

Ref: 18009.9.1_22.08.01_PS

Project: **Residential Development**

Site Address: **Carlisle House**, 118 Oxford Road, Reading, RG1 7NG.

Client: **Turner Property Ltd**

Document Title: **Planning Statement**

Author: CW / Checked: CW

1.0 - INTRODUCTION

This Statement is written as a supporting document for a Full Planning and Listed Building Consent Application to Reading Borough Council associated with development at Carlisle House, 118 Oxford Road, Reading, RG1 7NG.

The development proposals involve comprehensive refurbishment and change of use from 4no. dwelling flats (C3a use) to become 6no. dwelling flats (C3a use). The expansion of accommodation is enabled by:

- Internal layout modification
- Refurbishment of the existing lower ground floor rooms
- Extension of the existing second floor in-roof accommodation

In addition to the existing building refurbishment and alteration works, the following associated elements are proposed:

- Boundary treatment improvements
- Construction of plant room and cycle store out-buildings
- Comprehensive hard and soft landscaping improvements

The existing residential accommodation is not of high quality and many building elements are in a poor dilapidated state requiring comprehensive repair or replacement.

The development proposals will:

- Enhance the appearance and setting of the listed building along with the appearance of the wider Conservation Area
- Provide significant improvements to the quality of residential accommodation
- Deliver more effective use of the existing building, expanding the amount of residential accommodation assists to financially enable the required refurbishment and ensure the longer-term sustainability for upkeep of the heritage asset.

2.0 - SUPPORTING DOCUMENTS

This statement should be read in conjunction with the completed application and CIL questions forms along with the following application supporting documents.

Weston & Co Architects:

18009.9.1_22.07.29_DAS Design, Access & Heritage Statement
18009_9.1_22.03.25_PS_Photographic Survey
18009-PL-01 Location and Block Plans
18009-PL-02 Existing Site Plan
18009-PL-03 Proposed Site Plan
18009-PL-04 Existing Lower Ground and Ground Floor Plans
18009-PL-05 Existing First and Second Floor Plans
18009-PL-06 Existing West and South Elevations
18009-PL-07 Existing East and North Elevations
18009-PL-08 Proposed Lower Ground Floor Plan
18009-PL-09 Proposed Ground Floor Plan
18009-PL-10 Proposed First Floor Plan
18009-PL-11 Proposed Second Floor Plan
18009-PL-12 Proposed Roof Plan
18009-PL-13 Proposed West Elevation
18009-PL-14 Proposed South Elevation
18009-PL-15 Proposed East Elevation
18009-PL-16 Proposed North Elevation
18009-PL-17 Existing & Proposed Boundary Wall Elevations
18009-PL-18 Proposed Cycle Store & Plant Room Elevations
18009-PL-19 Proposed South Elevation – Rendered
18009-PL-20 Existing Roof Plan
18009-PL-21 Existing North Elevation
18009-PL-22 Existing Section AA & BB
18009-PL-23 Existing Lightwell Sections
18009-PL-24 Proposed North Elevation
18009-PL-25 Proposed Section AA & BB
18009-PL-26 Proposed Lightwell Sections
18009-PL-27 Proposed Cycle Store Street Elevation
18009-PL-28 CIL Existing Floor Area Plans
18009-PL-29 CIL Proposed Floor Area Plans

Designer Landscapes:

Garden Design Statement
Landscape Plan
Planting Plan P1
Planting Plan P2
Planting Plan P3
Planting Plan P4

S J Stephens Associates:

1621_Arboreal Impact Assessment 21.03.22
1621-02A_Tree Protection Plan

John Wenman Ecological Consultancy:

R2496d_Preliminary Ecological Assessment

3.0 - PLANNING POLICY CONTEXT

The following national and local planning policies relevant to the proposed development are scheduled below:

National Planning Policy Framework 2021 (NPPF)

Paragraph 11 of the NPPF is the significant national planning policy principle relevant to the development proposals. Paragraph 11 relates to the presumption in favour of sustainable development Local Authority plan-making and decision-taking. The NPPF states the following key policy for decision-taking by Local Authority planning departments:

approving development proposals that accord with an up-to-date development plan without delay; (NPPF, para 11c)

Reading Borough Local Plan, Adopted November 2019

The Local Plan is the published document adopted to guide development in the Reading Borough up to 2036. In accordance with the NPPF the Local Plan has a particular emphasis on delivering sustainable development.

The following policies have been identified within the Local Plan relevant to the planning application development proposals:

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design & Construction
- CC3: Adaptation to Climate Change
- CC5: Waste minimisation and Storage
- CC6: Accessibility and the Intensity of Development
- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- EN1: Protection and Enhancement of The Historic Environment
- EN3: Enhancement of Conservation Areas
- EN12: Biodiversity and the Green Network
- EN14: Trees Hedges and Woodland
- EN15: Air Quality
- EN18: Flooding and Drainage
- H1: Provision of Housing
- H3: Affordable Housing
- H8: Residential Conversions
- H10: Private and Communal Outdoor Space
- TR1: Achieving the Transport Strategy
- TR5: Car and Cycle Parking and Electric Vehicle Charging

4.0 - LOCAL PLAN POLICY COMPLIANCE SUMMARY

A summary is provided below describing how compliance with the above scheduled policies is achieved by the development proposals described by the complete application submission supporting documents information package.

CC1: Presumption in Favour of Sustainable Development

The Local Plan mirrors the fundamental sustainable development policy which under-pins the NPPF. Local Plan policy CC1 states:

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Residential use is already long established within the majority of the existing building on the application site which is located within a very sustainable location close to Reading town centre.

Further clarifications on how the proposed scheme complies with other relevant Local Plan policies which contribute to establishing the development as sustainable are described within the relevant policy sub-sections below and elsewhere within the Design and Access statement.

CC2: Sustainable Design and Construction

Local Plan policy CC2 states:

Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

For new residential dwellings the policy CC2 confirms that sustainable design and construction compliance is described by the content of the Sustainable Design and Construction Supplementary Planning Document (Adopted 2019).

Clarifications on how the proposed scheme complies with policy CC2 and the associated SPD can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 13.0

CC3: Adaptation to Climate Change

Local Plan policy CC3 states:

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;*
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;*
- Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and*
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change*

Clarifications on how the proposed scheme complies with policy CC3 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:13.0
- Designer Landscapes: Garden Design Statement & Landscaping Plans

CC5: Waste minimisation and Storage

Local Plan policy CC5 states:

Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.

A construction method statement which details measures for waste minimisation during the construction phase of development has not yet been prepared for the application submission. It is requested that any requirement for this information be reserved for a pre-commencement condition to planning approval.

Further clarifications on how the proposed scheme complies with policy CC5 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 13.0

CC6: Accessibility and the Intensity of Development

Local Plan policy CC6 states:

The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility.

The site currently has one dedicated pedestrian and cycle access to Oxford Road and one dedicated vehicular access point from Trinity Place, there are no material alterations to access proposed due to the current provision being suitable for the modest increase in building occupancy on this site located in a very sustainable location.

CC7: Design and the Public Realm

Local Plan policy CC7 states:

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. The various components of development form, including: -

- Layout: urban structure and urban grain;*
- Landscape;*
- Density and mix;*
- Scale: height and massing; and*
- Architectural detail and materials*

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- Character - a place with its own identity and sense of place*
- Continuity and enclosure*
- Quality of the public realm and provision of green infrastructure and landscaping*
- Ease of movement and permeability*
- Legibility - clear image and easy to understand*
- Adaptability – capable of adaptation over time*
- Diversity – meets a wide range of needs.*

Developments will also be assessed to ensure that they: -

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

High quality development proposals are described by the application submission which will enhance the appearance of the building and wider conservation area whilst also providing additional and improved residential accommodation which can assist in securing the future viability for the heritage asset. The scheme sensitively references interesting and attractive elements of the existing building to create an attractive and succinct proposal.

Further clarifications on how the proposed scheme complies with policy CC7 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 7.0, 8.0, 9.0 and 10.0
- Designer Landscapes: Garden Design Statement & Landscaping Plans

CC8: Safeguarding Amenity

Local Plan policy CC8 states:

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, where the proposals involve new development of more than 8 storeys.*

Clarifications on how the proposed scheme complies with policy CC8 are described below:

- Habitable rooms within the proposed new dwellings are provided with windows in order to allow sufficient sunlight and daylight.
- The proposed extension to the second-floor residential accommodation roof volume does not present any material overshadowing or overbearing effect on the neighbouring site.
- The proposed development does not present any material harm to the outlook from habitable rooms of adjacent residential dwellings

Further clarifications on how the proposed scheme complies with policy CC8 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 13.0

EN1: Protection and Enhancement of The Historic Environment

Local Plan policy EN1 states:

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

The existing building at Carlisle house is in relatively poor condition with meaningful refurbishment works not having been carried out for many years. In order to provide a more viable long-term future for the listed building's condition, additional habitable residential accommodation is being proposed within the lower ground and the second floors as enabling development for the proposed comprehensive improvement and refurbishment works.

The proposed development will have the effect of providing an overall enhancement to the listed building by repairing some of the harmful elements of work carried out during the previous conversion works.

Externally, there are significant enhancements proposed to the listed building's setting, comprising: the new hard and soft landscaping works, introduction of new gates and boundary treatments to the southern and eastern boundaries.

There are no proposed works which will have an adverse effect on the significant architectural features which create the building's architectural interest.

Further clarifications on how the proposed scheme complies with policy EN1 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, sections: 2.0, 3.0, 4.0, 5.0, 6.0, 7.0, 8.0
- Designer Landscapes: Garden Design Statement & Landscaping Plans

EN3: Enhancement of Conservation Areas

Local Plan policy EN3 states:

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. These may include:

- *Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture;*
- *Restoring original building features;*
- *Removing inappropriate additions or alterations to buildings;*
- *Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;*
- *Improving signage and street furniture;*
- *Restoring or re-establishing appropriate paving, railings or walls;*
- *Sympathetic landscaping and planting;*
- *Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;*
- *Signage that reveals and promotes the Conservation Area and its boundaries;*
- *Interpretation panels to inform the public of the area's historical significance.*

It is proposed to create a positive enhancement to the distinctive character of the Russell Street and Oxford Road Conservation Area in the following ways:

- The external appearance of Carlisle House is to be improved by removing non-original building features which clutter the elevations including: the fire escape, foul drainage pipes, non-original windows and doors.
- The non-original poor quality boundary treatment to the Oxford Road frontage is to be replaced.

- The non-original poor quality vehicle access gate facing Trinity Place is to be replaced with a high-quality gate.
- The large self-seeded Sycamore trees which are currently causing significant harm to the retaining wall on the Trinity Church boundary, creating major overshadowing issues and obscuring the views in and out of the site are proposed for removal. More appropriate replacement tree planting is proposed as part of a new high quality garden scheme which will significantly enhance the setting of the building and the views in and out of the site.

Further clarifications on how the proposed scheme complies with policy EN3 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:2.0, 3.0, 4.0, 5.0, 6.0, 7.0, 8.0
- Designer Landscapes: Garden Design Statement & Landscaping Plans

EN12: Biodiversity and the Green Network

Local Plan policy EN12 states:

On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

Further clarifications on how the proposed scheme complies with policy EN12 can be found within the following application supporting documents:

- John Wenman Ecological Consultancy: Preliminary Ecological Appraisal ref: R2496d
- SJ Stephens Associates: Arboricultural Impact Assessment ref: 1621
- Designer Landscapes: Garden Design Statement & Landscaping Plans
- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 13.0

EN14: Trees Hedges and Woodland

Local Plan policy EN14 states:

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

As part of the development, it is proposed for existing self-seeded Sycamore trees which are causing damage to the boundary retaining wall with Trinity Church to be removed and replaced with a more appropriate tree planting scheme.

Further clarifications on how the proposed scheme complies with policy EN14 can be found within the following application supporting documents:

- SJ Stephens Associates: Arboricultural Impact Assessment ref: 1621
- Designer Landscapes: Garden Design Statement & Landscaping Plans

EN15: Air Quality

Local Plan policy EN15 states:

Development should have regard to the need to improve air quality and reduce the effects of poor air quality...

ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.

The application site is located within the Reading Borough Air Quality Management Area.

Clarifications on how the proposed scheme complies with policy EN15 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:12.0

EN18: Flooding and Drainage

Local Plan policy EN18 states:

Development will be directed to areas 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...Wherever possible, development should be designed to reduce flood risk, both on- and off-site.

The application site is located outside any identified flood risk areas.

Further clarifications on how the proposed scheme complies with policy EN18 can be found within the following application supporting documents:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:13.5

H1: Provision of Housing

Local Plan policy H1 states:

Provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.

The proposed development complies with policy H1 by presenting the opportunity for 2no. additional new dwellings to be delivered as a contribution toward the Reading Borough target of 689 dwellings per annum until 2036.

H3: Affordable Housing

Local Plan policy H3 states:

Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading

on sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.

It has been identified that any affordable housing contribution would be provided by financial contribution relative to the 2no. additional dwellings proposed on the lower ground and second floors (Unit 1 and Unit 6 respectively).

H8: Residential Conversions

Local Plan policy H8 states:

Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:

- *The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;*
- *The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;*
- *There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*
- *There is no inappropriate stacking and location of rooms between units;*
- *Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and*
- *The resulting property or properties would provide adequate internal floorspace and headroom for residents.*

The proposed development scheme meets the requirements of policy H8 as described below:

- The scale of the proposed development is consistent with the size of the existing building with a modest increase of building volume proposed.
- There is no loss of single-family housing proposed. An increase in number of two-bedroom units is proposed which would be suitable for family occupation.
- There would be no adverse amenity impacts on residential neighbours to the site arising from the development proposals.
- Wherever possible it has been proposed to stack common room uses within the development plans. Due to the inherent layout constraints of the existing listed building it has not been practical to stack common uses in all locations. As part of the construction works a robust solution will be proposed for acoustic upgrade of the existing separating floors which will manage the issue of noise disturbance between units above and below.
- A bin storage area is proposed to accommodate 2no. 1100 litre 4-wheeled bins for refuse and mixed recyclables to meet the requirement of the 6no. dwelling flats.
- The proposed dwelling flats all have internal floor areas comfortably above the sizes defined by Nationally Described Space Standard, and have ceiling heights above 2.2 metres.

H10: Private and Communal Outdoor Space

Local Plan policy H10 states:

Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.

The design of outdoor areas will respect the size and character of other similar spaces in the vicinity, clearly identify whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.

High quality functional communal external green amenity space is provided for the proposed dwelling flats. In addition, private external amenity space is provided for the 2no. 2-bedroom flats.

Further clarifications on how the proposed scheme complies with policy H10 can be found within the following application supporting document:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:4.5
- Designer Landscapes: Garden Design Statement & Landscaping Plans

TR1: Achieving the Transport Strategy

Local Plan policy TR1 states:

Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans.

Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures.

All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application.

The proposed development contributes appropriately toward meeting the standards of the current Revised Parking Standards Supplementary Planning Document (Adopted 31st October 2011). There is a shortfall in car parking space numbers proposed however this should be considered appropriate due to the site's location, inherent constraints and the standards set-out in the SPD being outdated and significantly at odds to the Local Plan's sustainability and clean transport strategy ambitions.

There is an over-provision of 6no. secure and sheltered cycle storage spaces proposed which is above the 3no. required by current local policy. The over-provision will help promote a clean transport strategy and physical well-being for the occupants.

Further clarifications on how the proposed scheme's transport strategy complies with policy TR1 can be found within the following application supporting document:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section:4.0

TR5: Car and Cycle Parking and Electric Vehicle Charging

Local Plan policy TR5 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.

The proposed development contributes appropriately toward meeting the standards of the current Revised Parking Standards Supplementary Planning Document (Adopted 31st October 2011). There is a shortfall in car parking space numbers proposed however this should be considered appropriate due to the site's location, inherent constraints and the standards set-out in the SPD being outdated and significantly at odds to the Local Plan's sustainability and clean transport strategy ambitions.

There is an over-provision of 6no. secure and sheltered cycle storage spaces proposed which is above the 3no. required by current local policy. The over-provision will help promote a clean transport strategy and physical well-being for the occupants.

Further clarifications on how the proposed scheme's transport strategy complies with policy TR1 can be found within the following application supporting document:

- Design, Access & Heritage Statement ref: 18009.9.1_22.07.29_DAS, section: 4.0