposed front and (south) side elevation plans

- 6.11 At the more detailed design level, the applicant's supporting commentary states "Our proposal is to blend within the characteristics of the east of Wilson Road. The appearance of the new concept is sympathetic to the area, retaining a ground floor bay window as per the surrounding properties. The roof structure also to be a gable end within keeping of the Victorian façade that is Wilson Road". The application form clarifies proposed materials as red facing bricks, slate tiles, PVC windows and timber fencing. In response, the proposed design is seeking to maintain the character and appearance of the area. In order to enhance it (as required by Policy CC7) it is considered that detailing within the brickwork (e.g. patterned brickwork, characteristic of the area) and design details such as windows lintels would be necessary. Had the proposals been supported at officer level, discussions in these regards would have been undertaken with the applicant, to seek to secure a level of design quality which enhances the character and appearance of the area, rather than the current level of detailing which would only maintain the quality. The provision of timber more traditional timber windows, rather than PVC specified, would be another area for discussion with the applicant. Ultimately, such detailing could have been secured via condition in the event of the application being acceptable and, therefore, this does not form a specific component part of the reason for the refusal of the application.

iii) Affordable housing

- 6.12 In line with Policy H3 a financial contribution is required to be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough. It is relevant to note that RBC policy contrasts from the NPPF in relation to small sites, with local circumstances justifying contributions towards affordable housing in all instances where a net increase in units is proposed (barring some exceptions). The

Council's position has been supported on appeal in numerous instances prior to and subsequent to the latest version of the NPPF (in 2021). In this instance the applicant has specified that both residential units would be for market housing and has been silent in respect of either making an appropriate financial contribution, or submitting viability evidence in an attempt to justify a lower (or nil) contribution. Officers have made various attempts for a viability submission, which it is understood the agent/applicant was seeking to advance, to be submitted (see section 2 of this report for an overview of correspondence), but ultimately nothing has been forthcoming from the agent/applicant. It is therefore considered that the proposal is not making an appropriate contribution towards affordable housing. Thus, 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 Policies H3 and CC9.

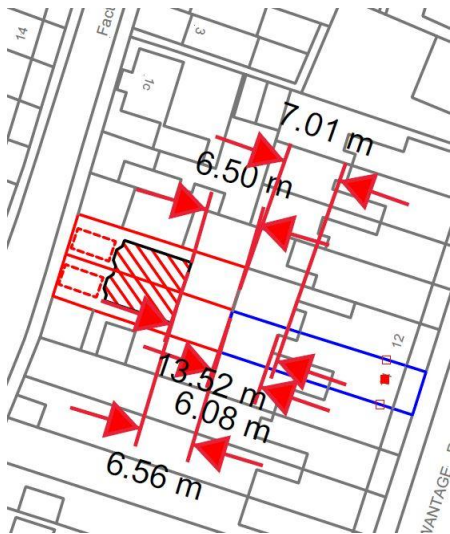
iv) Housing Mix

- 6.13 The proposed mix of 2x2-bed units is considered appropriate in this instance. Although both units are of an identical size (thereby not providing a mix), given the small number of units created this is satisfactory in this instance. Had the application been able to be supported it would have been recommended for a condition to be secured whereby no change to the unit mix (2x2-bed units) shall have been permitted to have been made to the development without written approval from the Local Planning Authority. This would be to safeguard the mix altering to potentially unacceptable mixes in the future, while also having a dual benefit of not altering the sales values of units (which could improve scheme viability) without this being managed and assessed by the local planning authority.

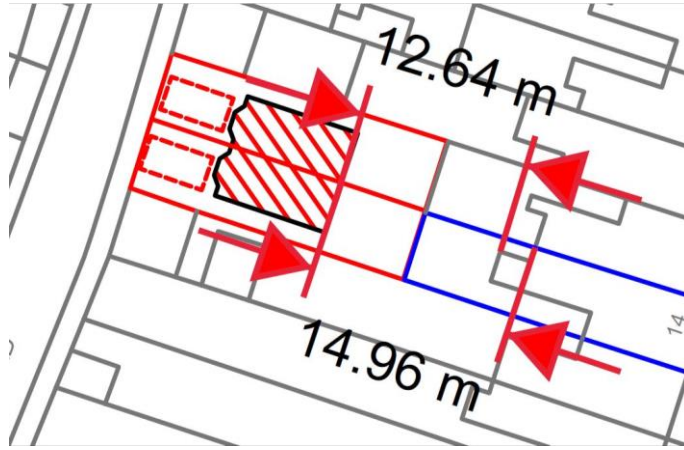
v) Quality of accommodation for future occupiers

- 6.14 It is first noted that in respect of the Policy H5 criteria, the applicant did not respond to a request to provide a standalone statement to demonstrate how the proposals had been advanced to comply with these requirements. In terms of Policy H5a, as 2-bed 2 storey dwellings the minimum GIA area is 70sqm (for a 3 person unit - as appears to be proposed) or 79sqm (for a 4 person unit) and 2sqm of built in storage. The information submitted with the application is not consistent, with the floor plan areas plan specifying unit 1 as 58.1sqm and unit 2 as 58.2sqm and the proposed first floor plan stating each unit is 60.6sqm in size (cupboard at first floor level provides the required storage). By either calculation, the overall size of the units are both significantly below the minimum floorspace total. Had the proposals been able to be supported, the scheme could have been altered to adjust the units to 1-bedroom units to comply with the minimum floorspace standards. There is also the possibility, owing to the nature of the proposed roof plan proposed (no accommodation proposed, but a height and nature that may accommodate dormers) that roof dormers could have been sought to have been included, possibly as part of a separate application (this could have been managed through a restrictive condition to prevent this occurring under permitted development, to avoid the increase in size/value of the units without this being captured in the viability/affordable housing contribution). At the same time however, the shortfall in floorspace is another indication of the overdevelopment of the site and inappropriateness of it for residential development on the footprint / size sought. Notwithstanding these shortfalls, the rooms are in themselves fairly regular in shape and nature and given the possible scope to alter these to 1-bed units, therefore on balance, the floorspace deficiencies do not in themselves warrant a reason for refusal.
- 6.15 In terms of Policy H5b,d and e no details were submitted by the applicant, meaning that such details would have been secured via condition (there is no evidence to suggest inherent issues which means meeting these standards would be possible to be met).

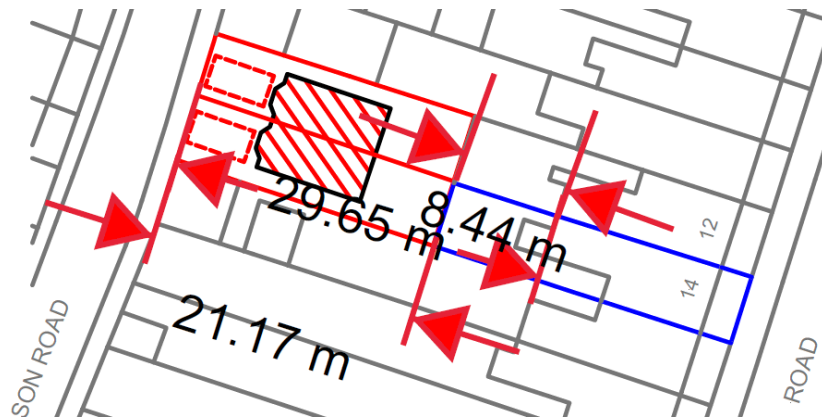
- 6.16 In terms of air quality (Policy EN15), the site is within an air quality management area and would introduce a sensitive use (residential) into such an area. No air quality statement has been submitted with the application. Had the application been able to be supported, an early stage condition would have secured details, including mitigation measures if necessary.
- 6.17 With regard to outdoor amenity space, Policy H10 requires outdoor areas to respect the size and character of other similar spaces in the vicinity amongst other requirements. The proposed garden areas fall well below guidance in Policy H10 which states in paragraph 4.4.87 “the Council has sought the following minimum provisions for private or communal outdoor space.....and they provide a useful guide for proposals: (a) Houses: Useable private outdoor space should be no less than the gross floor area of the dwelling to which it relates (measured externally and including garage space)”. This would be the case even if the front amenity space parking spaces are taken into account. The proposed depth of the gardens is 6.5m and this is atypical of the predominant garden depth in the vicinity of the site.



- 6.18 Both the amenity space for future occupiers and the resultant space for the existing No's 12 and 14 Vantage Road does not compare favourably with the predominant character in the area. Although there are a few examples of similar garden spaces the majority along both Wilson and Vantage Road are at least double in size and larger or relate to smaller terrace properties.
- 6.19 More specifically, the applicant has indicated a rear garden depth of 6.5m for the proposed dwellings. No functional front garden amenity space is provided owing to the footprint of the buildings and the provision of car parking, as sought.
- 6.20 For the existing No's 12 & 14 Vantage Road, the proposals inevitably result in a significant reduction (of over two-thirds of the space) in rear amenity space (from 29.65m), reducing the depth to between 7m (from the rear building line) or 8.44m (not including the small ground floor rear projections). Many properties along Vantage Road, which back onto Wilson Road, have 20-30m deep outdoor amenity areas.



12.64m between ground floor levels (closest points)
14.96m between first floor elements (closest points)



29.65m between rear building line of No's 12 & 14 (excluding small single storey projections) to Wilson Road pavement (i.e. the depth of the existing rear amenity space)
21.17m depth of the proposed dwellings
8.44m depth of remodelled rear amenity spaces for existing No's 12 & 14 Wantage Road (excluding small single storey projections) to the boundary with the proposed dwellings
*Given this is based on the site location plan (1:1250) there is a degree of non-precision in the figures/measurements.

- 6.21 It is not considered that any examples of surrounding shortfalls should form the basis for poor provision of garden space for new development and along with the significant reduction of the existing garden space to the rear of 12 and 14 Wantage Road officers consider this has a detrimental effect on the overall prevailing character and pattern of development in the area. It is also worthy to note that the Wantage Road properties are of a relatively larger size (in footprint and form terms) to the application site buildings, providing another indication that the proposals do not align with the prevailing character. The amenity space issue was considered and accepted by the Inspector on an appeal at 13 Wilson Road (see relevant history above) for four two bed terraces in 2011. The Inspector stated (Paras 4 & 5) that:

"the proposed amenity space would be below the Council's minimum standards. Whilst standards should be flexible, the proposed gardens.. would be very small and provide a limited area for outdoor living. The gardens would be cramped and restricted creating a poor external environment for the future occupiers detracting from the living conditions. There are recreation areas reasonably close to the appeal site. However, they are not private, nor are they part of people's living space, and this would not compensate for the lack of gardens at the appeal site."

The houses to the north of the appeal site have very small, tapering gardens, but these are not typical, and would not set a precedent for garden sizes in Wilson Road.”

6.22 Overall it is considered that the small garden size for the proposed dwellings and the significant reduction in garden space for the existing properties at 12 and 14 Wantage Road would result in an unacceptable level of amenity for the future and existing occupiers, detracting from their living conditions contrary to Policies CC7, CC8, H10 and H11.

6.23 In terms of the proposal according with the Policy CC8 requirements for future occupiers, some shortcomings are identified. The proposals are not considered to result in any day/sunlight, noise/disturbance, artificial lighting, vibration, dust and fumes, smell, crime and safety (providing boundary treatments are secured via condition) or outlook / overbearing impacts for future occupiers (within the context of this being new residential accommodation) to warrant refusal of the application on these basis. Some of these matters are on balance, with for example outlook not being optimal given the existing surrounding context. However, concerns are raised in relation to privacy/overlooking. More specifically, the under 15m back to back distance between the ground and first floors of the proposed buildings and the existing No's 12 and 14 is of significant concern (see calculations above). Policy CC8 (Safeguarding Amenity) states that:

‘the position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.’

6.24 Officers do not consider that the circumstances of the site allow for the proposed dwellings to be closer, with large rear windows shown to be proposed at both existing and proposed first floor levels. In addition, the limited depth of the resultant gardens means overlooking is likely to be created and possible to/from the garden areas of nearby properties. The inadequate back-to-back distance creates a development within this suburban setting that would suffer poor privacy and overlooking from the outset for future occupiers, contrary to policies CC8 and H11 of the Reading Borough Local Plan.

6.25 In overall terms, considering the proposed scheme on its own merits, there are clear instances where the proposals would provide unacceptable living conditions for future occupiers, most notably in terms of the inadequate amenity space and overlooking/privacy issues arising from an insufficient back-to-back distance. This forms a basis for the refusal of the application.

vi) Amenity for nearby occupiers

6.26 The proposed development would undoubtedly result in a different context for existing nearby occupiers on both Wantage and Wilson Road. There are some overlapping issues with those referenced above in the ‘quality of accommodation for future occupiers’ section, with concerns in respect of overlooking/loss of privacy for 12 & 14 Wantage Road from the proposed rear elevation of the proposed development equally applicable here. The reduction in over two thirds of the amenity space for these properties is also a negative consequence of the proposed development.

6.27 In respect of other nearby properties, whilst the context of overlooking/loss of privacy would be worse for other occupiers of Wantage Road properties, this would not be in the same direct orientation as for No's 12 & 14, downplaying the extent of the impact to such a level that, although worse than existing, would not be of a level in itself to warrant refusal of the application on these grounds. In terms of the front-to-front distance between the front of the properties and the front elevations of properties on the west side of Wilson Road, a distance of 17m would result from the proposed works.

Although there is no specific front-to-front distance referenced in Policy CC8 (only a back-to-back distance is referenced), on balance given the nature of the Wilson Road highway, it is considered that this should not form part of the reason for refusal of the application.

- 6.28 In terms of outlook and visual dominance/overbearing impacts, the proposed development would unquestionably lead to a contrasting context in comparison with existing for Wantage Road occupiers, reducing outlook and being visually dominant within the context of the existing garage / single storey structures and the western side Wilson Road terrace beyond. However, the extent of the change (mainly owing to the existing Wilson Road terrace) is not considered so different / harmful to seek to resist the proposals on this specific basis.
- 6.29 In relation to other amenity based matters (e.g. daylight and sunlight, noise/disturbance, artificial lighting, vibration, dust and fumes, smell, crime and safety) the proposals are not considered to cause such a detrimental impact on the living environment of existing residential properties to warrant the refusal of the application on these grounds. In some regards the proposals would have a negative impact in comparison with existing (e.g. daylight and sunlight, particularly to amenity areas), but the scale of the negative impact would not be of a sufficient basis to warrant a sustainable reason for refusal should these specific matters be tested at appeal.

vii) Transport

- 6.30 As per the Transport observations detailed at section 4 above, a number of elements would have been secured via condition had the proposals been able to be supported. However, concerns are raised with the proposals in relation to highway safety issues associated with the on-site car-parking and interaction with the proposed site boundary treatments. The amended plans during the course of the application showed 1.9m boundary fences forward of the front elevation of the building and up to the Wilson Road pavement. Given the inclusion of on-site parking, there is consequently a conflict created in terms of highway and pedestrian/cyclist safety in terms of vehicles safely entering and exiting the proposed off-street spaces, given Transport officers advise that fences or walls within a visibility splay should be no higher than 0.6m above carriageway level. Given the narrow nature of Wilson Road too, the proposals are considered to have a material detrimental impact on the functioning of the transport network and be detrimental to the safety of users of the transport network, including pedestrians and cyclists (Policy TR3). No visibility splays and tracking illustrations, as requested, have been provided to justify the safety / manoeuvrability of the vehicles onto Wilson Road, as proposed. This is despite these being fed into the applicant and revisions/more information being sought. Accordingly, it forms a reason for refusal of the application.
- 6.31 Whilst there are other shortfalls in the transport-based information submitted with the application (e.g. precise details in respect of bin storage/collection, cycle storage and EV charging points), both individually and cumulatively the other issues are not matters which it is considered should form a reason for refusal, as put simply the matters are of a nature which could ultimately be managed by the imposition of planning conditions. Accordingly, these other shall not form a reason for refusal in this instance. However, the concerns associated with highway safety as a result of the vehicular access and site boundaries do form a reason for refusal of the application.

viii) Trees, landscaping and ecology

- 6.32 In terms of trees and landscaping matters, as referenced by the Assistant Natural Environment Officer (see section 4 above), there are some shortfalls in the level and nature of information submitted with the application. However, Planning Officers consider that ultimately these matters could be satisfied through the use of conditions in

the event that permission had been able to be supported, meaning they do not form reasons for refusal of the application in themselves.

6.33 With regard to Ecology matters, the Council's Ecology consultant (detailed in section 4 above), is content with the proposals subject to conditions. These would have been secured had the proposals been able to be supported.

ix) Sustainability

6.34 In line with Policies CC2, CC3 and H5 proposals for new housing will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. No details have been submitted with the application however, had the proposal been acceptable this could have been dealt with by way of planning conditions.

x) Overall planning balance and conclusion

6.35 It is fully acknowledged that there would be some planning benefits associated with the proposed development, such as the provision of 2 residential units to assist with the Boroughs housing targets. There are some other instances where the proposals are acceptable or further details could have been secured via condition. However, when considering the application on its own merits there are considered to be a number of significant shortfalls, such as the:

- Overdevelopment of the site, harmful to the wider streetscene and prevailing pattern of development, failing to make a positive contribution to the character of the area
- Inadequately sized amenity space for future occupiers and inadequate back-to-back distance with Wantage Road properties and associated amenity (privacy/overlooking) concerns for both future occupiers and current nearby occupiers, and
- Highway safety in relation to vehicles into/out of the site to/from Wilson Road

6.36 Furthermore, the lack of an affordable housing contribution (and this then being secured via legal agreement) is a further shortcoming.

6.37 As such, when applying an overall critical planning balance of all material considerations, the various shortfalls of the proposals are such that in overall terms these concerns override the merits. Put another way, in overall terms the concerns are so significant so as to weigh against the proposals when considering all relevant material considerations. Accordingly, within the context of national and local planning policies and other material considerations, as detailed in the appraisal above, full planning permission is recommended to be refused.

7.0 RECOMMENDATION

Refuse Planning Permission for the following reasons:

1. The proposed development, by reason of the relationship between the plot size and overall scale and footprint of development, would be visually prominent within its context and dominate views along this largely open section of Wilson Road. It would be an overdevelopment of the site, harmful to the wider streetscene and prevailing pattern of development, therefore failing to make a positive contribution to the character of the area, contrary to Policies CC7, H2 and H11 of the Reading Borough Local Plan 2019.
2. The proposed development, by reason of its proposed footprint / site area and resultant rear amenity areas and separation distances with the existing No's 12 & 14 Wantage Road, would result in uncharacteristic small rear amenity areas for existing and future occupiers, the loss of privacy and overlooking for existing nearby occupiers and

unacceptable living conditions for future occupiers, contrary to Policies CC8, H10 and H11 of the Reading Borough Local Plan 2019.

3. The proposed development, by reason of its proposed on-site parking and relationship with the proposed boundary treatments, would have a material detrimental impact on the functioning of the transport network and be detrimental to the safety of users of the transport network by virtue of the height of boundary treatments resulting in inadequate visibility between the site and the pavement/Wilson Road, contrary to Policies TR3 and H11 of the Reading Borough Local Plan 2019.
4. 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 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing (2021) and Planning Obligations under Section 106 (2015) Supplementary Planning Documents.

Informatives:

1. The decision relates to the following drawings and documents:

20099.S.PP-36 Location Plan, as received 26/01/2022

20099.S.PP-50 Existing Floor Plan, as received 26/01/2022

19130PP-31 Existing Elevations, as received 26/01/2022

20099.S.PP-38 Rev A Existing Floor Plan, as received 05/03/2022

20099.S.PP-37 Rev A Block Plan, as received 05/03/2022

20099.S.PP-32 Proposed Ground Floor Plan, as received 26/01/2022

20099.S.PP-33 Rev A Proposed First Floor Plan, as received 05/03/2022

20099.S.PP-34 Proposed Roof Plan, as received 26/01/2022

20099.S.PP-35 Rev A Proposed Elevations, as received 05/03/2022

20099.S.PP-39 Proposed Floor Plan Areas, as received 26/01/2022

20099.S.PP-40 Proposed Section, as received 05/03/2022

20099.S.PP-41 Proposed Street Scene Showing Wilson Road East Elevation, as received 05/03/2022

Design & Access Statement by HAC Designs Ltd, dated 25/10/2020, as received 05/03/2022

2. The local planning authority has worked with the applicant in a positive and proactive way by clearly setting out concerns relating to the proposal and providing an opportunity for the applicant to withdraw the application. However, the applicant chose not to withdraw the application, hence the issuing of this refusal notice.
3. Without prejudice to any future application or appeal, the applicant is advised that part of reason for refusal 4 could be overcome by entering into a Section 106 Legal Agreement or unilateral undertaking for a scheme that was in all other respects acceptable.
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.
5. This planning application was submitted without the benefit of first seeking pre-application advice from the Local Planning Authority, which can often result in the avoidance of refusal of planning permission. Please see the following link to the

Council's pre-application service here: <https://www.reading.gov.uk/planning-and-building-control/planning-applications/before-making-a-planning-application/pre-application-advice/>