

PLANNING STATEMENT

Maxika Homes

For the residential redevelopment comprising demolition of existing single storey building and erection of 16 dwellings together with associated works at 220 Elgar Road South.

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Introduction

Nova Planning has been instructed by Maxika Homes (the Applicant) to prepare and submit a revised application following the refusal of application ref 210526 - For the residential redevelopment comprising demolition of existing single storey building and erection of 16 dwellings together with associated works at 220 Elgar Road South, Reading.

The previous application was validated by Reading Borough Council on the 6th April 2021 for the development of 18 units. However, following design concerns raised by the planning team, the scheme was revised and amended down to 16 units. Amended plans were submitted in late November and registered as of the 1st December 2021.

Following a review of the revised plans, a decision was made on the 6th of December refusing the scheme – please see appendix 1 for decision notice and Appendix 2 for the officers report.

This application is a revision to the previously refused scheme and the proposal has been redesigned to address the previous reasons for refusal.

Site Description

The site measures approximately 0.14 Ha and is located on the Western side of Elgar Road South, approximately 1km south of Reading town centre. The wider context comprises a mixture of residential and commercial land uses on both sides of Elgar Road, extending to the Waterloo Meadows to the West which provides an unbuilt buffer to the River Kennet. The immediate context and character on the western side of Elgar Road is residential, with existing residential properties to the north, south and west.

The existing building was constructed on site in the 1950's. It is single storey brick construction with a flat roof and raised parapet. Part of the building was recently used as a driving test centre with the remaining office accommodation lying vacant for a period of 12-months at the time of submission.

The building is set back from Elgar Road South, behind a low-level boundary wall. The frontage is landscaped but poorly maintained and does not make any meaningful contribution to the appearance of the site. The rear of the site is dominated by hardstanding which provided parking for the uses contained within the building.

The site is adjoined to the north by residential flats over 3 storeys with steep pitched roof. This building is sited immediately adjacent to the highway with no landscaping and limited relief from the footway. The building is dual aspect to the east and west with a flank gable addressing the application site.

To the south, the site is adjoined by semi-detached dwellings over two storeys with steep pitched roofs. These dwellings are set back from the highway with frontages comprising car parking and limited landscaping. The dwellings are also principally dual aspect to the east and west with hipped side elevation addressing the application site.

The site is adjoined to the west by semi-detached dwellings over two storeys. These dwellings are dual aspect north and south, with flank gable addressing the application site.

Planning History

The site has been the subject of a number of planning applications to Reading Borough Council (RBC) as follows:

- 210526 - Residential redevelopment comprising demolition of existing single storey building and erection of 18 dwellings together with associated works – Refused 6th December 2021;
- • 09/01870/FUL (Civica Ref: 091872) - Change of use from B1 offices to D1 Church Use. Refused 31/12/2009;
- • 92/00871/GOV (Civica Ref: 920541) - Change of use from office (B1) to driving test centre (sui generis). Observations sent 06/01/1993;
- • 89/01089/OUT (Civica Ref: 891394) - Construction of light industrial 'Hi-tech' unit plus onsite parking (renewal of planning permission 86TP802). Refused 23/11/1989

Pre-application

The site was also the subject of a pre-application enquiry which was submitted to RBC in August 2020 – please see appendix 3. The enquiry sought advice on a proposal of 22no. dwellings.

In summary, the response confirmed that the principle of residential redevelopment is acceptable but raised concerns over the design and appearance of the scheme. The response also highlighted technical and environmental requirements for any subsequent planning application which are dealt with by the accompanying reports. The pre-planning response can be found at appendix 4.

In summary, the pre-app scheme submitted was not considered sympathetic to the neighbouring properties in terms of its height or design. It was considered that the staggered frontage and height has no relationship with the existing heights of the neighbouring properties on either side and it would be significantly higher than both neighbouring properties.

Its flat roof design it was an incongruous addition within the street that is not considered to respect the scale of the surrounding properties. Any future scheme would need to respect building lines of the existing residential developments along this part of Elgar Road South and the levels should create a gradual transition from the two storey semi-detached dwellings to the south towards the three-storey block of flats to the north.

In terms of its impact on neighbouring properties. Overall, it was considered that the size of the proposal will be visually dominant and overbearing on neighbouring properties and due to its height, massing and scale would be harmful to their outlook with potentially some loss of light and overshadowing to the flats to the north. With some loss of privacy and overlooking from the rear facing windows.

Further concerns were raised in relation to the lack of landscaping and amenity space and any planning application would need to demonstrate that the proposed flats have access to a suitable level of daylight and sunlight.

Having regard to the above, the scheme was reduced to 18 units. An application was validated under reference 21/0526 and refused in December 2021 as outlined above.

Planning Policy Framework

Section 38(b) of the Planning & Compulsory Purchase Act 2004, requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The statutory development plan for the purpose of this application consists of the National Planning Policy Framework (NPPF) (2019), the Reading Borough Local Plan (SDLP) (2019) and Sites and Detailed Policies Document (SDPD). The policies relevant to the application are summarised in the following subsections.

i. National Planning Policy Framework

The current National Planning Policy Framework (NPPF) replaces both the first NPPF published in March 2012 and second NPPF, published in July 2018 and sets out the Government's agenda for planning and growth in England.

Paragraph 4 outlines the central objectives of the Framework, which includes a 'social objective' to support the health and well-being of communities.

Paragraph 7 sets out the purpose of the planning system as being the contribution to achieving sustainable development. The objective of sustainable development is to meet the needs of the present, without compromising the ability of future generations to meet their needs. In achieving sustainable development, there are three, interdependent objectives: an economic objective; a social objective; and an environmental objective. Whilst these objectives should be used to guide development towards sustainable solutions, local circumstances should be considered to reflect the character, need and opportunities of each area.

At the core of the NPPF is the presumption in favour of sustainable development, where it is advised that plans and decisions should apply a presumption in favour of sustainable development (para.11). For decision-taking, this means that development proposals should be approved without delay if they are in accordance with an up to date development plan. Where there are no relevant development plan policies, or they are out of date, permission should be granted.

Section 4 of the NPPF advises authorities to approach decisions on applications in a positive and creative way and that applications for sustainable development should be approved where possible. Paragraph 39 encourages early engagement to improve the efficiency of the planning application process. This allows many issues to be resolved at pre-application stage, including improvement to infrastructure and affordable housing.

The revised NPPF continues to reinforce the Government's emphasis on significantly boosting the supply of housing and is intended to prompt significant change in the delivery of housing to rectify the housing crisis. The emphasis on the delivery of housing in sustainable locations also remains.

Section 11 focusses specifically on promoting the efficient use of land. Paragraph 117 states as follows in relation to "previously developed" or "brownfield" land. "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"

Paragraph 118 (c) provides further support for this approach as follows:

“Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”

[Reading Borough Local Plan](#)

The RBLP was adopted in 2019 and is the current Plan for Reading Borough. The RBLP establishes the framework of detailed policies and proposals for the control, development and use of land, with which planning decisions will be assessed. The following policies are relevant to the application site in the context of the proposed development.

- CC1 Principle in Favour of Suitable Development Policy
- 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)
- EN9 (Provision of Open Space) • EN12 (Biodiversity and the Green Networks)
- EN16 (Pollution and Water Resources)
- EM3 (Loss of Employment Land)
- H1 (Provision of Housing)
- H2 (Density and Mix)
- H3 (Affordable Housing)
- H5 (Standards for New Housing)
- H10 (Private and Communal Outdoor Space)
- TR1 (Achieving the Transport Strategy)
- TR3 (Access, Traffic and Highway Related Matters) TR5 (Car and Cycle Parking and Electric Vehicle Charging)

[Supplementary Planning Documents](#)

4.11 The following supplementary planning guidance is relevant to the application site in the context of the proposed development.

- Sustainable Design & Construction SPD (2019)
- Revised Parking Standards and Design SPD (2011)
- Revised SPD on Planning Obligations under Section 106 (2015) Affordable Housing SPD (2013)
- Employment, Skills and Training (2013) Tree Strategy for Reading (June 2010)

Proposal

In full, the application seeks planning permission for the demolition of an existing single storey building and the erection of a new 3.5 storey building comprising 16 no. homes, together with associated access, parking and landscaping.

The existing site access will be retained and enhanced to provide a shared surface to serve the proposed development. Parking and circulation is provided to the rear to replicate the existing situation.

The proposal retains a landscaped frontage to Elgar Road South and shared amenity space provided to the rear of the building.

Planning Considerations

Having reviewed the relevant planning policies at both national and local levels together with the pre-application advice received from Officers, we consider that the key issues in the determination of this planning application are:

- The Principle of Residential Development;
- Loss of Employment;
- Impact on Residential Amenity;
- Sustainability Measures;
- Housing Mix, Density & Affordable Housing;
- Contamination;
- Landscape & Ecology;
- Flood Risk & Drainage;
- Waste Storage & Collection;
- Access, Parking & Cycle Storage;
- Security;
- Design;

Common ground

Having regard to the reasons for refusal and the assessment of the previous application, there are several issues we feel do not need re visiting as part of this appeal.

In the assessment of the original scheme the Council has raised no issues regarding:

- The principle of residential development;
- Loss of employment;
- Housing mix;
- Contamination;
- Access and vehicle parking;
- Waste storage and collection;
- Flood risk and drainage.

Furthermore, reason No. 6 can be addressed by the submission of a viability assessment which has been submitted with this application.

Condition 7 can be addressed via a legal agreement which is currently being prepared. This will be submitted during the course of the application.

This planning statement will focus on the remaining 5 reasons for refusal as outlined. The reasons for refusal refer to the following planning considerations:

- Design;
- Impact on the character of the area;
- Landscaping;
- Security;
- Sustainability.

REASONS FOR REFUSAL

Reason No. 1

'By reason of its excessive scale, height and massing, the proposed development would be overly-dominant in the streetscene of this part of Elgar Road. It would be particularly out of scale with and overbearing to the pair of semi-detached houses at 224/226 Elgar Road. The flank walls of the blocks would be long, tall and given the gaps in the streetscene would be very noticeable and harmful, particularly given the protruding elements which are not harmonious with the main block. In addition, the design fails to provide a sufficient landscaped setting for the large building. For the above reasons, the proposal is considered to be an overdevelopment and a poor design response which fails to respect the prevailing urban grain and would be harmful to the streetscene of Elgar Road (South) and the abrupt step-change in height/scale to 224/226 Elgar Road would be harmful to Waterloo Meadows through intensive adjacent development, contrary to policies CC7 (Design and the Public Realm) and EN7 (Local Green Space and Public Open Space) of the Reading Borough Local Plan (2019)'.

Response – overcoming the reason for refusal

The western side of Elgar Road is residential in terms of land use context and character. The site occupies a transitional point in this character area, between more traditional two storey housing to the south and 3.5 storey flatted development to the north. At present, the single storey flat-roofed commercial building is at odds with every aspect of this context. The removal of the existing building will only have a positive impact on the surrounding area.

The reason for refusal begins by stating that, *'By reason of its excessive scale, height and massing, the proposed development would be overly-dominant in the streetscene of this part of Elgar Road'*.



Proposed street scene

The Street Scene provided shows that this is simply not the case. The proposed ridge height would be lower than the property to the north. The massing has been greatly reduced by the removal of the flat roofed roof from the original 18 unit scheme.

Again, in comparison with the neighbouring property to the north, the massing and height of the proposal cannot be considered out of keeping with the surrounding area.

'It would be particularly out of scale with and overbearing to the pair of semi-detached houses at 224/226 Elgar Road'

It is acknowledged that the height is greater than that of the houses to the south, but this relationship was a key consideration in the design process. By keeping a significant separation

distance to these properties, reducing the depth of the flank elevation and by virtue of the two storey section proposed to the south, this ensures that the proposal will not have an overbearing impact.

The flank wall has been designed to respect the property immediately to the south. The location of the neighbouring properties to the south also ensures that there is no loss of light or overshadowing.

It is also worth noting that no objections have been received from the owners/ occupiers of No's 224 or 226 to the original scheme.

The garden of No.224 is set back of the main two storey element by a conservatory and it is enclosed on the northern boundary by an existing outbuilding. Looking at the siting/scale of the proposed building in relation to this context, the rear building line of the proposed two storey element (already stepped down at this point) is broadly aligned with the conservatory. Notwithstanding compliance with the 45 degree angle, the massing of the proposed building does not feature in more obscure views from the primary amenity space immediately to the rear of No. 224. The remainder of the garden for No. 224, which is substantial, is completely unaffected proposal given this relationship.

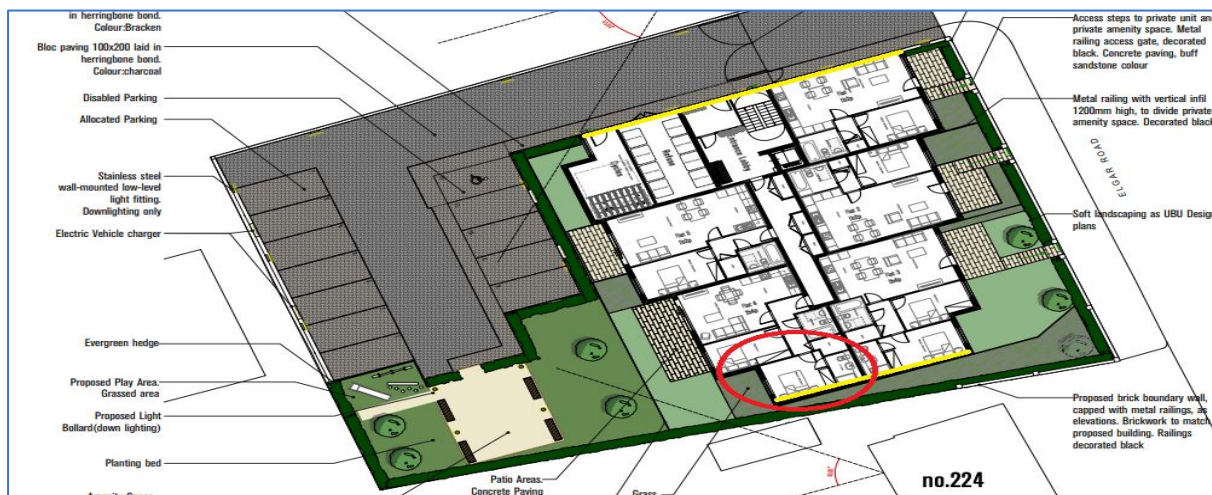
The other fundamental point here is that the outlook for No.224 is clearly west towards Waterloo Meadows for two reasons – firstly, that is the orientation of the garden, and secondly occupiers will naturally manage the layout and use of the external amenity area to create views/outlook to the area given that it forms an attractive landscaped backdrop.

Nevertheless, the southern section of the scheme has been reduced to part single storey where the development gets closer to the neighbouring boundary. This change will ensure that the proposal will not be overly dominant when viewed from the neighbouring properties.

The reason goes on to state that:

'The flank walls of the blocks would be long, tall and given the gaps in the streetscene would be very noticeable and harmful, particularly given the protruding elements which are not harmonious with the main block'.

We do not understand how both flank walls can be considered in the same light as the depth, height and design of each flank is very different – please see below.



Flank walls highlighted in yellow – area circled has been reduced from 2 storey to single storey

The southern flank is significantly smaller in depth and height as shown on the image above.

The northern flank would be tall, but this needs to be considered against the immediately adjoining property to the north. When assessed against this property, it cannot be considered out of keeping.

We do not understand what the officers are saying when they say that the protruding elements of the building not harmonious with the main block. We have assumed that they are referring to the staggered building line being different to the design of the remainder of the street scene.

If this is the case, it is considered that the staggered building line provides a greater level of interest to the street scene rather than the bland elevation of the block of flats to the north of the site which are fronting onto the street scene.

The staggered building line offers a far more interesting front façade than the surrounding properties and the space to the front allows a landscaped setting to be provided for the building which adds further colour and interest to the area. This should be welcomed in our view.

The reason for refusal goes on to state *'In addition, the design fails to provide a sufficient landscaped setting for the large building'*.

To address this issue, we have amended the internal layout of the ground floor units such that the front facing units will now be accessed from the front of the property – please see below:



Revised treatment of the front of the site with individual accesses to the ground floor units

This allows the front space to be maintained open which improves the landscape setting for the building and provides great levels of security for the ground floor flats and the property in general.

The reason for refusal concludes:

'For the above reasons, the proposal is considered to be an overdevelopment and a poor design response which fails to respect the prevailing urban grain and would be harmful to the streetscene of Elgar Road (South) and the abrupt step-change in height/scale to 224/226 Elgar Road would be harmful to Waterloo Meadows through intensive adjacent development, contrary to policies CC7

(Design and the Public Realm) and EN7 (Local Green Space and Public Open Space) of the Reading Borough Local Plan (2019)'.

Please see below and aerial which shows the urban grain referred to in this reason for refusal.



Sites relationship with Waterloo Meadows

It is stated that the proposal is a poor design response which fails to respect the prevailing urban grain. Please see image above which shows the 'urban grain' which consists of blocks of flats to the north of a similar scale to the proposal, two storey houses to the south, and industrial uses to the east. Having regard to the most recent development in the area, to the north, the proposal cannot be said to be out of keeping.



View from the west of the site from Waterloo Meadows

The proposal states that there the abrupt step-change in height/scale to 224/226 Elgar Road would be harmful to Waterloo Meadows through intensive adjacent development. Again, please see image above which shows 3 and ½ Storey blocks of flats built immediately adjacent to Waterloo Meadows to the north of the site – circled in yellow.

Our scheme is separated from Waterloo Meadows by virtue of the pair of semi-detached dwellings to the west and the car parking area immediately to the west of the building. The blue line illustrates the rear building line of the proposed development. Therefore, the proposal is keeping a significant separation distance to ensure there would be no adverse impact on Waterloo Meadows.

We have amended the scheme to reduce the height of the two storey element to the south of the site. This is now part two storey/ part single storey and this addresses the issue raised with regard to the overbearing impact on No. 224.

The images provided above clearly demonstrate that the height of the proposal accords with the height of the immediately adjoining properties and that the separation distance to Waterloo Meadows ensures that there is no adverse impact on the setting of the park.

Having regard to the above, we feel that the first reason for refusal has now been addressed.

Reason No. 2

'The development proposes a layout with flats to the front and rear of the site accessed by a side entrance door leading to a long corridor and stairwell. This is a poor and insecure choice of layout with no legible front door/entrance feature and instead the communal door is approached along a secluded side vehicle access. The entrance door would be a narrow and unwelcoming entrance with no overlooking from habitable windows in the development and dwarfed in scale and importance by the adjacent bin store doors. The above design flaws would fail to create a safe and accessible environment, where crime and disorder or fear of crime can undermine quality of life or community cohesion for future residents, contrary to Policy CS7 (Design and the Public Realm) of the Reading Borough Local Plan (2019)'.

Although the building form has stayed the same the access to the property has changed significantly from the original scheme:

The ground floor flats to the front of the property will now have individual accesses which improves the security to the front of the property and provides an improved landscape to the front of the building – please see below:

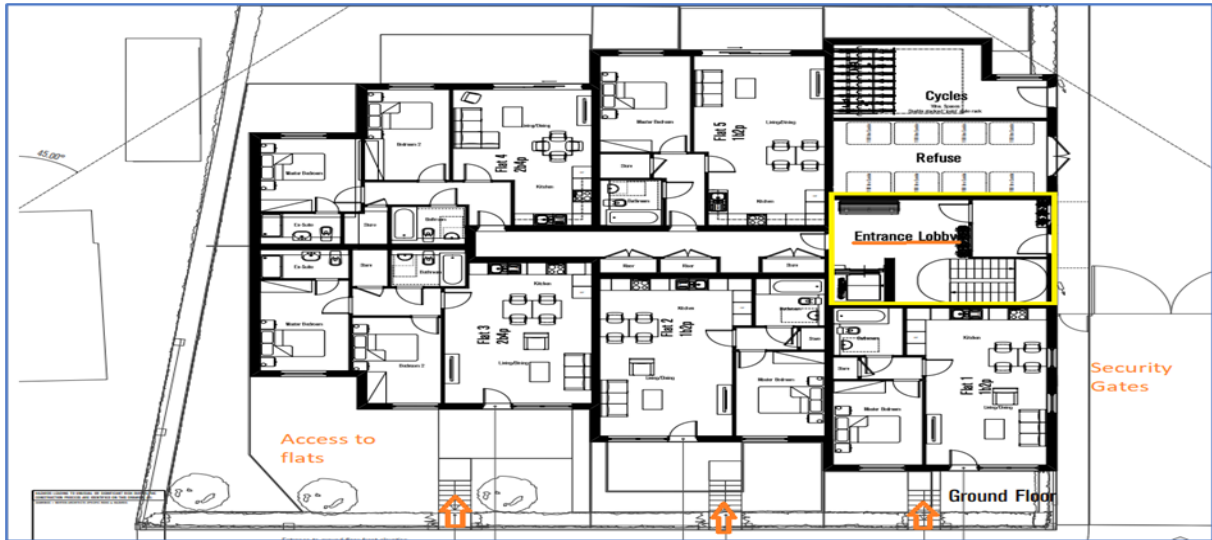


Access points to the front of the ground floor units

The side access has been amended such that security gates have been added and an entrance lobby created to improve this entrance – Please see images above and below.



Side access security gate and access points to the ground floor units



Revised ground floor layout with designated entrance lobby

Security cameras and motion censored lighting to the front will serve to secure the area in front of the security gates.

The entrance door to the side was previously considered narrow and unwelcoming and dwarfed in scale and importance by the adjacent bin store doors. The new lobby area has addressed this issue and creates a more friendly opening to the property as required by the Council.

The area the front of the property will be lit via motion sensors and overlooked by the side facing windows of the proposed building, the side facing windows of the building to the north, and it will be open to constant surveillance from passers by as well.



Windows to the south of the neighbouring property which overlook the access road

Having regard to the above. The design has been amended to overcome the previous concerns and it would now provide a safe and accessible environment, for future residents in line with Policy CS7 (Design and the Public Realm) of the Reading Borough Local Plan (2019)'.

Reason No. 3:

'The layout with the internal entrance corridor results in the ground floor flats facing the streets being provided with patios and amenity spaces fronting the street. This is not a characteristic of the area and would become a poor design solution, as these areas will be inhabited, personalised and defended at ground floor level as private gardens. Further, there may be pressure for residents to seek high secure fencing and with the stepped building line and patios to the front will produce a cluttered streetscene. The cluster of Juliet balconies proposed on the front elevation will add to this cluttered appearance. These aspects of the design would fail to respond positively to the local context and character and therefore would be harmful to the streetscene, the amenities of the area and provide unacceptable living conditions for the occupiers of the development, contrary to policies CC7 (Design and the Public Realm), CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019) and H10 (Private and Communal Outdoor Space) of the Reading Borough Local Plan (2019)'.

The front of the property has been amended to address the concerns raised in terms of security and landscaping. Each of the front facing ground floor flats have been given their own entrance which keeps this space open.

The client is happy to remove the patio areas to the front if required and amend such that residents can only have access rights over this space rather than have the space as private amenity.

There is a landscaped area to the front of the property at present, therefore the provision of landscaping to the front is not out of character with the surrounding area.

The retention of the landscaped area to the front also serves to give some degree of privacy to the occupants. The Inspector will note that the development immediately to the north is located much closer to the highway and as a result passers-by can see straight into the front facing units resulting in a lack of privacy. This is something that we sought to avoid.

The reason for refusal goes on to state that:

'there may be pressure for residents to seek high secure fencing' and 'the cluster of Juliet balconies proposed on the front elevation will add to this cluttered appearance. These aspects of the design would fail to respond positively to the local context and character and therefore would be harmful to the streetscene'



Current street scene

Please see the image above from google maps which shows the current street scene with:

- Greenspace to the front of the subject site;
- Security fencing to the front of the property next door;
- Juliet Balconys to the front elevation of the property next door.

It is clear from the image above that the design has responded positively to the local context and character of the area. We have taken design cues from the neighbouring properties in terms of the Juliet balcony's.

Furthermore, the front facing gables which are a feature of the property to the north, and front facing gables are also found to the bay window element of No's 224 and 226, yet this has not been acknowledged in the assessment of the proposal previously.

Should the Council still have an issue with the Juliet Balcony's, the client is happy to omit this from the design.

The design has now been amended to address the previous concerns raised in relation to the local context and character.

Reason No. 4

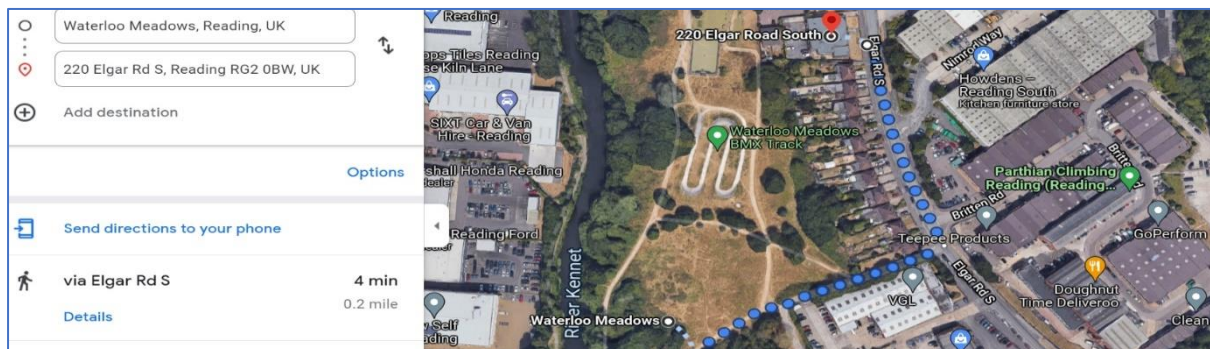
'The proposal would be substandard in terms of amenity space for the number of flats, which is not reflective of the context of development in the vicinity. Due to the amount of site coverage by the proposed flats and the amount of parking proposed there is limited opportunity for secluded landscaped amenity space to be provided to serve the future residents. For these reasons, the proposal would fail to provide a suitable level of landscaping or amenity space for the development, contrary to policies CC7 (Design and the Public Realm), CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Local Plan (2019)'.

The requirements as set out in policy H10 are as follows:

- 1 and 2-bedrooms - 25 sq m per flat, and
- 3 or more bedrooms - 40 sq m per flat.

The target is 340sqm against provision of 425sqm on a site adjacent to existing POS. What is being sought through Policy H10 is a general requirement across the plan area not taking into consideration the context of each site. This is acknowledged at paragraph 4.2.40 of the Local Plan, which states (my underlining for emphasis) "Policy H10 seeks to secure private and communal outdoor amenity areas on all residential developments, the extent of which will be guided by the site's proximity to quality public open space.

Please see below the sites proximity to Waterloo Meadows.

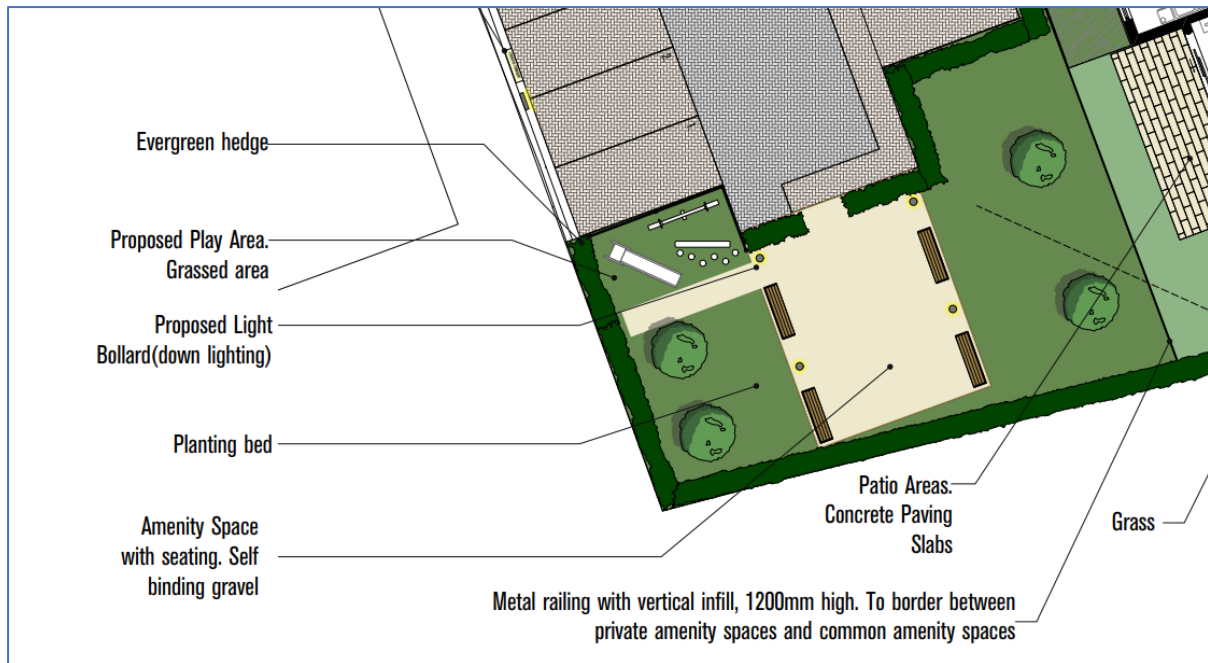


Proximity to Waterloo Meadows – 4 min walk

Having regard to the policy compliant open space provision, and the sites location adjacent to Waterloo Meadows, the level of open space provided is considered to be acceptable in this case.

We note that a contribution was required to address the shortfall in amenity space as well. Should the Council still feel that the amenity space is insufficient, the client is happy to pay the financial contribution.

However, if this is the case, it is considered that the amenity space to the rear of the site, which is a suitable for daily use by occupants, should be discounted from any such financial contribution.



Amenity space to the rear

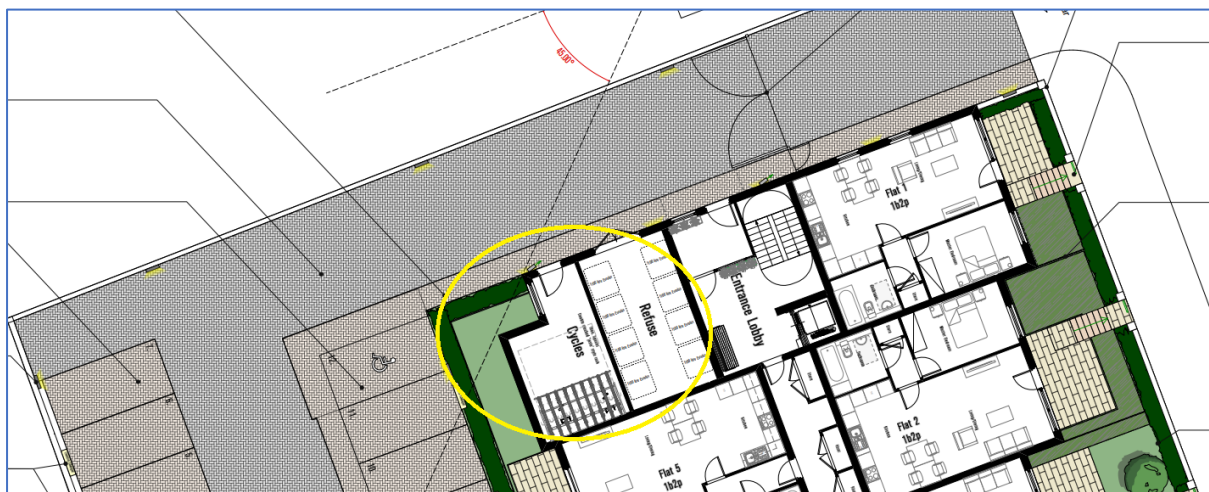
Previously the cycle stores were located to in this space, but the cycle spaces will not be located within the building, thus improving the amenity space significantly.

The amenity space, as shown above, now has a small play area and a seating area which is completely overlooked and secure. This is a significant improvement from the original scheme.

Reason 5

'The cycle store shown is substandard in terms of dimensions and capacity and is in a secluded location, at risk of break-ins. The location and design of the cycle store is therefore unacceptable as it would not provide sufficient, useable cycle parking and it would fail to create a safe and accessible facility, contrary to policies TR5 (Car and Cycle Parking and Electric Vehicle Charging), CC7 (Design and the Public Realm of the Reading Borough Local Plan (2019) and the Council's adopted SPD, 'Revised Parking Standards and Design' (2011)'.

The cycle store has been amended and it is now internal to address this issue. Please see image below.



Conclusion

We strongly believe that the revised scheme enhances the appearance of the site and maximises the development potential of this sustainably located brownfield site.

The removal of the large area of flat roof addresses the initial design concerns relating to massing and scale and the adverse impact on the street scene.

The separation distance maintained to the neighbouring properties in conjunction with the technical reports submitted in support of the application illustrate that there will be no adverse impact on the amenity adjoining neighbours.

The proposal will provide 16 dwellings to meet the Councils housing targets and we cannot see any valid planning reason to refuse this application.

Having regard to the above, we feel that the previous reasons for refusal have been overcome and that the proposal is acceptable.