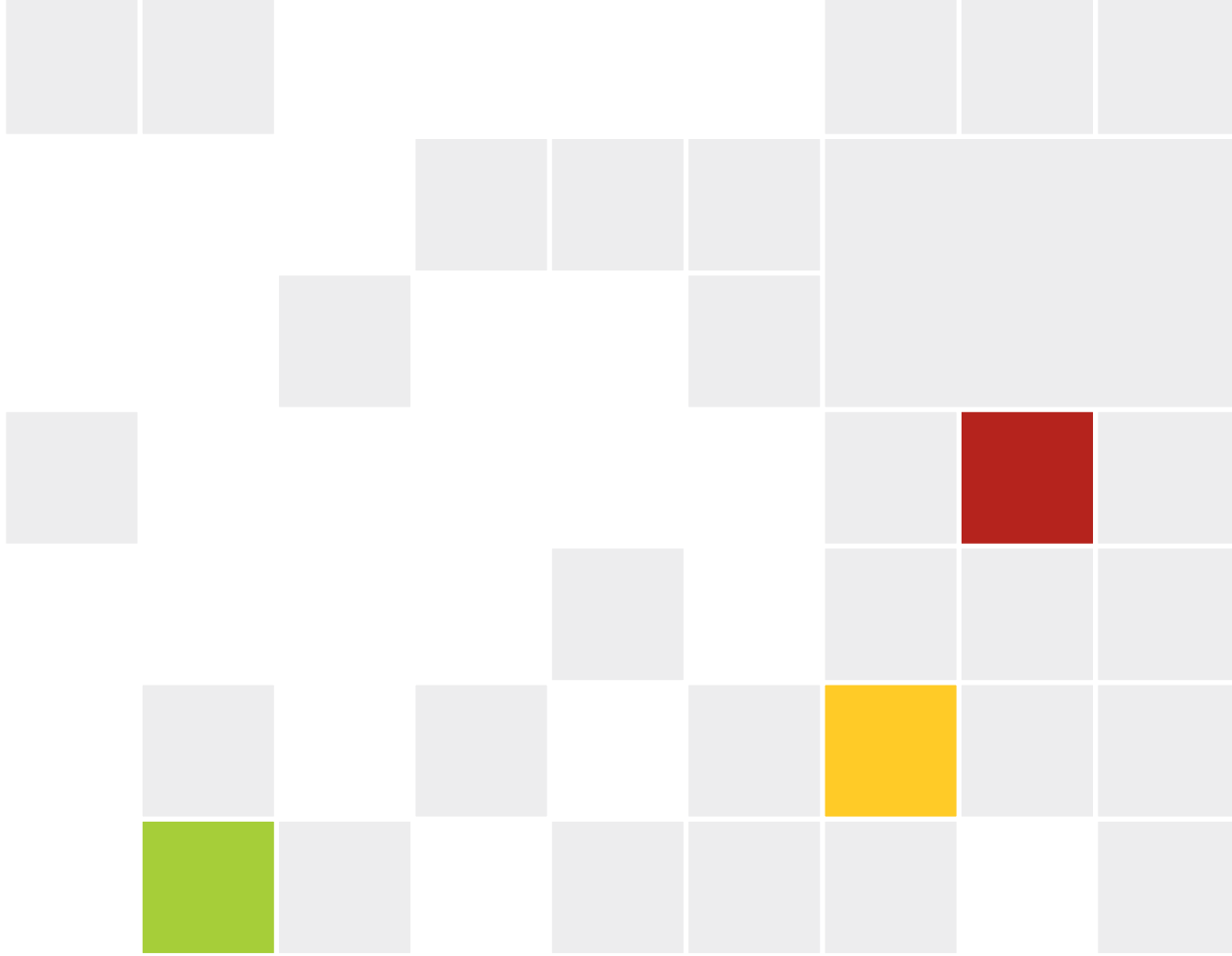
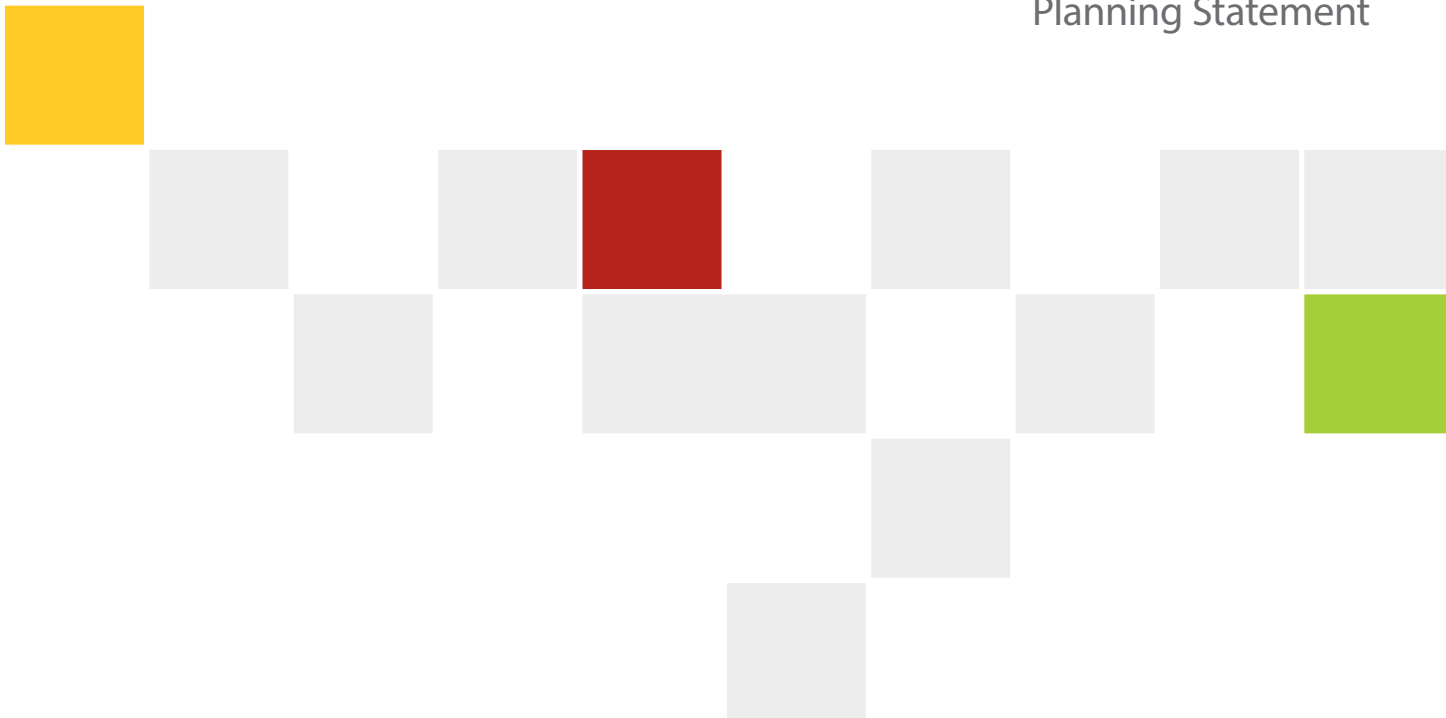




2 – 4 Send Road, Caversham, Reading

Planning Statement



Boyer

Report Control

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APPENDIX

Appendix One – Site Location Plan

Appendix Two – Pre-Application Response

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Boyer on behalf of Raywood Developments Limited ('the applicant') in support of a full planning application to redevelop 2-4 Send Road, Caversham, Reading ('the site'). The existing Site Location Plan is attached at **Appendix 1**. This Statement should be read in conjunction with all supporting documents and reports submitted with the application.
- 1.2 The application site falls within the administrative boundary of Reading Borough Council ('RBC'), which is also the Local Planning Authority ('LPA'). As such, the proposals are to be considered against its adopted Development Plan and any other relevant material considerations.

Description of the Development

- 1.3 The description of proposed development, as set out on the accompanying application form, is as follows:

"Demolition of the existing buildings and the erection of 9 new houses with associated parking and landscaping at 2-4 Send Road, Caversham, Reading"

Accompanying Documentation

- 1.4 A full list of all the supporting documentation and drawings is provided in the covering letter which accompanies this application.

Structure of this Planning Statement

- 1.5 This Planning Statement is structured as follows:
- **Section 2** sets out the context for the proposed development, including a description of the site, its surroundings, and planning history;
 - **Section 3** provides an overview of pre-application discussions with RBC and a description of the proposed development;
 - **Section 4** provides an overview of local development plan policy and national policy guidance considered relevant to the determination of the application;
 - **Section 5** provides an assessment of the proposed development against the identified development plan planning policy framework, other material considerations and relevant legislation; and
 - **Section 6** provides a summary of the application and the planning benefits of the scheme.

2. SITE AND SURROUNDING AREA

The Site

- 2.1 The application site is approximately 980m² in size and comprises 2 and 4 Send Road. These buildings are situated at the northern end of Send Road in close proximity to the junction with Gosbrook Road.
- 2.2 Number 2 Send Road comprises a residential dwelling in the form of a single storey bungalow, whilst Number 4 Send Road consists of an existing light industrial unit. The light industrial structure is in a poor state of repair that detracts from the character of the area.
- 2.3 Both properties are accessed from Send Road but their plots extend to terminate at the boundary with Forge Close to the east. The boundaries of both properties within Forge Close currently comprise low lying close boarded fencing, resulting in the rear of the buildings being highly visible within this streetscape.
- 2.4 The site lies within the setting of Ivy Farmhouse, which is a Grade II Listed Building situated on the Gosbrook Road and also within an Air Quality Management Area ('AQMA').
- 2.5 As set out in the accompanying Flood Risk Assessment ('FRA'), the application site is located wholly in Flood Zone 3.

Surrounding Area

- 2.6 Caversham is a suburb of Reading stretching from the River Thames up to the lowest reaches of the Chiltern Hills. Named areas include Emmer Green, Lower Caversham, Caversham Heights and Caversham Park Village. The site sits within Lower Caversham which has no formal boundary but the name usually refers to the part of Caversham situated on lower ground to the east of central Caversham, close to the river Thames.
- 2.7 The area comprises of primarily residential development with some light industrial units located to the east. Services within the area include several primary schools and nurseries, Tesco Extra, bars and restaurants, children's centre, doctor's surgery, a range of different shops, and multiple recreational grounds and parks.
- 2.8 Reading train station is approximately 1.5km away from the site, providing quick direct routes into London Paddington. There is a bus stop approximately a 4 minute walk from the site which provides regular services into the centre of Reading in less than 10 minutes.
- 2.9 Send Road provides access to several residential properties as well as a number of light industrial units, two of which sit directly adjacent to the north and south boundary of the site, another directly opposite. The road leads to more residential housing and a vehicle repair centre further south and terminates here, providing no through route.

- 2.10 Forge Close provides access to a residential cul-de-sac containing a bungalow (399 Gosbrook Road) and a terrace of five three storey townhouses. There is a large area of hardstanding to the front of the dwellings providing a turning head and informal car parking due to no parking restrictions in place.
- 2.11 To the north east of the site on Gosbrook Road, lies Ivy Farmhouse (the mentioned Grade II Listed Building) which has been carefully considered within the design development of the site.

Planning History

- 2.12 The following planning applications have been previously determined at 4 Send Road:
- *Ref 980466*: Use of the site for a light industrial, B1 use. Approved April 1998;
 - *Ref 040353*: Retrospective application for alterations to existing lean-to at rear and retention of new double-doors in front and rear elevations. Approved December 2008; and
 - *Ref 140583*: Single-storey rear extension for new store and carport. Approved June 2014
- 2.13 The following planning application has been previously submitted in relation to 2-4 Send Road:
- *Ref 190980*: Demolition of 2 & 4 Send Road. New Development comprising of 14x1 bed flats and 2x2 bed flats. Access proposed from Send Road & Forge Close. Withdrawn March 2020. This application was submitted by a different applicant.
- 2.14 It is noted that the following planning application has also been submitted at 389 Gosbrook Road which sits immediately to the north of the application site providing relevance to this application. Details are provided below:
- *Ref 210279*: Demolition of existing building and erection of new building containing 6 flats with associated car parking and landscaping. Pending Determination.
- 2.15 Whilst this may not be approved or even implemented, the design of proposed development has had regard to this application, should it come forward to ensure both schemes are compatible.

3. PROPOSED DEVELOPMENT

- 3.1 This section summarises the applicant's pre-application engagement with RBC Officers as well as the proposed development encompassed in this application.

Pre Application Advice

- 3.2 As part of the design and evolution of the proposed scheme, the applicant has engaged in pre-application discussions with Officers from RBC.
- 3.3 A written response to a formal pre-application advice request was received from RBC on 24th June 2021, attached at **Appendix 2**.

- 3.4 The response confirmed that the principle of the loss of employment land was considered acceptable and in general the principle of residential development acceptable, given the residential context of the site and surroundings. RBC's Conservation and Urban Design Officer confirmed that the general design of the development was of a high quality and the impact on the setting of the listed building would be acceptable. RBC Officer's confirmed:

"In terms of design it is clear that this has been carefully considered and officers consider that although different to other developments in the vicinity it is an interesting scheme, which has the potential to improve the character and appearance of the site and the surrounding area. The materials and detailing proposed are considered to be of a high quality and create an attractive scheme"

- 3.5 The Officers pre-application response also confirmed there would not be a detrimental impact on neighbouring amenity as no side elevation windows were proposed and *'Due to the orientation of the proposal there is not considered to be any harm in terms of loss of sunlight'*.
- 3.6 In terms of future occupant's privacy, the Officers accepted that the back to back relationship and distance between the proposed houses was acceptable and privacy would not be impacted. The advice also noted that dwellings met the proposed National Space Standards and through the Daylight and Sunlight Assessment, the scheme performs well and ensures adequate sunlight in each plot is achieved. The Officer concludes, *'Through design the proposal has demonstrated that there would not be a detrimental impact on privacy for future residents of the houses at Send Road or Forge Close'*.
- 3.7 RBC Officers also identified the positive *'greening solutions'* that the scheme included, which have been bolstered and amplified in this submission. In addition, Officers noted that the scheme offered opportunities to enhance wildlife on the site, which the proposed landscaping scheme has implemented (bat and bird boxes integrated into the building).
- 3.8 RBC Officers noted that there were matters that would need to be considered including car parking provision and occupant amenity space. Amendments have been made to the design of the scheme and these matters are addressed in the accompanying Design and Access Statement ('DAS') and throughout this report.

3.9 In response to the pre-application feedback from the Council Conservation and Urban Design Officer regarding overall height, bulk and scale of the dormer windows, changes to the scheme include:

- Reducing the overall height of the buildings, including a flat roof section at the ridge of the Send Road houses (which has also enabled additional photovoltaic panels to be added);
- Changes to all the dormer windows on both sets of houses to a more traditional, subservient approach, greatly reducing bulk and massing, with the dormers set back from the gutter line and tile clad to blend into the roof;
- Removal of on edge brick detailing, and replacing with contrasting colour brick patterns around windows, in keeping with the terraced housing vernacular in the area.

Other key design changes in response to the pre-application feedback include:

- Additional permeable paving in a contrasting colour along the Send Road frontage to better define the site boundary;
- Addition of rear elevation windows to add interest and additional daylighting, but specified as obscure/high level so as not to impact privacy; and
- Sedum roofs upgraded to biodiverse green roofs. In response to Council concerns regarding the maintenance of green roofing of the pitch roof this element has been removed. The remaining green roof areas are on easily accessible single storey flat roof areas and stores which will accordingly be straightforward to maintain.

Proposed Development

3.10 Following RBC's issued pre-application advice, this application seeks the comprehensive redevelopment of 2 – 4 Send Road in order to deliver 9 houses, with associated works. The description of development is as follows:

“Demolition of the existing buildings and the erection of 9 new houses with associated parking and landscaping at 2-4 Send Road, Caversham, Reading”

3.11 The proposal is a high quality design that respects local vernacular and the neighbouring Grade II Listed Building; making a positive contribution to the street scene and surrounding area.

3.12 The proposal consists of 7 x 3 bedroom and 2 x 2 bedroom houses creating two street frontages. Four of the proposed homes front Send Road, whilst the other five front Forge Close. The units fronting Send Road comprise 4 x 3 bed units, whilst the units fronting Forge Close comprise 3 x 3 bed units and 2 x 2 bed units.

- 3.13 All of the houses are 2.5 storeys in height, with a bedroom provided in the roof space for the 3 bedroom units alongside an associated dormer window to the front of the property. Following comments from RBC Officers in the pre-application response, the overall massing and height of the proposed buildings have been reduced. This has been achieved through amendments to the roofline, along with the introduction of a more subservient traditional dormer which replaces the previously proposed larger brick framed windows. This ensures that the development reads more easily as a two-storey terrace, in keeping with the prevailing residential grain and character of the wider local area.
- 3.14 A careful design approach has also been taken for the rear elevations, ensuring that openings serve only bathrooms and functional circulation spaces (non-habitable rooms) where window finishes are proposed to be obscured or openings contained at a high level. This will ensure the privacy of future occupants.
- 3.15 Each house proposed will be provided with private rear amenity space of approximately 35-40m². The Send Road houses also feature a balcony providing further private amenity space. The houses have all been designed to meet the appropriate internal space standards, water efficiency standards, emission rates and accessibility requirements.
- 3.16 Cycle and car parking will be provided, with 8 of the houses each having a car parking space, all houses having 2 cycle spaces per dwelling to the front of the dwellings and additional cycle spaces in the garden mobility stores. Census data demonstrates that households within the local area on average only have a single car per household. Accordingly, the level of car parking provision proposed is appropriate having regard to local ownership levels and high levels of accessibility of the location to local services, places of employment, Caversham and Reading town centres, and Reading Station.
- 3.17 The proposed dwellings on Send Road have integral garages, whilst the dwellings on Forge Close will have off-street driveway car parking, in keeping with the existing houses 1-5 Forge Close. One unit on Forge Close (no.9) will have no on plot car parking, albeit there is a parking space for a motorbike or electric motorcycle (along with accompanying security ground anchor). This property will be one of the 2 bedroom dwellings, which will be marketed with no car parking provision and therefore, will be self-enforcing in terms of parking demand. In addition, Census data identifies that locally 25% of households do not have a car and as such there is already a local precedent and demand for car free dwellings.
- 3.18 Cycle storage will be provided within the integral garages of the Send Road properties and in storage units provided to the front of the properties for the Forge Close units. Additional mobility storage is accommodated within the private garden spaces, which would easily double the storage provision to 4 or more cycle spaces per unit or be utilised for other transport storage, such as electric scooters. This greatly exceeds the policy requirement, and seeks to benefit from the highly accessible location of the site.
- 3.19 Each property has a dedicated waste and recycling bin store to the front of each dwelling, which comply with existing RBC requirements, including the recently adopted food waste recycling service. These stores will also feature green roofs.

- 3.20 Green roofs and photovoltaic panelling are incorporated into the proposed development alongside electric vehicle charging facilities to all units to maximise resistance and resilience to climate change in accordance with RBC policy. In line with EA guidance the finished floor levels have been raised with a flood void below the footprint to ensure the buildings flood resilience and increase flood storage on the site. Furthermore, the proposed development accords with RBC's sustainable design and construction requirements.

4. PLANNING POLICY CONTEXT

- 4.1 This section provides a summary of the relevant planning policy framework against which the proposed development has been prepared and against which it should be determined.

The Development Plan

- 4.2 The LPA's Development Plan, given its statutory status, is the starting point when considering planning applications. Section 70 (2) of the Town and Country Planning Act 1990, states that the local planning authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where regard is to be had to the Development Plan in the Planning Acts, and confirms that applications for planning permission must be determined in accordance with the Plan, unless material considerations indicate otherwise.
- 4.3 The Development Plan relevant to this application comprises the Reading Borough Local Plan ('RBLP'), adopted in Nov 2019.

Reading Borough Local Plan (Nov 2019) ('RBLP')

- 4.4 The RBLP was adopted in November 2019 and sets the policies for development in Reading up to 2036. It pre-dates the most recent revision of the National Planning Policy Framework ('NPPF'), updated in July 2021. Whilst not replacing the Development Plan as the starting point for decision-taking, this provides the most up-to-date planning policy guidance, therefore an important material consideration.
- 4.5 The most relevant Development Plan policies to this application are summarised below.
- 4.6 **CC1 - Presumption in favour of sustainable development:** As per the Local Plan and revised NPPF (2021). Planning applications in accordance with the development plan will be approved unless material considerations indicate otherwise.
- 4.7 **CC2 - Sustainable Design and Construction:** Applications which consider the use of natural resources appropriately and efficiently in relation to building design and site layout are considered acceptable. Residential development should include recycling greywater and rainwater harvesting where it is possible to ensure energy and cost efficiency.
- 4.8 **CC3 - Adaption to Climate Change:** All development must demonstrate how their design has incorporated measures intended to adapt to climate change.
- 4.9 **CC5 - Waste Minimisation and Storage:** Development should demonstrate measures to minimise waste before and after construction. This includes sustainable waste management and well-designed spaces which factor waste storage.
- 4.10 **CC6 - Accessibility and the Intensity of Development:** Scale and density of development will relate its level of accessibility, with higher density acceptable in areas with the best accessibility.

- 4.11 **CC7 - Design and the Public Realm:** A high standard of design quality is expected on all developments which maintains and enhances the character and appearance of the local area.
- 4.12 **CC8 - Safeguarding Amenity:** Development will not cause a detrimental impact on the residential amenity of existing properties or impose worse living conditions for new residential properties, as per the specified terms.
- 4.13 **EN1 - Protection and Enhancement of the Historic Environment:** For buildings of historical importance their setting will be protected and where possible enhanced.
- 4.14 **EN12 - Biodiversity and the Green Network:** New development will not impose on existing biodiversity or green network as these areas must be sustained and not lost. Development should endeavour to enhance biodiversity on and around site.
- 4.15 **EN14 - Trees, Hedges and Woodland:** Existing planting should be protected from damage and removal where they are of importance. Provision for tree retention and planting within an application site should be provided by new development, and maintain and enhance the character and appearance of the local area.
- 4.16 **EN15 - Air Quality:** Development should have regard to the need to improve air quality and limit poor air quality on site, especially where sensitive uses, such as residential development, are being introduced.
- 4.17 **EN16 - Pollution and Water Resources:** Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution. Development should anticipate the need for additional infrastructure/mitigation measures to improve and manage conditions during all stages of involvement on site.
- 4.18 **EN18 - Flooding and Sustainable Drainage Systems:** Development will be directed in areas of low flood risk and follow the Sequential and Exceptions Test, "*taking into account the effects of climate change*", as per the NPPF. Flooding from all sources (e.g. surface water) will be considered. Development in high risk flooding areas should be designed to reduce flood risk, both on- and off-site, and will not limit the surrounding areas capacity to store floodwater or impede its flow, as to endanger local life and property.
- 4.19 **EM3 - Loss of Employment Land:** Proposals within the Core Employment Areas should maintain the overall level of employment land. Where a site in a Core Employment Area has no long-term prospect of employment use, exceptions may apply to allow alternate commercial usage that is related or complementary.
- 4.20 **H1 - Provision of Housing:** Provision will be made for at least an additional 15,847 homes (689 homes per annum) in Reading 2013 to 2036.
- 4.21 **H2 - Density and Mix:** Appropriate density of residential development will be informed by:
- Character and mix of uses in local area, with consideration to nearby heritage assets or important landscape or townscape areas;

- Current and anticipated accessibility levels;
- Need to achieve high quality design;
- Need to maximise efficiency of land use; and
- Need to minimise environmental impacts.

4.22 **H3 - Affordable Housing:** Residential development should make contributions towards Reading's affordable housing need. On sites of 5-9 dwellings, a financial contribution will be made to allow the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough.

4.23 **H5 - Standards for New Housing:** New build housing (NBH) should be built to the following standards, unless development is clearly demonstrated unviable:

- NBH outside central area (Proposals Map) should comply with nationally-described space standards;
- NBH will be built to the higher water efficiency standard as per Regulation 36(6) of Building Regulations;
- NBH will achieve a minimum of a 19% improvement in dwelling emission rates over the target emission rate, as per Building Regulations (2013); and
- NBH will be accessible and adaptable in line with M4(2) of the Building Regulations.

4.24 **H10 - Private and Communal Outdoor Space:** Dwellings to provide functional private/communal open space, especially green space, which leaves room for outside activities. Houses will feature private outdoor space, of which the layout and design will respect the size and character of the local area.

4.25 **TR1 - Achieving the Transport Strategy:** All development proposals should make appropriate provision to ensure an adequate level of accessibility and safety by all modes of transport, particularly sustainable modes, in accordance with any agreed transport assessment submitted as part of the application.

4.26 **TR3 - Access, Traffic and Highway-Related Matters:** Development is only permitted where:-

- Access and works to the highway comply with the adopted standards of the Transport Authority;
- Development does not have a detrimental effect on the transport network;
- Proposals would not have a material detrimental impact on the functioning of the transport network;
- Proposals would not be detrimental to the safety of transport network users e.g. cyclists and pedestrians;

4.27 **TR5 - Car and Cycle Parking and Electric Vehicle Charging:** Development should provide car and cycle parking that is appropriate to the accessibility of sustainable transport facilities, particularly public transport. Development should also make the following electric vehicle provisions:-

- All new houses with off-street parking should provide charging points; and
- Within communal car parks for residential developments of 10+ spaces, 10% of spaces should provide an active charging point.

Other material considerations

RBC Supplementary Planning Documents ('SPD's')/Guidance ('SPG's')

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

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

National Planning Policy Framework (NPPF, 2021)

4.29 The revised version of the National Planning Policy Framework (NPPF), published in July 2021, replaces the previous NPPF (2019) and has built upon the principles which were set out in the preceding framework. It provides the overarching planning policy framework against which all local plans and neighbourhood plans should be prepared and against which all planning applications are determined.

- 4.30 The NPPF does not change the statutory status of the development plan as the starting point for decision making but does provide guidance to local planning authorities and decision takers. Therefore, it is an important material consideration.
- 4.31 The NPPF notes that the purpose of the planning system is to contribute to the achieving of sustainable development.
- 4.32 Paragraph 7 recognises the importance of the UK's agreement to commit to the 17 Sustainable Development Goals published by the United Nations (2015). These address social progress, economic well-being and environmental protection.
- 4.33 Paragraph 8 outlines the *'three overarching objectives'* necessary to achieve sustainable development. Highlighting the need for the planning system to perform a number of interdependent roles which are pursued in mutually supportive ways to allow opportunities to secure net gains across each specified objective:

"An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy" (p.5.)

- 4.34 Paragraph 10 (NPPF, 2021) stipulates that sustainable development must be pursued in a positive way and Paragraph 11 states that decisions should apply a presumption in favour of sustainable development. Local planning authorities should approve development proposals that *"accord with an up-to-date development plan without delay"* (p.6.)
- 4.35 In addition to these overarching principles, the NPPF sets out policies in respect of a number of specific topics. It is considered that the following sections of the Framework are of relevance to the proposed development;
- Section 5: Delivering a Sufficient Supply of Homes;
 - Section 8: Promoting Healthy and Safe Communities;
 - Section 9: Promoting Sustainable Transport;
 - Section 11: Making Effective Use of Land;
 - Section 12: Achieving Well-Designed Places;
 - Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change;

- Section 15: Conserving and Enhancing the Natural Environment; and
- Section 16: Conserving and Enhancing the Historic Environment.

4.36 Where appropriate, relevant paragraphs are referred to in the planning assessment, in section 5 below.

Planning Practice Guidance (PPG)

4.37 The PPG is a web-based resource to bring together planning practice guidance for England in an accessible and usable way. It sets out guidance on a wide range of topics, of which the following are relevant to the determination of this application:

- Air Quality;
- Climate Change;
- Consultation and pre-decision matters;
- Design: process and tools;
- Effective use of land;
- Flood risk and coastal change;
- Healthy and safe communities;
- Historic environment;
- Natural environment;
- Open space, sports and recreation facilities, public rights of way and local green space;
- Planning obligations;
- Travel plans, Transport Assessments and Statements; and
- Water supply, wastewater and water quality.

5. PLANNING CONSIDERATIONS

- 5.1 In this section, the planning merits of the scheme are assessed having regard to the relevant Development Plan (see Section 4) and other material considerations, including national policy guidance contained in the NPPF.
- 5.2 Where relevant, this section also summarises the findings of other documentation submitted in support of the application in the context of the relevant planning policy framework. As such, this Statement should be read alongside all the other documents listed in the supporting schedule of documentation in the covering letter.

The Principle of Development

- 5.3 As identified, the application site comprises both residential and light industrial land use. It is proposed to be redeveloped for residential use only, therefore, there are two main considerations in determining the principle acceptability of the scheme. Firstly, whether the site is suitable for additional housing in principle and secondly, the loss of a commercial/employment use on the site. It is of note, that in considering the principle acceptability of the scheme during the pre-application enquiry, RBC Officers have considered the proposal to be acceptable.
- 5.4 Reading Borough Local Plan ('RBLP') policy CC1 broadly reflects the presumption in favour of sustainable development, outlined in paragraph 11 of the NPPF. Policy H1 then sets out the Borough's housing provision, noting a pressing need for at least 689 homes per annum, particularly seeking to utilise previously developed land (PDL), given Reading is a tightly defined urban area. Policy EM3 then goes on to outline that, outside Core Employment Areas (CEA), loss of 'employment land' may be acceptable, depending on the development meeting certain criteria.
- 5.5 In the context of these policies, the site, being part of the residential suburban area of Lower Caversham, is mostly surrounded by residential properties. Therefore, it is well within the built area urban boundaries and part of the site is already in established residential use. The site as a whole would be considered PDL and is not within a CEA.
- 5.6 As such, the site is generally favourable for a residential use, given the development plan makes it clear there is a significant need for new housing and PDL should be utilised. This is consistent with Paragraph 120(c) of the NPPF in, which notes decisions should '*give substantial weight to the value of using suitable brownfield land within settlements for homes*'.

- 5.7 Within the Borough, there has been a growth in the number of households with a rise of 1.3% between 2015 - 2020 and an anticipated increase of 2.1% between 2015 - 2025. The Local Plan identifies a housing requirement of 689 dwellings annually between 2013 and 2036 and indicates that a further 230 dwellings will need to be delivered within neighbouring authorities. RBC's most recent Authority Monitoring Report (AMR) (2020) which is due to be updated in December, indicates that the Council can currently demonstrate 6.67 years of housing supply. However, this has not been based on housing requirement figures that reflect the recently published revised approach to the Standard Methodology for housing requirements in the PPG.
- 5.8 As a major city, Reading now needs to apply a 35% uplift for their housing requirements when determining five year housing land supply. This equates to an estimated requirement for Reading of 876 dwellings per annum. In contrast, the January 2021 Housing Delivery Test results show that in 2019-2020 only 573 dwellings were delivered in Reading that year. This would represent a shortfall of more than 300 dwellings against the new uplift figure. Therefore, it is likely that the housing supply figures will be lower than reported, supporting the benefits of bringing forward additional housing on this site to meet the Council's targets.
- 5.9 Considering these circumstances, it is evident that the development would comply with policy H1 and the Council's housing strategy, in making a positive contribution to housing supply and utilising PDL, within an existing urban area that mostly comprises of other residential properties.
- 5.10 Turning to the loss of commercial/employment space, the criteria required to be considered under policy EM3 is considered below:

Is access by choice of means of transport, including access to the strategic road network poor, and likely to remain poor?

- 5.11 The site is located in close proximity to a high frequency bus corridor and is within walking distance of a range of shops, services and other facilities. The location can therefore be considered highly sustainable and as such, equally appropriate for residential and commercial uses. However, Send Road is not suitable for commercial deliveries or servicing by large vehicles and is situated within an existing residential community, which results in such uses being inappropriate and harmful to existing residents. Commercial uses like this will continue to be unsuitable for a predominantly residential area.

Is the continued use of the site for employment, including the potential for redevelopment for employment use, viable?

- 5.12 The existing buildings are in a poor state of repair and the investment that would be necessary to redevelop the site for commercial purposes is not commercially viable. As identified above, a continuing commercial use at this site is not appropriate given the surrounding residential uses and the associated detrimental impacts on residents' amenities arising from such a use. The site provides the opportunity to provide more compatible residential redevelopment and contribute to a higher quality living environment for existing residents in the area.

Is there a surplus of a similar size and type of accommodation in Reading?

- 5.13 The Council's employment land assessments indicate a surplus of commercial properties. The surplus of employment land has increased during the coronavirus pandemic, and many companies are opting to continue with a greater degree of home working, freeing up further commercial units. On the other hand, the proposed development proposes a scheme of family sized houses, of which there is a shortage in the town. The vast majority of development schemes within such close proximity to the town centre and station are for flatted schemes making this proposal even more beneficial.

Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

- 5.14 The site is located in a mixed use area, but the commercial uses and buildings are of low quality, often also in a poor state of repair and highly energy inefficient structures, which detract from the character and appearance of the area, both in terms of the buildings and their hardstanding, and the nature of their commercial usage – much of which is based around vehicle maintenance. These commercial uses also cause a high degree of harm to the setting of the nearby heritage asset. The current commercial use of 4 Send Road has in particular resulted in numerous complaints to the Council, with noisy and disruptive operations outside of normal working hours, and associated vehicles blocking street parking spaces and impeding the highway and footpaths.

Is the need for alternative uses stronger than the need for the retention of employment land?

- 5.15 The Council has an unmet need for residential development, particularly for family housing, which will increase further in the short term as a consequence of the revised standard methodology inputs. Moreover, the Council benefits from a surplus of employment land, which will also likely increase as a result of the CV-19 pandemic and a shift towards home working. This, combined with the negative impact that the current development has on the character and appearance of the area as well as neighbouring residents amenities, supports that a high quality long term solution of residential development on the site should be welcomed.

Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

- 5.16 2 Send Road is already in residential use, as is much of the surrounding area. Accordingly, redeveloping the site for residential use will provide a more compatible and sympathetic scheme than currently exists. Most importantly, the design of the proposed scheme has had regard to the adjoining application under consideration (*Ref 210279*) so that if the application is permitted, they do not conflict with one another. Given they will both be residential uses in line with the prevailing context, the schemes are considered to be fully compatible. The supporting text to Policy EM3 recognises the need for flexibility with existing employment land to allow an appropriate balance of uses, therefore this approach allowing the natural economic fluctuations and needs across the site to drive the most appropriate uses for this site (as opposed to seeking to develop comprehensively as you made do on much larger areas).
- 5.17 Taken in the round and considered as a whole, it is considered that the proposal satisfies these criteria and complies with Policy EM3. The existing industrial buildings are in poor condition with uses that are not compatible with the surrounding residential context, indeed resulting in complaints from local residents. The site is clearly in need of redevelopment but given the location, the viability of bringing forward compatible commercial uses is unrealistic. The site is not conducive to sustained light industrial use and in light of the Borough's housing need, a residential scheme will make a valuable contribution and be far more in keeping the character of the area. Having regard to paragraph 120 (c) of the NPPF, *substantial weight* should be given to utilising sites such as this for new homes. It is a far more efficient use of the land considering the vital need for new quality housing.
- 5.18 Overall and on balance, the development is considered acceptable in principle. The site is within a highly sustainable location and has excellent access to public transport, local shops, services and employment opportunities. Reading train station, which is in close proximity to the site, provides frequent train and bus services to London in the East and Bristol in the west. The site is also in close proximity to the cycle network via Gosbrook Road and high frequency bus services. The site is also within close proximity to a number of open spaces including the River Thames, Kings Meadow, View Island and Christchurch Meadows. It is therefore clear that the site provides an appropriate location for new high quality housing in accordance with RBLP policies H1 and EM3.

Layout, scale and design and the impact on Heritage Assets

- 5.19 RBLP Policy CC7 states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Layout, landscape, density and mix, scale and architectural details and materials will be assessed to ensure that the development proposed makes a positive contribution to character, continuity, quality of the public realm, ease of movement and permeability, legibility, adaptability and diversity. RBLP Policy H2 requires an appropriate density and mix for residential development that has regard to the character and mix of uses in local area, with consideration to nearby heritage assets.
- 5.20 RBLP Policy EN1 states that historic features including their settings will be protected and where possible enhanced. Policy EN6 states that in areas characterised by heritage assets, the historic environment will inform and shape new development.
- 5.21 S.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on the LPA to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.22 Paragraph 199 of the NPPF that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
- 5.23 Paragraph 200 of the NPPF details that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 5.24 Paragraph 202 of the NPPF requires where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 5.25 Paragraph 206 of the NPPF details LPA's should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance.
- 5.26 It is also worth noting that the NPPF defines setting as; *'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'*.
- 5.27 In this case, the proposed development has developed and evolved with very careful consideration to the character of the local area, neighbouring constraints and the historic context. This is reflected in the Council's pre-application response stating that "the proposed design has clearly taken in to consideration the listed building at Ivy Farmhouse." The accompanying Design and Access Statement ('DAS') provides a full contextual analysis for the design approach and how it has been influenced by these key aspects.

- 5.28 The site itself is unusual as it forms part of a pocket of light industrial and residential development that does not follow the prevailing local grain of Victorian two storey terraced residential forms that are mostly observed in this part of Caversham. The site and immediate surrounding form is an inconsistent piecemeal urban layout of buildings ranging from one to three stories in height.
- 5.29 A three-storey apartment block is located on the corner of Send Road and Gosbrook Road to the north-west and on Star Road to the east, with a single storey dwelling and three storey terrace in Forge Close. More traditional two-storey dwellings then line the north side of Gosbrook Road and further south along Send Road. Two storey light industrial buildings are then located immediately to the south of the site and there are single storey light industrial buildings to the west. To the north, there are further single storey light industrial buildings (subject to the planning application for six flats) and the two-storey Grade II Listed 'Ivy Farmhouse'. It is clear, other than the Listed Building and the traditional terraced housing along Gosbrook Road, the other buildings do not make a positive contribution to the character of the area or in the case of the various light industrial buildings, they make a negative contribution.
- 5.30 As such, the proposed layout and scale of the proposed buildings is considered to appropriately draw on the positive building forms in the wider area and provide a contemporary housing scheme that will significantly improve the character and appearance of the site. Moreover, the provision of a mix of two and three bedroom houses (as opposed to apartments) is considered to better reflect local vernacular. The pre-application response stated that "the mix of units is acceptable and houses instead of flats are welcomed." The proposed development is a significant improvement in all respects over the previously submitted scheme for 14 apartments on the site.
- 5.31 The proposed layout has sought opportunity to provide two frontages (onto Send Road and Forge Close), with back to back dwellings which is consistent with other residential streets in the vicinity. The layout has utilised established building lines that respond positively to each streets context. In Send Road, the dwellings are aligned closer to the street with smaller front gardens, reflecting the characteristics of the local Victorian street based housing and in Forge Close, the dwellings are set back further from frontage, with parking and larger gardens along the frontage, consistent with the character of the this street.

- 5.32 In terms of the scale, following comments from RBC Officers in the pre-application response, the overall massing and height of the proposed buildings have been reduced. This has been achieved through amendments to the roofline, along with the introduction of a more subservient traditional dormer which replaces the previously proposed larger brick framed windows. The dwellings lining Send Road now introduce a flat roof section at the ridge to keep the height down and the eaves height on the Forge Close dwellings has been lowered through the use of the more traditional dormer. This ensures that the development reads more easily as a two-storey terrace and with reduced massing, in keeping with the prevailing residential grain of the wider local area. The proposed 2.5 storey building height (2 storey with accommodation in the roof space) is considered commensurate to the mixture of buildings heights identified in the immediate area, and is lower than the existing buildings at 1-5 Forge Close.
- 5.33 Regarding the overall design of the dwellings, the contemporary brick built terrace is designed to be sympathetic to the listed building and local vernacular described, by utilising a palette of materials that corresponds with the listed building and local character. This includes slate roof tiles; grey/silver brickwork (Send Road); a red/orange brickwork of a darker tone that is in keeping with the garage of the listed building so as not to compete with the lighter red tone of Ivy Farmhouse itself (Forge Close); soldier course banding for both terraces, and concrete cills/capping detailing. In response to pre-application feedback, on edge brick detailing has been replaced with contrasting brickwork patterns around window openings to add detail and the Forge Close building includes a chimney stack at each end to add interest and reflect the character of the listed building.
- 5.34 In terms of the impact on the listed building, the layout and design of the scheme has paid special attention in ensuring any harm to the buildings historic significance by development within its setting being minimised. Importantly, RBC's Conservation and Urban Design Officer considered the impact on the listed building would be acceptable.
- 5.35 The application is supported by a Heritage Statement submitted with the pre-application which has assessed the listed buildings significance and the impact from the proposed development. It notes that the Grade II 'Ivy Farmhouse' significance lies in its historical, evidential and aesthetic values largely embodied in the building's fabric, form and its Georgian architectural stylings. The immediate setting (its domestic garden) provides a small positive contribution to the asset's significance as a small remnant of its early and much larger domestic grounds. However, it has lost most of its original/early domestic gardens (to the south, south-west and west) to the densely built up surrounding area. This small garden now derives a negligible contribution to its significance from its setting.
- 5.36 The statement notes that the greater legibility of the asset's significance is made available from Gosbrook Road, where its main façade and aspect is apparent. Its rear and gable elevations are largely obscured from view by later developments and extensions, and the relative domesticated enclosure.

- 5.37 It terms of the current proposal site, the statement identifies that the unsympathetic and unattractive light industrial mid and later twentieth-century piecemeal development does not accord with the most positive residential built form that has been introduced into the asset's setting from the nineteenth century (the two storey dwellings along Gosbrook Road). The Site forms a small portion of the asset's setting and currently makes a largely negative contribution to the asset's significance and that significance's legibility.
- 5.38 The proposed scheme, whilst introducing more built form to the site than at present, has been careful to respect the setting of the listed building. Principally, the impact is mitigated by the terraces fronting the roads to the east and west and, therefore, leaving a newly undeveloped strip of open land or 'green corridor' extending on an axis south of the heritage asset's rear wing. The Forge Close terrace, being the closest building to the asset, does not include accommodation in the roof space, allowing the northern roof slope to be hipped towards the asset. This helps ensure that the listed building maintains its prominent position in the street scene.
- 5.39 Taken in the round, the statement identifies that the demolition of the sites negative structures is beneficial but does recognise that by virtue of building the proposed two-storey buildings within its setting there will be a level of harm to the legibility of the assets significance— albeit the harm is considered to be a negligible/minor level of harm. With this in mind, whilst mitigated through the high quality design as described, the tests set out in the NPPF are engaged, given some harm is identified.
- 5.40 This harm identified is clearly 'less than substantial' and at the lowest point of any sliding scale of harm. Notwithstanding, as per paragraph 202 of the NPPF this harm must be weighed against the public benefits of the development. This exercise is undertaken in the 'planning balance' in Section 6 of this report and details how the public benefits outweigh this negligible/minor harm to the listed building.
- 5.41 Therefore, having regard to the development as whole, it is considered the layout, scale and design of the development accords with RBLP policies CC7, H2, EN1 and EN6. The development also accords with the NPPF and statutory duties in the Planning (Listed Building and Conservations Areas) Act 1990.

The Highway, Access, Transport and Parking

- 5.42 RBLP policy TR1 details that all development proposals should make appropriate provision to ensure an adequate level of accessibility and safety by all modes of transport, particularly sustainable modes, in accordance with any agreed transport assessment submitted as part of the application. RBLP policy TR3 then seeks to ensure that all new accesses to the highway are safe and do not have an adverse impact on the highway network or its users. Policy TR5 notes that development should provide car and cycle parking that is appropriate to the accessibility of sustainable transport facilities, particularly public transport. It also requires that all new houses of this scale should provide electric vehicle charging points.

- 5.43 The above policies are then supported by the adopted Revised Parking Standards SPD (2011) which notes that the site is located within Zone 2, a Primary Core Area. This means the site is generally considered to be well served by public transport, within reasonable walking distances of transport nodes and close to local centres. It notes that in this area, 2 bedroom dwellings should provide one car parking space and 3 bedroom dwellings, two spaces. The SPD does provide some flexibility whereby if fewer parking spaces are required than the standard, it can be acceptable if demonstrated to the Highway's Authority that there will not be any highway safety issues.
- 5.44 In this context, it is material to note that Paragraph 111 of the NPPF states that, *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*.
- 5.45 Another material consideration is the emerging Reading Transport Strategy 2036 ('RTS'). This was issued in 2020 with a statutory consultation closing in August 2020. This document provides an important insight into the future of the transport strategy for the Borough, a key thrust being to remove dependency on the private car and simultaneously improve sustainable forms of transport.
- 5.46 Having regard to this policy context, the application is supported by a Transport Statement ('TS') and a report 'Sustainable Journeys', the latter appraising the development against the principles and objectives outlined in the RTS.
- 5.47 Firstly, the TS details that the site is within a highly sustainable and accessible location and this was acknowledged in RBC's pre-application response. The site is within 200m of two bus stop locations, with high frequency services to a variety of destinations, including Reading Town Centre, Oxford, Marlow and High Wycombe. Pedestrian links are excellent, with a wide range of local services and facilities within 10 minutes' walk of the site, which is also close to the Reading Cycle Network for easy cycle access to the Town Centre and recreational routes. Reading Station is also only approximately 1.5km from the site, still within a reasonable walking or cycling distance, or a short bus journey to the locality. Clearly, the site's location lends itself to maximising sustainable transport modes. It is likely that the future residents will not be reliant on the car to make the majority of their local and longer distance journeys.

- 5.48 In terms of vehicular access to the highway, both Send Road and Forge Close are adopted highways. Traffic data indicates a relatively low level of traffic movements past the site (averaging one every 1 minute and 45 seconds) and vehicle speeds are recorded to be low at 21.8 mph (two-way 85th Percentile). Analysis of the existing uses on the site and the proposed development using the TRICs database show that the proposed scheme is likely to generate only a low level of vehicle movements (40 daily). As such, when considering the existing use of the industrial unit, partly as a tyre/vehicle repair centre, any overall net traffic effect on the highway network is expected to be negligible. Appropriate visibility splays have been demonstrated, along with vehicle tracking access and egressing to the site, which demonstrates that there is enough stopping distance and vision having regard to average vehicle speeds. There have been no personal injury collisions recorded at this location in the last 20 years.
- 5.49 In terms of vehicle parking, the proposed dwellings on Send Road have integral garages, whilst the dwellings on Forge Close will have off-street driveway car parking. One unit on Forge Close (no.9) will have no on plot car parking, albeit there is a parking space for a motorbike or electric motorcycle (along with accompanying security ground anchor).
- 5.50 Regarding the parking provision, it is acknowledged that the development falls short of the guidance in the Revised Parking Standards SPD; however, there are compelling reasons to demonstrate that the provision is more than sufficient, having regard the relevant policies and particularly, RBC's emerging RTS. It needs to be acknowledged that the SPD is just guidance which provides flexibility based on site specific circumstances and is also some 10 years old, thus does not necessarily fully align with the ambitions set out in the emerging RTS or the changing reality of car ownership and sustainable transport today.
- 5.51 The scheme has ultimately been designed with sustainable transport at its heart, which will help to steer future residents to make sustainable choices and lessen dependency on private cars.
- 5.52 In this context, analysis of local Census data shows that amongst similar size houses to the proposed development in Caversham, 25% have no car, 52% have one car, 19% have two cars, and 3% have three or more cars. This equates to a local average car-ownership of one car per unit, and the proposed development is likely to have a similar demand for parking. The proposed two-bedroom house in Forge Close with no on-site parking will be marketed as such, and will be self-enforcing in terms of parking demand — car-owners are unlikely to buy or rent a house with no parking. This house will be specified as having motorbike or electric motorcycle parking, with an appropriate electric charging facility and secure locking base plate or anchor. The 25% of local households with no car demonstrates that there is already a precedent and demand for car-free dwellings in the area. This scheme provides that choice.

- 5.53 In addition, a parking survey has been completed to record the local capacity of on street parking. Whilst Send Road falls within a controlled parking zone, Forge Close remains unrestricted, as do many other roads in close proximity. This survey was carried out on the nights of Wednesday 14th July 2021 and Thursday 15th July 2021, and recorded parking availability and occupancy on all roads within a 200m walking distance of the site, as well as a number of local roads beyond 200m but still within a realistic and reasonable walking distance.
- 5.54 The parking survey has shown that within 200m of the site there were nine available unrestricted parking spaces on the Wednesday night, and six available unrestricted spaces on the Thursday night, including four and three spaces respectively within Forge Close. On the surveyed roads beyond 200m of the site but still within a realistic and reasonable walking distance, there were 63 spaces and 59 available spaces with no restrictions overnight between 17:30 and 09:00. Therefore, it is clear that there is capacity in the local vicinity for further on-street parking if the proposed development demands (such as visitors).
- 5.55 The integral garages themselves, whilst being slightly short of the Council's guidance internal standards, address the intent of those standards in facilitating access and egress for bicycles. The garages will house internal bicycle storage which is located to the side, as opposed to the end, negating the need for a garage of 7m to provide storage. The RBC parking SPD states that driveways should be a minimum of 6m in length so as to avoid obstruction to the highway while accessing a garage. It also states that driveways shorter than 6m in length may be acceptable in 'very quiet residential streets'. The proposed garages will be fitted with high quality electric doors which can be fully opened from 20m away in seven seconds, therefore ensuring no waiting on the highway when manoeuvring. Considering the slow vehicle speeds, this is demonstrated to be safe. Therefore, the access and size of the garages meet the required standards and are acceptable. The garage doors will also include a wicket door to further facilitate bicycle access.
- 5.56 Each plot also provides an electric vehicle charging point and provision of secure bicycle storage/other sustainable mobility storage (such as electric scooters). Bicycle and mobility stores will also feature electric charging catering to the full array of modern personal transportation devices.

- 5.57 Overall, having regard to the highly sustainable context of the site, the relevant development plan policies, parking SPD and emerging RTS, the development will not have an adverse impact on the highway network or highway safety. The development strikes an appropriate balance of providing adequate private car parking in response to the site context, whilst also meaningfully promoting future occupiers to incorporate sustainable transport modes into their lifestyle. Based on local evidence, the reality is that it is highly likely occupiers will only require a single vehicle space, if any at all. Occupiers choosing to live in dense, sustainable urban areas such as this will occupy the properties in the knowledge that significant private car use will not be required. Should further parking be required, for example, for visitors, the parking survey has shown that there is lawful capacity in surrounding streets, therefore the development will not result in any indiscriminate or obstructive parking. The proposed development use results in a betterment in this context, where enforcement action has been taken against the existing repair shop for parking unlawfully and causing obstructions.
- 5.58 This balance is clearly in line with RBC's emerging RTS as the development promotes a stepped change to move occupiers away from private cars in highly sustainable urban areas. As such, the development accords with RBLP policies TR1, TR3 and TR5, the Revised Parking Standards SPD and policy guidance in the NPPF.

Flood Risk and Drainage

- 5.59 RBLP policy EN18 details that development will be directed in areas of low flood risk and follow the Sequential and Exceptions Test (as set out in the NPPF), taking into account the effects of climate change. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. This policy broadly encompasses the most up-to-date policy guidance as outlined in the NPPF and PPG.
- 5.60 In this case, the site is located in Flood Zone 3 due to its proximity to the River Thames. Part of the site is already in residential use and the other part is in a commercial use. Notwithstanding, it is recognised that the development involves introducing further 'More Vulnerable' uses (Residential Use) within Flood Zone 3. Accordingly, the application is supported by a Site Specific Flood Risk Assessment (SFRA) and supporting details of the relevant sequential and exception tests undertaken by a specialist flood risk consultant.

The Sequential Test

- 5.61 In accordance with the NPPF, the first point to consider when bringing forward residential development in Flood Zone 3 is the sequential test.
- 5.62 Paragraph 163 of the NPPF notes, *'The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding'*

- 5.63 The supporting Sequential Test document has considered this in detail. This has investigated the RBLP's flood risk evidence base. The RBLP's supporting Sequential and Exception Test 2018, clearly identifies that given the urban constraints of Reading and its housing requirements, there is not enough land in Flood Zones 1 to accommodate the required levels of housing, therefore sites in areas of higher areas of risk will need to be considered. Indeed this document also assessed the potential for development of 4-6 Send Road and found that that it passed the sequential test on this basis.
- 5.64 Notwithstanding, this application's supporting Sequential Test has assessed the potential of alternative sites contained in RBC's 2017 Housing and Economic Land Availability Assessment (HELAA) (both allocated and non-allocated sites) in lower risk flood areas and against commensurate reasonable criteria. It has found there are no other reasonable alternative sites where this development can be accommodated, therefore passing the sequential test.

SSFRA and the Exception Test

- 5.65 As set out in in the SSFRA, the development has been specifically designed to meet the flood risk and climate change future-proofing requirements given the site is within Flood Zone 3. The flood risk and drainage consultants have worked closely with the Environment Agency (EA), the architects and landscape designers to optimise the scheme.
- 5.66 The flood design parameters have been previously fully agreed and approved by the EA through their own pre-application services. The EA's exact requirements have been incorporated into the scheme and it is appropriately designed to be exactly the same as the development adjacent to the north (Ref: 210279 - 389 Gosbrook Road), which the EA are also content with.
- 5.67 The design features ensure that there is no non-floodable footprint or raising of land levels in the functional flood plain and that ground floor and slab levels in the new buildings are above the 1in100year+35%cc flood levels. Voids are proposed beneath the buildings to ensure any possible flood water is unobstructed and storage capacity is increased. All these features provide a significant betterment over and above the existing dwelling and commercial building on the site, ensuring they are flood resilient taking into account climate change and safe for their lifetime. Flood storage will also be increased on site, reducing flood risk to surrounding properties.
- 5.68 In ensuring there is safe access and escape routes where appropriate, the SSFRA notes that there is safe and dry access during the peak of the 1in20year flood based on the EA data. The site would retain dry access for all scenarios except the extreme future catastrophic flood event, and even then, only after 5+days after the onset of the flood event.

- 5.69 Due to the distance from the source and Time To Inundation (TTI) (5+ days) and the nature of this built up area, the water velocities would be 'low' or 'very low', in which case the pedestrian routes would still be considered a 'Very Low Hazard' for depths up to 250mm. Flood waters would be zero depth for the site access / egress for over 5 days at the site from the onset of the flood event. Therefore it is considered with a Flood Response and Management Plan (which could be secured by condition) the development is safe and appropriate in this location.
- 5.70 Overall, having regard to the development's design which manages flood risk as set out in the SSFRA, it is considered the development passes the exception test in technical flood risk terms and provides wider sustainability benefits to the community, which are considered in the conclusion of this statement.

Drainage

- 5.71 In order to meet the NPPF and LLFA requirements for further flood risk reduction, the scheme incorporates the highest form of SUDS (Sustainable Drainage Systems) including specifically:
- Maximised porous and permeable areas;
 - Integrated surface storage planters; and
 - Granular angular subbase minimal maintenance storage.
- 5.72 The EA confirmed that infiltration techniques are not allowed at this site due to the protection required for the groundwater. The strategy has therefore been optimised to store on site and discharge at the required restricted discharge rate using the existing connections as feasible. Full details are provided in the Flood Risk Assessment and SUDS Strategy (Ark Environmental, 2021) which concludes the scheme: *"can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere, in fact reducing flood risk overall; it is therefore considered appropriate development in accordance with the NPPF/PPG"*.

Living Conditions (Neighbouring and Future Occupants)

- 5.73 The impact on the amenity and living conditions of both neighbouring and future occupants have been carefully considered in the design of the scheme.
- 5.74 RBLP policy CC8 requires that development will not cause a detrimental impact on the residential amenity of existing properties or impose worse living conditions for new residential properties. This includes considering matters of privacy, overlooking, noise and sunlight, as well as other related matters. It also requires a back-to-back distance of 20m, although the circumstances of individual sites may enable closer proximities without and impacting privacy.
- 5.75 Policy H5 then requires the dwellings to comply with the Nationally-described space standards (NDSS) and be accessible and adaptable in line with M4(2) of the Building Regulations. Policy H10 notes that dwellings will be provided with functional private spaces that respect the size and character of similar spaces in the vicinity.

Neighbouring Occupants

- 5.76 The proposed development has been carefully designed to ensure that there is no significant adverse impact on the amenity of the neighbouring occupants. To the north and south, the existing neighbouring occupants are unlikely to be significantly impacted as the proposed scheme does not include any side elevation windows that may impact on their privacy. In particular, this will mean there is no overlooking into the private spaces of Ivy Farmhouse's rear garden. In addition, rear windows on the Send Road terrace have been designed to either be obscured or at a high level, so views towards Ivy Farmhouse from this elevation are not accessible, notwithstanding this is a rather oblique angle. In the event the proposed re-development at 389 Gosbrook Road is permitted and implemented, the proposed scheme would not conflict with this scheme, again owed to the blank flank elevations and a reasonable degree of separation across a proposed car park.
- 5.77 In context of neighbouring properties in Forge Close, the building line of the proposed terrace being set back from the frontage ensures a reasonable degree of separation from 399 Gosbrook Road (of approximately 18.5m) and does not extend beyond the building of the three storey Forge Close terrace. The proposed property facing 399 Gosbrook Road is 2-storey, without roof space accommodation and only 'overlaps' this property by approximately 3.5m's. Given that this degree of separation exceeds that of the relationship of the 3-storey apartments in Star Road and 399 Gosbrook Road (approximately 13.4) and this is a front to side relationship with an intervening highway (the majority of 399 Gosbrook Road's private amenity space is located north of the building), there will not be a significant impact on these occupiers privacy.
- 5.78 A daylight and sunlight assessment was carried out for the pre-application and is submitted to support the application. This has shown that in context of the neighbouring properties that may be sensitive to overshadowing (Ivy Farmhouse), the scheme performs well ensuring 89% of their amenity space receives more than two hours of sunlight on 21 March under proposed conditions, which notably exceeds the BRE recommendation of 50%. In terms of impact on daylight and sunlight into neighbouring residential properties internally, utilising the BRE 25-degree test and checking Vertical Sky Components ('VSC'), the assessment did not identify any significant adverse impacts. All neighbouring windows assessed passed either of the 25 degree standard or on a small number openings, the VSC. In particular the proposed Forge Close terrace does not contravene the 25-degree plain from any of 399 Gosbrook Road's windows, or the VSC.
- 5.79 Overall, the impact on the neighbouring buildings and occupants will be limited, according with RBLP policy CC8. The pre-application response stated: "Due to the orientation of the proposal there is not considered to be any harm in terms of loss of sunlight and daylight to neighbouring properties as concluded in the daylight and sunlight assessment. Although the proposed houses would be clearly visible it is not considered that they would be harmful to the outlook for the residents of neighbouring properties." There will likely be some betterment in removing the current industrial uses, which are not compatible in a predominantly residential area.

Future Occupants

- 5.80 In terms of future occupants, this has also been fully considered in the design of the development. The 3-bedroom properties have been designed to accommodate four people and the 2-bedrooms, three people. The 3-bedroom Send Road properties each have a Gross Internal Area ('GIA') of 96m², the 3-bedroom Forge Close properties a GIA of 90m² and the 2-bedroom properties, a GIA 70m². These exceed and meet the minimum Nationally Described Spaced Standards of 84m² and 70m² for 3b4p and 2b3p respectively, complying with RBLP policy H5. The proposal has also been designed to ensure all of the internal circulation spaces and room sizes are as per Approved Document M, Part M4(2).
- 5.81 Regarding the 'back to back' layout, first floor windows are approximately 16m apart. Whilst this is less than the required 20m between habitable rooms required by RBLP policy CC8, as already identified, rear elevation windows do not serve habitable rooms and openings are either obscured or set at a high level to maintain privacy. The supporting daylight and sunlight assessment has also considered this back to back relationship and has not identified any significant issues. Applying the relevant methodology, the development achieves Average Daylight Factor (ADF) for internal daylight and exceeds sunlight/overshadowing minimums during the day. The pre-application response stated: "Through design the proposal has demonstrated that there would not be a detrimental impact on privacy for future residents of the houses at Send Road or Forge Close. In terms of daylight and sunlight an assessment has been submitted which concludes that the proposal performs well in relation to daylight and sunlight access for windows and amenity spaces in general and there are no significant impacts to daylight and sunlight on surrounding properties and amenity spaces. As such, this is considered acceptable." As such, this relationship is considered to be acceptable and recognised to be acceptable to Officers in the pre-application enquiry. Future occupiers will be afforded appropriate privacy, daylight and sunlight.
- 5.82 In terms of private amenity space, each dwelling will be afforded a rear private garden between 35m² and 40m². The Send Road houses also include a private balcony. RBLP H10 policy requires functional spaces that have regard to the character of similar spaces in the vicinity. It does not set a specific standard, albeit the subtext refers to taking into account the site context and locality for public open spaces, with reference to historic standards as useful guide. In this case, typical Victorian terraced houses in the vicinity have small rear gardens (such as those in Queens and Kings Road). This is the nature and character of this housing type, which the proposed development has taken reference from. It would be unrealistic in this area for a 'back to back' terrace to have gardens that are greater than the GIA of the property they served. The site is also within close proximity to a variety of public large open spaces (Kings Meadow, Hills Meadow and Christchurch Meadow) as well as other outdoor recreational facilities (Caversham Lakes). Therefore, it is considered the garden space is appropriate to the context and commensurate to the prevailing local character, and house type. The provided amenity space is much more favourable than flatted schemes in Reading, which normally typify development of sites like this. Flatted schemes typically provide as little as 10m² of private amenity space at best, and in many instances provide none at all.

- 5.83 Overall, the proposed development ensures future occupants will have quality standard of living with an appropriate level of private outdoor space commensurate to the character of the site and area, as well as an appropriate level of indoor space for modern urban living. Privacy between dwellings is maintained through the design and layout of the scheme. Therefore, the proposal accords with RBLP policies CC8 and H10.

Arboriculture

- 5.84 RBLP policy EN14 seeks for important trees to be protected from removal or damage. It requires that new development makes provision for tree retention and planting within the application site as well as maintaining and enhancing the character and appearance of the local area.
- 5.85 In this case, there are no trees in or around the site that are protected by any designations (Tree Preservation Order or Conservation Area). The application is supported by a Tree Survey (TS) which has assessed trees in and immediately adjacent to the site. A small number of trees will need to be removed to allow the development to be undertaken, however, these trees are categorised 'U' and 'C', therefore are of a low quality and offer a limited landscape value. They include three small Category 'C' ornamental trees within the boundaries of 2 Send Road and a category 'U' Sycamore group along the southern boundary of 4 Send Road. Given their quality, low landscape contribution and short lifespan, their removal to facilitate the development is not considered to be unacceptable.
- 5.86 Furthermore, as part of the development proposals additional tree planting and landscaping is incorporated as part of a comprehensive landscaping and tree planting scheme. This ensures that there is a net gain of tree planting, of diverse species and broader canopies, across the site. The extensive landscaping planned at the rear of the property will also create a tree lined vista from the listed building, connecting the network of existing trees
- 5.87 In terms of trees outside of the site, it is noted that to the north of 2 Send Road, there are two trees within the boundary of the neighbouring property. The TS demonstrates that the root protection areas of these trees are outside of the area of development, and that the canopies of the trees are far enough away so as to not result in any pressure on new buildings. In any event, these trees are likely to have constrained root zones owing to the substantial and long standing brick wall on the boundary, and a series of sheds and impermeable hardstanding on the boundary of 2 Send Road. These trees have been identified as an Ash (with evidence of ash die back disease) and a Bay tree, which are classified as Category U and Category C respectively. Because the RPAs of these trees are not adversely impacted by the development, they can be retained, albeit that they make only limited contribution to the character of the area. Having regard to these matters it is considered the development will not have an adverse impact on trees outside the site and an Arboricultural Method Statement is not required.

- 5.88 Overall, it is considered that trees to be removed are of a low quality and additional planting and landscaping of a high quality will mitigate the impacts and provide significant enhancements, and trees outside the site will not be affected by the development. Therefore, the development accords with RBLP policy EN14.

Ecology, Biodiversity and Landscaping

- 5.89 RBLP policy EN12 seeks to principally ensure that there is no net loss in biodiversity and seeks a net gain where possible. Development should protect and enhance features of biodiversity interest, as well as providing ecological enhancements (bird and bat boxes) wherever practicable.

Ecology

- 5.90 The application is supported by a Preliminary Ecological Appraisal and Bat Scoping report. A survey of the site was completed and established that the bat roost potential of the buildings on both 2 and 4 Send Road are 'negligible' (a structure that does not support any features that could be used by roosting bats), considering their construction types, condition and context within low value foraging habitat for bats.
- 5.91 This was other than a small area of six lifted tiles on the south-eastern corner of 2 Send Road's roof. Whilst based on the condition of the buildings, no further emergence surveys are required, it is recommended, as a precautionary measure, that a licensed bat ecologist is to be present to inspect and oversee the soft stripping of the small section of lifted tiles on the south-eastern corner of the bungalow prior to demolition. This is so that, in the unlikely event a bat or evidence of a bat roost is present, the risk of injury/killing or destruction of a roost is avoided. This can be secured by condition.
- 5.92 In terms of the trees contained within the boundary of 2 Send Road, they were found to have a 'negligible' potential to support roosting bats, therefore tree roosting bats would not be a constraint to development on this part of the site. Access to survey the trees in 4 Send Road was not granted at the time of the survey; however, this was not a considered a limitation, given the ecologists overall assessment of the site being of negligible value to protected and notable species.
- 5.93 To mitigate any impacts and make ecological enhancements on the site, the development is proposed to integrate bird and bat boxes into new buildings and as explained below, significant enhancements in biodiversity through landscaping is proposed. Therefore, given this assessment, the development accords with RBLP EN12.

Biodiversity and Landscaping

- 5.94 As touched on, the proposed development includes a 'green corridor' between the terraces, which not only assists in limiting the impacts on the setting of the listed building but also provides significant net gain in biodiversity and green infrastructure, as well as an opportunity for enhanced sustainable drainage solutions across the entire site.

- 5.95 A comprehensive landscaping masterplan and planting strategy are submitted to accompany the application and all species have been carefully considered to optimise the available space. Hedgerows, trees and specimen shrubs have been proposed which will create a longer term green structure as well as contributing to capturing carbon emissions and particulate matter from vehicles year round.
- 5.96 A range of planting types are proposed which include three medium sized tree species selected to provide structure, canopy cover and diversity. These are assisted by smaller growing specimen shrubs again selected to provide further species variety as well as character and variation in form, colour and seasonal interest.
- 5.97 At the lower level a mix of evergreen and perennial plants have been selected that will encourage increased wildlife. Climbing plants have been specified to grow along each of the fences with species again being selected for both their visual and wildlife enhancing qualities. This will promote insects and pollinators, and the grassed areas within each of the gardens will include flowering species.
- 5.98 Planters have also been integrated into the window reveals which will be planted with a range of flowering and trailing plants. In addition, as already mentioned, biodiverse green roofs have been incorporated into the single storey flat roof sections of the proposed Send Road houses and also on bin, bicycle and mobility stores across the whole site. These will not only contribute to the high quality and green landscaping of the site, but will intercept rainfall and in the case of several of the planters they will be irrigated directly from rainwater goods.
- 5.99 This planting strategy and use of planters (some of which will receive rainwater directly from the rainwater goods of the houses) will greatly enhance the sustainable drainage performance of the site, capturing rainfall and holding it back from release, while simultaneously increasing the green cover of the site, providing air quality gains and biodiversity enhancements.
- 5.100 Overall the proposed landscaping and planting scheme is of a very high quality and will significantly enhance biodiversity across the site, in accordance with policies RBLP policies CC7, EN12, and EN14

Environmental Health Matters (Land contamination, Air Quality, Noise and Waste Management and Construction Management)

Land Contamination

- 5.101 RBLP policy EN16 details that development will only be permitted on land affected by contamination where it is demonstrated that it can managed or remediated so that it is suitable for the proposed use. Residential uses tend to be considered as sensitive contamination receptors, therefore any ground pollutants and potential impact on human health need to be considered.

5.102 In this case, given the existing light industrial uses on part of the site, a preliminary Phase 1 Desktop Risk Assessment has been undertaken by Syntegra Consulting and submitted in support of the application. This has examined the sites history of uses on the site and other off-site sources in the vicinity that may contribute to potential sources of contamination for a variety of receptors. Through a walkover and desk-top investigation of the site potential on-site sources include the existing tyre fitting and other light industrial operations. Off-site uses include the British Cooling yard adjacent to the south; Electrical equipment repair/servicing 18m to the South; Coachworks/garage 20m to the West; a Garage 70m to the West; and a Scrap metal yard 124m to the east.

5.103 The report has assessed the risks of contamination from these sources and concluded that there is a low to moderate risk. There is a low risk of soil gases from potential sources, therefore ground gas monitoring is not required, unless any ground gases are reported during further investigation. There is a moderate risk of soil contamination from previous sources and the assessment recommends further intrusive investigation to undertake an initial soil and water chemical testing suite would be required to consider a range of potential contaminants. This further Phase 2 investigation can be secured via condition as it seems likely they cannot be completed until buildings on the site have been demolished.

5.104 Given the relatively low risk indicated, it is likely that if any soil contamination is discovered through further investigation, it will be able to remediated or mitigated through the development. Part of the site is also already in residential use being served by the local water network, therefore it is feasible that the site will be suitable for extending this use in this context. Therefore, it is considered that the development accords with policy EN16 and the development can be accommodated without any adverse impact on human health.

Air Quality

5.105 Policy EN15 in the RBLP seeks to ensure new development has regard to the need to improve air quality and reduce the effects of poor quality. It notes that development should not be permitted that detrimentally affects air quality unless the impact is mitigated.

5.106 The site is located within an Air Quality Management Area ('AQMA') and the application is supported by an Air Quality Assessment ('AQA'). This assessment has been undertaken to assess the developments potential to cause air quality impacts at sensitive locations during the construction and operational phases, as well as expose future occupants to elevated pollution levels.

5.107 The assessment established baseline conditions for assessment and compared the proposal against the mentioned potential impacts. In all cases, the impact is not expected to be significant. This is largely based on the small scale nature of scheme, limited traffic movements and location of the site not being with 200m of any major roads. The impact during construction and operational phases on air quality and human health will be limited and considered to be a constraint. As already identified, the scheme is seeking to promote less private vehicle use and steer users to more sustainable modes of transport, including electric vehicles. Therefore, the development accords with RBLP policy EN15.

Noise

- 5.108 RBLP Policy EN16 requires that proposals for development that may be sensitive to the effects of noise (such as residential uses), will only be permitted where they are not subject to high levels of pollution.
- 5.109 The application is supported by a Noise Assessment, which included monitoring of noise levels over a 4 day period. The assessment established that the soundscape of the site comprised traffic noise from the B3345 Gosbrook Road and local vehicle movements, and some nature noise from wildlife and vegetation. Any activities at the commercial unit across Send Road were not audible whilst the assessment was made and the measured noise levels did not indicate significant commercial activities being present.
- 5.110 The noise assessment indicated that typical ambient noise levels in the day are 50db and 43db. With attenuation from openable windows for ventilation (15db), the ambient noise level in habitable spaces are 35db and 28db respectively, below recommended levels, providing a good acoustic environment. Maximum night time noise occurrences were recorded at 66db, resulting in an internal noise level of 51 (with the above attenuation), which is 6db over the recommend maximum individual occurrences.
- 5.111 However, simple measures are proposed to ensure that there is no harmful impact and to reduce the noise levels. This includes double glazing and trickle vents to provide choice in ventilation, as part of the strategy. This ensures that an appropriate acoustic environment can be achieved, along with appropriate ventilation.
- 5.112 Overall, the initial risk assessment identified the site as a low risk in terms of noise. Appropriate noise levels can be achieved with a standard brick/block construction, double glazing and trickle vents along sensitive facades (principal elevations), to provide an appropriate ventilation strategy that provides choice for occupants. Given the site is located in a residential area, this approach is acceptable and therefore accords with RBLP policy EN16.

Waste management

- 5.113 RBLP policy CC5 seeks for development to include sustainable waste management and well-designed spaces which factor waste storage. In this context, each dwelling is provided with a secure bin store, which is large enough to accommodate the Council's refuse bins. They will be made from timber/brick to match the main house elevations, with biodiverse green roofs. Mindful of the RBC's issues with rat infestations, the applicant has also engaged a pest control contractor to utilise control methods should there be a period of time between demolition of the site and the implementation of the scheme (as outlined in the accompanying indicative Construction Management Statement ('CMS')) The secure nature of the bin stores will also assist in mitigating wildlife from foraging on waste. The development therefore accords with RBLP policy CC5.

Construction management

- 5.114 The application is supported by an indicative CMS. This sets out how the development will be managed during the demolition and construction phase to ensure that there is as little disruption on the highway network, to neighbouring residents and the environment as possible.
- 5.115 The site will be registered with the 'Considerate Construction Scheme' and in response to the Environmental Health Officer's pre-application comments, provisions will be put in place to control noise and dust emanating from the site during the demolition and construction. As above, in response to pre-application comments regarding problems with rats in Reading, a pest control specification has also been obtained and is included in the CMS. All the measures proposed in the CMS ensures that the scheme is developed in a considerate manner in accordance with BLP policies EN16, EN15 and CC5.

Sustainability

- 5.116 RBLP Policy H5 requires that all new build housing should be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations. It also requires a minimum of a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.
- 5.117 Policy CC2 notes that development should consider the use of natural resources appropriately and efficiently in relation to building design. Residential development should include recycling greywater and rainwater harvesting where it is possible to ensure energy and cost efficiency.
- 5.118 These policies are supported by the Sustainable Design and Construction SPD (2019), which amplifies these standards and requirements in the context of minor-residential developments (less than 10 dwellings).
- 5.119 In this case the application is supported by a sustainability statement, which analyses the fabric first approach which has been utilised in the design of the scheme, creating a sustainable and energy efficient development.
- 5.120 Of key note, with the use of photovoltaic roof panels as a source of energy, good levels of glazing to maximise solar gain without overheating and use of energy efficient white goods and lighting systems, the development achieves a 21.25% uplift over the minimum Part L1A Building Regulations minimum. This exceeds RBC's targeted 19%, therefore will be energy efficient and contribute towards reducing the Borough's CO2 outputs. The scheme will incorporate methods to reduce water consumption, through rainwater harvesting butts and installed water meters, so that future occupants can monitor and mindfully reduce consumption.

- 5.121 Coupled with the suite of other sustainability measures which have been incorporated into the scheme and are touched upon in the relevant sections (promoting sustainable transport, significantly increased biodiversity and reducing flood risk), the development is highly sustainable and accords with RBLP policies H5 and CC2

Planning obligations (Affordable Housing and CIL)

- 5.122 Relevant planning obligations relevant to this site are considered to be affordable housing contributions (which would be a financial contribution secured via a s106 legal agreement) and the Community Infrastructure Levy ('CIL') which secures contributions based on new residential floor space to go towards general local infrastructure.

Affordable Housing

- 5.123 Whilst affordable housing contributions are not ordinarily required on small-scale minor housing developments, RBLP policy H3 requires that on sites of 5-9 dwellings, affordable housing contributions are required. This is on the grounds that Reading has a significant identified need for more affordable provision. The policy notes that for schemes of this scale, this will be in the form of financial contributions to enable the equivalent of 20% of the housing to be provided elsewhere in the Borough.
- 5.124 This approach is supported by the Affordable Housing SPD, which requires the contribution to equate to 10% of the Gross Development Value ('GDV') of the development. It notes in some cases, it may not be viable to provide this level of contribution. In such cases, a viability assessment should support an application. It is noted that the Council takes an open book approach to this and will publish supporting assessments, unless there is a compelling reason not to.
- 5.125 In this case the applicant has commissioned a Viability Assessment to review the viability of providing an affordable housing contribution as required by the policy (10% of the GDV). The assessment shows the proposed development will have a GDV of £3,941,071 and therefore a policy compliant contribution of £394,107 would be required. However, having regard to all reasonable and standard cost assumptions to develop this brownfield site, plus several site specific costs (the high quality build, external works, landscaping, sustainability measures and raising above flood levels), it will not be viable for the development to make any affordable housing contributions. The development would result in a deficit of -£13,414, therefore, there is no surplus generated to support a contribution or any other s106 costs.
- 5.126 Therefore, whilst contributions cannot be made in this instance, the policy provides flexibility where justified. The appropriate evidence and justification is provided in the viability statement, therefore the development accords with RBLP policy H3.

Community Infrastructure Levy (CIL)

5.127 It is noted that CIL charging schedule was adopted in 2015, to be applied to all new residential floor space. The adopted charging rate is £120 per sqm, indexed to £156.71 per sqm up until 31 March 2021. CIL form 1 accompanies this application and notes a GIA of proposed residential floor space to be 874 sqm. Less the existing 241 sqm of existing site floor space, the CIL chargeable GIA equates to 633m².

6. OVERALL CONCLUSIONS AND THE PLANNING BALANCE

- 6.1 As detailed, planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The assessment in the preceding sections has assessed the proposed development against the Development Plan and the relevant policies.
- 6.2 As noted, the application seeks planning permission to demolish an existing dwelling and a commercial building on the site and replace them with nine high quality houses.
- 6.3 It is evident that Reading requires additional housing and given the tightly formed urban nature of the Borough, it has been identified that housing needs to be brought forward on previously developed land and on land at greater risk of flooding outside of Flood Zone 1. The proposed development will make an efficient use of the land in this case, in a highly sustainable location with easy access to public transport nodes and the centre of Reading. Part of the site is already in residential use and substantial weight should be attached to redeveloping this site for housing.
- 6.4 Whilst there will be a loss of an existing commercial use on the site, these buildings are of a low quality and the commercial use in particular, conflicts with the residential uses that dominate the surrounding wider area. During the pre-application process, RBC Officers considered that the development was acceptable in principle and it is considered that the benefits of reusing the entire site to provide additional housing outweighs the loss of light industrial space in this case.
- 6.5 As detailed in the accompanying DAS, the scheme has been designed to reflect the surrounding vernacular, taking the form of a back to back terraced scheme fronting Send Road and Forge Close. The height and massing of these 2.5 storey homes are commensurate to the mix of building heights around the site which will create a high quality street scene. Taking into the account the sites urban location, each house also provides an appropriate private rear garden space and each buildings openings have been carefully designed so that future and neighbouring occupants privacy is not materially impacted
- 6.6 An extensive landscaping scheme is also proposed, which will significantly enhance the quality of the environment around the site and substantially increase the levels of biodiversity. It will create linkage between and enhance the limited existing green infrastructure, contributing to capturing carbon emissions from vehicles in the vicinity.

- 6.7 A range of other technical surveys and reports accompany the application. These confirm that there are no harmful constraints of significance or environmental impacts in the context of the existing trees, noise, air quality or contamination. There will also be a betterment in flooding terms, given water storage capacity will be increased by raising the proposed buildings floor levels and constructing voids beneath to allow water flow during worst case extreme flood events. This helps reduce flood risk to surrounding properties and ensures much safer and resilient buildings. The existing neighbouring buildings do not benefit from these features.
- 6.8 There will also be no severe impact on highway safety or the highway network, and the scheme meaningfully seeks to promote sustainable modes of transport from this urban location, in line with the RTS.
- 6.9 Whilst it has been identified that by erecting a 2.5 storey building within the setting of the Grade II listed Ivy Farmhouse will cause a level of 'less than substantial' harm, this level is considered to be negligible/minor, given the development will, to a larger extent improve the setting by removing the poor quality buildings and create a green corridor that extends on an axis south of the heritage asset's rear wing. The Forge Close terrace, being the closest building to the asset, does not include accommodation in the roof space, allowing the northern roof slope to be hipped towards the asset. This helps ensure that the listed building maintains its prominent position in street scene.

Public Benefits

- 6.10 Notwithstanding, any level of harm must be weighed against public benefits resulting from the scheme. Such benefits can be anything that delivers economic, social or environmental objectives as described in the NPPF and these public benefits are considered below.

Environmental objective

- 6.11 In this case, there will be significant public benefit to removing the existing poor quality buildings, particularly the light industrial units which have historically caused disturbance and parking issues for neighbouring residents. Along with significant uplift in biodiversity and landscaping across the site, the development will vastly improve the public realm in this location, the environment and visual quality of the surroundings. Flood risk on the site will be reduced, with flood resilient buildings which will be safe for their lifetime and the development will also contribute to reducing risk elsewhere by increasing flood storage capacity.

Social Objective

- 6.12 The scheme will also make a reasonable contribution to the Councils housing targets, particularly in the context of providing urban family sized homes, making a social contribution to the local area. The scheme makes a much more efficient use of the space in this context and are of a high quality design that will enhance the character of the area and sense of place for both future and existing neighbouring residents. The pre-application response also recognised the potential of the scheme to enhance the area: “In terms of design it is clear that this has been carefully considered and officers consider that although different to other developments in the vicinity it is an interesting scheme, which has the potential to improve the character and appearance of the site and the surrounding area. The materials and detailing proposed are considered to be of a high quality and create an attractive scheme.”

Economic Objective

- 6.13 Economically, the appeal proposal would generate employment opportunities during the demolition and construction phase, additional council tax and additional expenditure into the local economy. Whilst the existing land use will make contributions to the economy in this context to an extent, the proposed residential development of nine houses will still make a long term contribution.
- 6.14 Cumulatively, the various public benefits arising from the scheme would be significant, having regard to the existing poor quality of the site and the improvements that would be made. Therefore, in respect of the heritage balance it is considered that the less than substantial harm identified to the significance of the heritage asset would be demonstrably outweighed by the public benefits so as to amount to clear and convincing justification.

Planning Balance

- 6.15 Therefore, taking all these matters into account, on balance, it is considered that the development is acceptable in planning terms. Whilst it has been identified that the scheme cannot make any affordable housing contributions, the application provides the appropriate justification as to why this is not possible in this case. In addition, where a negligible/minor level of harm has been identified to the setting of the listed building, there are numerous and significant public benefits which outweigh this. These benefits also feed into the flood risk exceptions test — providing wider sustainability benefits to the community; which in combination with the fact the SSFRA demonstrates the safety and betterment resultant from the scheme as already described, demonstrates this test is also passed.
- 6.16 Therefore taking the development plan as a whole, the proposed scheme accords with the plan. The development accords with the policy guidance contained in the NPPF and addresses all other material considerations. The scheme is a high quality and sustainable development which should be approved without delay.

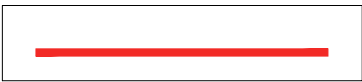
APPENDIX ONE – SITE LOCATION PLAN



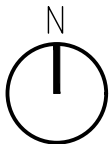
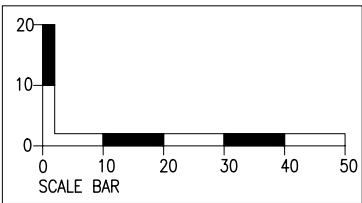
ALL DIMENSIONS MUST BE CHECKED ON SITE. INFORM THE ARCHITECT OF ANY DISCREPANCIES PRIOR TO CONSTRUCTION
INTERNAL LAYOUTS INDICATIVE

NOTES

1. WINDOW MULLION / PATIO GLAZING ARRANGEMENT INDICATIVE SUBJECT TO DETAIL DESIGN
2. SITE FOOTPRINT TAKEN FROM SURVEY. REST OF EXISTING PLAN, ELEVATION RIDGE AND EAVES HEIGHT OF IMMEDIATE NEIGHBOURING BUILDINGS FROM OS & APPROXIMATE
3. DO NOT SCALE OFF THIS DRAWING. FOR CONSTRUCTION ALL DIMENSIONS TO BE CHECKED ON SITE.
4. PROPOSED TREE LOCATIONS SHOWN INDICATIVELY
5. INFORM ARCHITECT OF ANY DISCREPANCIES PRIOR TO CONSTRUCTION



: SITE BOUNDARY



REV	DATE	DESCRIPTION	DRN	CHK
P01	25.01.21	FIRST ISSUE FOR REVIEW	DG	
P02	20.08.21	MINOR AMENDMENTS	DG	
P03	23.09.21	MINOR AMENDMENTS	DG	

Gouldstone
and Co.

CLIENT
RAYWOOD DEVELOPLMENTS LTD
PROJECT
2-4 SEND ROAD
CAVERSHAM, READING

DRAWING TITLE
EXISTING SITE LOCATION PLAN

SCALE 1:1250@A3 A3 SHEET

STATUS

PLANNING

DRAWING NO
SR_P_050
REV
P03

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APPENDIX TWO – PRE-APPLICATION RESPONSE

24 June 2021

Mrs M Quan
Boyer
Crowthorne House
Nine Mile Road
Wokingham
RG40 3GZ

Your contact is: Ms Claire Ringwood, Planning

Dear Mrs Quan,

PRE PLANNING APPLICATION ENQUIRY RESPONSE

Enquiry Reference: 210419

Address: 2-4 Send Road, Caversham, Reading, RG4 8EH

Proposal: Pre-application advice for the demolition of the existing buildings and erection of 9 dwellings with associated car parking and landscaping

Further to your pre-application request received on 16th March 2021 here is my advice in relation to your proposal. Apologies for the delay responding.

The following information was submitted:

Covering Letter

Pre-Application Design Study

Technical Note by ARK Environmental

Preliminary Daylight and Sunlight Assessment by XCO2

Heritage Statement by RPS Group

Pre-Application Transport Statement by Connect Consultants

Tree Survey Schedule by David Archer Associates

Drawing No: TCP -1 - Topographic Survey

Drawing No: Geo-20-090 - Topographical Survey

Visualisations Forge Close

Visualisations Send Road

Visualisations Send Road Focus Shot

Drawing No: SR_P_050 Rev P01 - Existing Site Location Plan

Drawing No: SR_P_060 Rev P02 - Proposed Site Location Plan

Drawing No: SR_P_100 Rev P03 - Proposed Ground Floor GA

Drawing No: SR_P_110 Rev P03 - Proposed First Floor GA

Drawing No: SR_P_120 Rev P04 - Proposed Second Floor GA

Drawing No: SR_P_130 Rev P03 - Proposed Roof Plan GA

Drawing No: SR_P_150 Rev P03 - Proposed Send Road Houses Typical Floor Plans
Drawing No: SR_P_160 Rev P02 - Proposed Send Road Houses Typical Floor Plans [*should be Forge Close*]
Drawing No: SR_P_200 Rev P02 - Proposed Send Road Site Section
Drawing No: SR_P_300 Rev P03 - Proposed Send Road Street Elevation
Drawing No: SR_P_301 Rev P03 - Proposed Forge Close Street Elevation
Drawing No: SR_P_310 Rev P04 - Proposed Send Road Typical House Elevation
Drawing No: SR_P_320 Rev P02 - Proposed Forge Close Typical House Elevation

The site is located to the south of Gosbrook Road and consists of an existing bungalow and a light industrial unit. The rear of the site backs on to Forge Close where there is boundary fencing separating the site from Forge Close. Forge Close is a cul-de-sac consisting of a bungalow and a row of 5 x 3 storey townhouses. The surrounding area is predominantly residential with a mix of types, styles and designs with a Grade II Listed Building to the north at 393 Gosbrook Road known as Ivy Farmhouse and other light industrial units at 3 and 6 Send Road and 389 Gosbrook Road (a current planning application is pending consideration on this site for 6 flats, application ref: 210279). The site is located within Flood Zone 3.

Proposal

The pre-application enquiry relates to the demolition of both no. 2 Send Road, which is a detached bungalow, and no. 4 Send Road, which consists of a number of light industrial buildings, and the erection of 9 houses, 4 fronting Send Road and 5 fronting Forge Close. The proposal consists of 7 x 3 bedroom and 2 x 2 bedroom houses creating two street frontages. The proposed houses fronting Send Road are two storey with accommodation in the pitched roof and the proposed houses fronting Forge Close are two storey (three with accommodation in the roof) and set back from the pavement by 5m in keeping with the positioning of the existing terrace of townhouses. Parking is provided by way of integral garages (measuring 6m x 3m) to the proposed Send Road houses and off-road parking (5m x 3m) for the proposed houses on Forge Close. 8 parking spaces are proposed along with rear amenity space.

Property History

2 Send Road

No planning history.

4 Send Road

98/00078/CLE (Civica Ref: 980466) - Use of the site for a light industrial, B1 use. Permitted 30/04/1998.

04/00141/FUL (Civica Ref: 040353) - Retrospective application for alterations to existing lean-to at rear and retention of new double-doors in front and rear elevations. (amended description). Permitted 15/12/2008.

140583/FUL - Single-storey rear extension for new store and carport. Permitted 19/06/2014.

2-4 Send Road

190980/OUT - Demolition of 2 & 4 Send Road. New development comprising of 14 x 1 bed flats and 2 x 2 bed flats. Access proposed from Send Road & Forge Close. Withdrawn 05/03/2020.

Consultation Responses

Transport

The site fronts both Send Road and Forge Close. The project seeks to create two new street frontages, one along Send Road and one along Forge Close.



Send Road forms the western boundary of the site and is currently part of a Resident's Permit scheme. Forge Close forms the eastern boundary of the site and is a residential cul-de-sac with a large three storey block of five houses to the south. Aside from the no waiting restrictions at the junction of Gosbrook Road/Forge Close, there are no parking restrictions in place on Forge Close.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone. In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 1 space per 2-bedroom dwelling house and 2 spaces per 3-bedroom dwelling house.

A total number of 8 parking spaces are provided for the development. Eight of the proposed houses have on-site parking for one car; and one of the two-bedroom houses has no on-site parking. The proposed parking provision is significantly less than the Council's adopted Parking Standards SPD which would require 16 parking spaces.

Policy TR5 of the Local Plan states ***“Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport”***. It is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway through on-street parking.

Whilst it is noted that the site is relatively close to the Caversham District Centre and has access to high frequency bus services, this is accounted for in the Council's zonal-based parking standards. Given the unrestricted nature of Forge Close, the shortfall in parking is likely to lead to a considerable amount of on-street car parking which is contrary to Policy TR5.

In addition to the parking concerns above, the following points should be noted if a full application is intended;

- The proposed access arrangements should be illustrated on the proposed site plan. Street furniture (e.g. sign posts, street lighting columns) should be a minimum distance of 1.0m from a vehicle crossing (top of transition kerb) to reduce risk of damage from turning vehicles.
- Visibility splays/sight lines should be acceptable to ensure safe access/egress from the property. Manual for Streets requires visibility splays of 2.4m by 43m for a 30mph road. I am concerned that the bin storage areas and steps to the houses on the Send Road frontage will obstruct visibility from the proposed garages.
- In order to comply with the Council's adopted Parking Standards and Design SPD, the internal dimensions of a single garages must comply to 7000mm long x 3000mm. Garages not complying to the standard dimension cannot be counted in the overall parking provision for the development. I am also concerned that vehicles will not be able to wait off the public highway while the garage doors are opening.
- The parking areas should be constructed in permeable materials so not to increase the surface water run-off from the site.
- In accordance with the adopted Parking SPD, the development is required to provide a minimum of 2 cycle parking spaces for each C3 dwelling.
- The Councils Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point.
- The applicant should ensure that the refuse storage provisions comply with the Council's Waste Management Guidance which is available to view online.

Natural Environment Trees

This site is located within the Air Quality Management Area therefore the natural environment criteria used to assess planning applications at this location will be given more weight in the decision, and large canopy tree species are expected to be provisioned for planting.

With reference to the Landscape and Biodiversity section of the Pre-Application Design Study dated March 2021, a wide range of soft landscape provisions are noted which is positive.

In terms of trees, it is expected that native species with medium or large crowns are selected as to maximise the increase of canopy cover. The Silver Birch mentioned on the plans is a good compromise between light penetration into the gardens and crown size - this species develops a medium crown but still allows some light to pass through it. On the northern boundary of the 'green corridor' area, shading due to large, dense crowns is not a concern anymore and tree species choice should be diversified accordingly. Planting location should also account for tree growth, both in terms of crown height and spread, as well as trunk thickness, as to avoid any far future conflicts with development - i.e. tree trunk growing into a fence once the tree reaches maturity due to having been planted too close to it.

With regards to the green roofs of the buildings on Forge Close, I note there is no access to it for maintenance or even watering (during draught periods) while the sloped surfaces will quickly evacuate excess water reserves after every rain. Any future full planning application should demonstrate suitability and sustainability of such a provision with clear and simple solutions for maintenance and, more importantly, watering of the green roof.

The choice of a sedum blanket for the green roofs is the least biodiversity valuable option and exploring more diverse and species rich alternatives is expected.

If the proposed provisions (green roofs, planters, lawn and tree planting) are deemed sustainable, it will all work together to increase the efficiency of the SuDS scheme on site, which is positive. A total redevelopment of the site is expected to be designed in such a way to include green cover from the beginning, so rain water runoff is delayed and retention maximised.

The applicant is advised to establish the soil conditions prior to determining foundation design of the approved development in order to ensure that foundations are appropriately designed to take into account soil types that are subject to seasonal volumetric change (high clay content) as a result of the specific trees and vegetation present in the vicinity. Foundation design should take into account the potential effect of adjacent vegetation, based on its dimensions at maturity, in order to minimise the chance of future vegetation related subsidence.

This proposal shows good incentive to include various greening solutions which is positive in principle, but a future full planning application must demonstrate sustainability of each provision. Furthermore, a diverse tree species choice focused on maximising the ultimate crown size possible on site is expected in order to meet our Tree Strategy Objective 5 (canopy cover increase) and the demands for a site within an Air Quality Management Area.

Reading Borough Council Conservation & Urban Design Officer

It is considered that the impact on the listed building would be acceptable. The proposal is set back and the new terraces have been split into two smaller rows of new buildings. The main concern is the overall height.

The bulk and scale of the dormer windows is generally too oppressive. The height should be reduced and the detailing more subtle and more refined. The brick on edge is too bulky. Traditionally the dormer is set back from the gutter line at least 600mm. This applies to all of the dormers.

While certain parts of the scheme are well done it is considered that the density may be too high, i.e. too many units for the site, and there are some concerns about the way the street is addressed along Send Road. The terrace concept for Send Road is understood, but should there be a small front garden area in front in between the garage elements? The dormers need to be more subservient so the scheme appears to be 2 storeys plus dormer accommodation. By comparison in a conservation area, dormers or skylights facing the street would not be acceptable.



There still needs to be work done on the impact on the street areas, especially the dormer areas. There still needs to be some refining of the design, to make it less bulky. There are some good elements within the concept, but it is really: two storeys with a mansard in the roof level. Is this acceptable within the area? These are planning questions.

Ecology

The pre-application site comprises a bungalow and an adjacent commercial garage which it is proposed to demolish and replace with 9 dwellings and associated car parking and landscaping. The surrounding area is largely residential and contains gardens with tree lines which connect in the wider landscape to the River Thames to the south of the application site which offer good foraging opportunities for bats.

The buildings may contain features that could be suitable for use by roosting bats and, due to the location of the site and the extent of the works, there is a risk that the proposals may affect roosting bats and a bat survey report will need to be submitted with the application. The report should also details if there are any other ecological constraints to the proposals.

There are also opportunities to enhance the site for wildlife. The Planning Pre-Application Design Statement shows planting on the roof tops and integrated bird and bat boxes into the new buildings which is welcomed. This should be encouraged, and it will be important that this is not omitted from future iterations of the plans.

Environmental Health

Noise impact on development

The front façade of the development could be affected by noise from the surrounding commercial activities.

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (L_AMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

It may be possible through clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to

avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB LAeq,8hour	
Living rooms (07:00 - 23:00)	<35dB LAeq,16hour	
Gardens & Balconies	<50dB LAeq,T	<55dB LAeq,T

Bin storage - pest proofing

There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. Developers should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin.

Re-development of land - pest control

Where development will be taking place on sites with a former land use, particularly with a former drainage network, you are advised to ensure that former unused drains have been removed and / or properly capped or the proposed development may be at risk of rodent ingress.

It is likely that rats will occupy a cleared site. If there is a significant gap between site clearance and re-development, it is recommended that baiting be carried out to eradicate rats prior to redevelopment. This is to prevent rat populations which may be disturbed due to the redevelopment of the site causing subsequent problems to residents and businesses in the local area.

Contaminated Land

Ideally a 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.

Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.

It is possible that the desk study will recommend further intrusive site investigation, if consent is given the further investigation will be required by condition, along with a condition for a remediation strategy and a condition for validation certification that remedial works have been successfully completed. The remediation strategy shall be submitted and approved prior to development and the validation certification prior to occupation. If no contamination is found by the intrusive investigations, then all conditions will be discharged.

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

A scheme should be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.

The hours of noisy construction, demolition and associated deliveries should be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays.

No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development hereby approved should be burnt on site.

Environment Agency

We are no longer able to respond to you directly for pre-applications where you consult us on behalf of a developer. You will be aware we are now charging for non-statutory planning advice to ensure we cover costs. We continue to provide responses to statutory consultations from local planning authorities on validated planning applications free of charge. However, we do charge for detailed planning advice to planning enquiries that we receive from developers. Therefore, we cannot provide bespoke comments on your enquiry at this stage.

We have attached our pre-application advice note which provides information and guidance about issues within our remit at the planning application stage and we would be grateful if you forward this to your customer.

We encourage customers to come to us directly for advice where there are constraints within our remit as we still want to influence sustainable development. We will provide customers with further bespoke advice, if required, at a chargeable rate. This includes reviews of technical documents, meetings and site visits. Our charges will be £100 per hour + VAT.

We recommend that your customer contacts us directly at planning_THM@environment-agency.gov.uk

Relevant Planning Policy and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) which states at paragraph 11 “plans and decisions should apply a presumption in favour of sustainable development”.

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

National Planning Policy Framework

National Planning Policy Guidance

Reading Borough Local Plan (Nov 2019)

CC1 (Presumption in Favour of Sustainable Development)

CC2 (Sustainable Design and Construction)

CC3 (Adaptation to Climate Change)
CC5 (Waste Minimisation and Storage)
CC6 (Accessibility and the Intensity of Development)
CC7 (Design and the Public Realm)
CC8 (Safeguarding Amenity)
EN1 (Protection and Enhancement of the Historic Environment)
EN12 (Biodiversity and the Green Network)
EN14 (Trees, Hedges and Woodland)
EN15 (Air Quality)
EN16 (Pollution and Water Resources)
EN18 (Flooding and Drainage)
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/guidance

Sustainable Design & Construction SPD (2019)
Revised Parking Standards and Design SPD (2011)
Planning Obligations under Section 106 SPD (2015)
Affordable Housing SPD (2021)
Tree Strategy for Reading (March 2021)
Technical Housing Standards - Nationally Described Space Standard (DCLG, 2015)

APPRAISAL

Main Issues

- Principle of development
- Flooding
- Housing Mix
- Design, character & impact on the adjacent Listed Building
- Residential amenity
- Transport matters
- Natural Environment
- Sustainability
- Section 106 - Affordable Housing
- CIL
- Equality Act
- Other matters - Validation requirements

Principle of development

Policy EM3 seeks to ensure the overall level of employment land is maintained. Although 2-4 Send Road is not located within a Core Employment Area, Policy EM3 states that in other areas, the following matters will be considered when assessing proposals which would result in a loss of employment land:-

- (i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?
- (ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
- (iii) Is there a surplus of a similar size and type of accommodation in Reading?
- (iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
- (v) Is the need for alternative uses stronger than the need for the retention of employment land?
- (vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

The site is easily accessible with good links into and out of Reading. The site is located within a predominantly residential area and although there are a number of light industrial units close by (and there is a pending planning application at 389 Gosbrook Road to the north of the site for the construction of 6 flats). The covering letter also states that the building is in a state of disrepair and the cost of redeveloping it for an employment use would not be viable given that it is not a desirable location for an employment use and such uses can have a detrimental impact on neighbouring residential amenities and Officers are minded to agree with this. Notwithstanding this, the loss of employment land in this instance is considered acceptable due to its location in a predominantly residential area subject to meeting the relevant planning policies and other material considerations as detailed below. The principle of residential development will need to be considered in light of the sites location in Flood Zone 3.

Flooding

The site is located in Flood Zone 3 (High Flood Risk) and any future application would need to meet relevant national and local planning policy, which requires development to be “*directed to area at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change*” (Policy EN18).

The Flood Risk and Drainage Technical Note provided with the pre-application enquiry states the Environment Agency have been consulted and a suitable drainage solution has been found which has been agreed with the Environment Agency. The Environment Agency will be consulted should a planning application be submitted however they no longer respond to Local Planning Authorities consultation requests for pre-application enquiries. Any proposal would need to satisfactorily meet the Sequential and Exceptions Tests and it would need to be demonstrated that the proposed development could be constructed and operated safely in flood risk terms.

Housing Mix

Policy H2 states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms.

The scheme comprises 9 houses:

- 7 x 3 bedroom (4 person)
- 2 x 2 bedroom (3 person)

Given the number of units proposed it is considered that the mix of units is acceptable and houses instead of flats are welcomed.

Design, character & impact on the adjacent Listed Building

Policy CC7 states that *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*. The NPPF in paragraph 127 c) states that planning policies and decisions should ensure that developments *“are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”*.

Policy EN1 states that *“historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced”*.

A Heritage Statement has been submitted with the pre-application enquiry and the proposed design has clearly taken in to consideration the listed building at Ivy Farmhouse by creating the “green corridor” in the middle of the scheme which opens up the site and provides views through. Detailing and materials have also been designed and specified to reflect elements of the listed building and the surrounding properties and the roof of the closest property on Forge Close hipped away from the listed building. The Heritage Statement concludes that the impact of the proposal is mitigated by the terraces addressing the roads to the east and west leaving a newly undeveloped strip of open land through the middle and that there is a negligible/minor level of harm to the listed building. The Council’s Conservation & Urban Design Officer also concluded that the impact on the listed building would be acceptable.

In terms of design it is clear that this has been carefully considered and officers consider that although different to other developments in the vicinity it is an interesting scheme, which has the potential to improve the character and appearance of the site and the surrounding area. The materials and detailing proposed are considered to be of a high quality and create an attractive scheme. However, the comments of the Conservation & Urban Design Officer need to be taken into account in refining the design for submission, in particular with respect to the size of the dormers, which are considered to be oppressive and bulky, and should be more subservient, in order that the scheme would appear more as a 2 storey with dormer windows within the roof.

The proposed houses do not have any rear facing windows from habitable rooms although there seem to be some windows to stairs/landings which would be conditioned to be obscure glazed with high level window openings (if proposed to be openable). However all the bathrooms are to the rear and no windows are proposed. Natural ventilation is considered better than mechanical ventilation and there is opportunity to introduce windows to the bathrooms which again could be obscure glazed with high level window openings to protect the privacy of neighbouring properties.

Although the Send Road frontage would extend forward of the existing building line this is not considered unacceptable as there is a significant distance between the residential properties to the south of the site, which are separated by a light industrial building. It is noted that the proposed scheme at 389 Gosbrook Road is also set forward. The Conservation & Urban Design Officer has raised a concern with the street presence to Send Road and suggests the inclusion of a small front garden area to these properties.

In general, the proposed design is considered acceptable and is not considered harmful to the character and appearance of the surrounding area, however, there are other matters addressed

below with regards to the size of the rear amenity space and under provision of parking which are indications that the proposal could be an overdevelopment of the site.

Residential amenity

Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

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

Impact on neighbouring amenity

It is clear that consideration has been given to the location of the proposed houses, orientation, location of windows, distances between boundaries and a design to reduce the impact on neighbouring properties. No side windows are proposed in order to protect the privacy of neighbouring properties, however at 399 Gosbrook Road is a bungalow with windows within the elevation fronting Forge Close, and it would need to be demonstrated within any formal submission that that there would be no loss of privacy/overlooking to this property.

Due to the orientation of the proposal there is not considered to be any harm in terms of loss of sunlight and daylight to neighbouring properties as concluded in the daylight and sunlight assessment. Although the proposed houses would be clearly visible it is not considered that they would be harmful to the outlook for the residents of neighbouring properties. The covering letter highlights the planning application north of the site at 389 Gosbrook Road which is for the demolition of the existing buildings and the construction of a new residential building for 6 flats. Any future planning application would need to have regard to this development, however the submitted plans show there is a car park between the proposed building at 389 Gosbrook Road and the closest proposed house on Send Road, with an approximate distance of approximately 14m side to side.

Amenity of proposed dwellings

In addition to policy CC8 above, policies H5 (Standards for New Housing) and H10 (Private and Communal Outdoor Space) also apply. Policy H5 states that new build housing will need to comply with the nationally-prescribed space standard.

The submitted information states all the houses will be two storey in height with a bedroom provided in the roofspace. 4 x 3 bedroom / 4 person houses are proposed on Send Road which are approximately 96sqm which is above the 84sqm required in Policy H5 for a two storey dwelling and in line with the National Space Standards.

The houses on Forge Close propose 3 x 3 bedroom / 4 person houses and 2 x 2 bedroom / 3 person houses. It is noted that the 3 bedroom houses measure approximately 90sqm which meets the required 84sqm required in Policy H5 for a two storey dwelling which is also in line with the National Space Standards, however, I cannot see the size of the 2 bedroom houses to assess whether these meet the space requirement of 70sqm.

All bedrooms meet the standard space requirements and it is assumed that the submitted plans take into account any headroom less than 1.5m (particularly the bedrooms in the roofspace). If this is not the case and the usable floor space is less than required this would need to be addressed in any future planning application.

There is a distance of 16m back to back between the upper floors of the proposed houses and 12m at ground floor level. Policy CC8 of the Reading Borough Local Plan states that *“the position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20m between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy”*. The proposed scheme has been designed so that there are no habitable windows to the rear of the proposed houses at first or second floor. Rear elevations have not been provided but from the floor plans there are windows to stairs and landings and as mentioned previously there is the opportunity to add windows to the bathrooms which would add more interest to the rear elevations particularly on the Forge Close properties. Through design the proposal has demonstrated that there would not be a detrimental impact on privacy for future residents of the houses at Send Road or Forge Close.

In terms of daylight and sunlight an assessment has been submitted which concludes that the proposal performs well in relation to daylight and sunlight access for windows and amenity spaces in general and there are no significant impacts to daylight and sunlight on surrounding properties and amenity spaces. As such, this is considered acceptable.

Policy H10 sets out that *‘Dwellings will be provided with functional private or communal open space... Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.’* Policy H10 also goes on to state that *“the design of outdoor areas will respect the size and character of other similar spaces in the vicinity”*.

Paragraph 4.4.87 of Policy H10 sets out that in the past, 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).

The submitted scheme provides rear amenity space measuring 40sqm and 35sqm for the properties at Send Road and Forge Close respectively. This is significantly below the requirement in policy H10 and the proposed gardens are significantly smaller than those of neighbouring properties within the vicinity and this is an indication that the proposal for 9 houses is an overdevelopment of the site. A scheme for fewer houses would likely enable a more policy compliant position to be achieved. If a future planning application is submitted for 9 houses then clear justification would need to be provided as to why non-compliance with Policy H10 should be considered. The need for private amenity space has been more in focus following the Covid pandemic with much greater importance on provision.

The proposal has been designed to ensure all the internal circulation spaces and room sizes are as per Approved Document M, Part M4(2).

Due to the tight nature of the site, should any future planning application be approved the decision would likely include conditions to remove certain permitted development rights for extending the properties i.e. extensions to the properties and the roofs, outbuildings and retaining the garage/parking spaces for parking.

It is noted that an Air Quality Assessment would be submitted with any future planning application and Environmental Protection have also advised in their comments above that a Noise Assessment and a Phase 1 Desk Study would also be required with any future submission. In terms of noise, the proposed houses would be adjacent and opposite light industrial units and it is expected that any noise related issues from the units would be highlighted in the Noise Assessment.

Transport matters

Transport's full comments are detailed above and the level of parking is one of the main concerns with the proposed scheme. Although a Transport Statement has been submitted, the Council's Transport section highlights that 16 car parking spaces would be required for the proposed development and 8 are currently proposed. Whilst it is noted that the site is relatively close to the Caversham District Centre and has access to high frequency bus services, this is accounted for in the Council's zonal-based parking standards. Given the unrestricted nature of Forge Close, the shortfall in parking is likely to lead to a considerable amount of on-street car parking which is contrary to Policy TR5. Notwithstanding this the size of the proposed garages do not meet the Council's standard size of 7m x 3m and cannot therefore be counted as car parking spaces. Other points are raised in the Transport comments, however, the main concern is the under provision of parking and at the present time it does not seem that the scheme could provide the parking required to make it acceptable based on the number of units presented.

Natural Environment

Natural Environment Tree and Ecology comments are detailed in full above. In general, the comments are positive, however, as the site is within an Air Quality Management Area large canopy tree species are expected to be provisioned for planting. The wide range of soft landscaping is positive, however, consideration needs to be given to the type of species proposed and to ensure there would be no future conflicts with the development and trees planted.

The Natural Environment Tree officer commented that there is no access to the green roofs and any future planning application should demonstrate how these green roofs would be maintained. They also question the choice of sedum and ask for more diverse and species rich alternatives to be investigated.

A bat survey would also be required should a planning application be submitted.

Sustainability

Policy H5 (Housing Standards) requires that all new build housing integrate additional measures for sustainability. In light of this, a condition would be recommended in any future planning application to ensure the development meets the following requirements:

- Higher water efficiency standards under Regulation 36(3) of the Building Regulations; and
- New build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate as defined in the 2013 Building Regulations.

Although part of a planning condition, these requirements would normally be administered through Building Regulations. It is noted that energy and sustainability have been acknowledged in the submitted Design and Access Statement and renewable technologies would be incorporated into the design, which is welcomed.

Section 106

Affordable Housing

Policy H3 of the Reading Borough Local Plan states that residential development will make an appropriate contribution towards affordable housing to meet the needs of Reading. On sites of 5-9 dwellings, a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough. The covering letter submitted with the pre-application enquiry states this requirement is noted and will be addressed in the formal planning application.

If a viability assessment, seeking to justify a less than policy compliant contribution, were submitted at the application stage then it would be reviewed by the Council's Valuer. The current fee for a review of a submitted Viability Assessment for this scale of scheme is £4,000. The Council has recently adopted an amended Affordable Housing SPD which is available to view on the Reading Borough Council website [Planning policy - Reading Borough Council](#)

CIL

Should a planning application be submitted the proposal would be liable to the Community Infrastructure Levy regime that is applicable to all decisions for planning applications made from the 01/04/2015. The current CIL rate for C3 residential is £156.71 per sqm (2021).

Equality Act

In determining applications the Council are required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence (including from consultation on the current pre-application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular pre-application.

Other matters

Validation requirements

Should an application be submitted documents should be submitted in accordance with the requirements as set out in the Council's Validation Checklist:

https://images.reading.gov.uk/2019/12/Validation_Checklist_Final_Dec_16.pdf

Conclusion

The principle of the loss of employment land is considered acceptable and in general the principle of residential development is likely to be acceptable, however, the main concerns relates to the under provision of parking, small rear amenity space and whether the proposal for 9 houses is an overdevelopment of the site. The proposal in terms of its design and through consultation responses would need to be addressed. I note the request for the proposal to be taken to the Design Review Panel. If you would like to take the proposal then I am happy to arrange this for you.

The submitted covering letter specifically requests advice on:

1. The acceptability in principle of the proposed residential use and housing mix;
2. The acceptability of the proposed design and scale of the building;
3. Confirmation of our approach to technical matters such as access, parking and trees; and
4. Confirmation of the content of the planning application

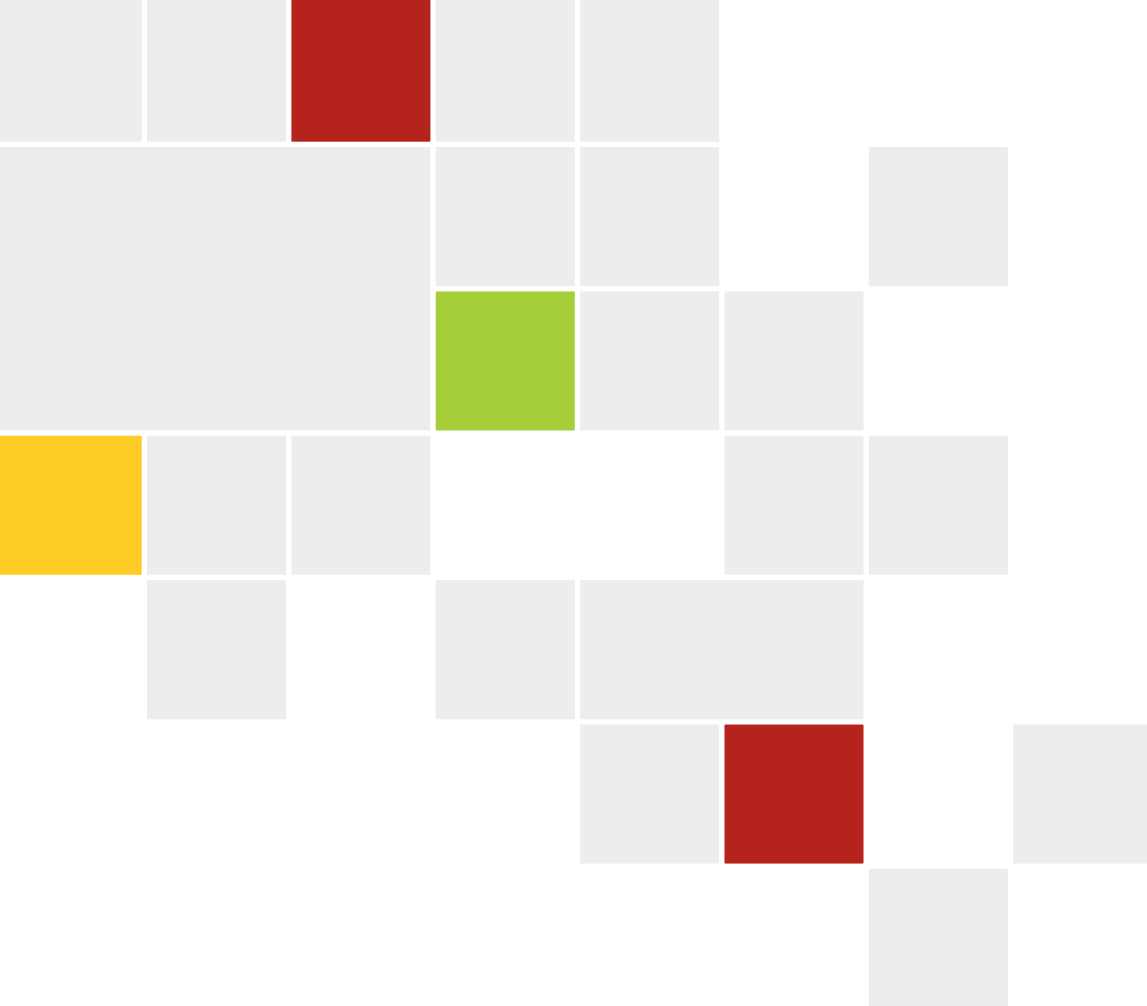
All the above points are considered to have been addressed in the response above and any additional requirements at application stage highlighted above.

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

Yours sincerely

p.p. *A. Amoah*

Ms Claire Ringwood
Planning Officer



Boyer

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