

DELEGATED APPLICATION REPORT

Target Date: 06/07/2021

Application No: 210526/FUL

Address: 220 Elgar Road South, Reading

Proposal: Residential redevelopment comprising demolition of existing single storey building and erection of 16 dwellings together with associated works

Case officer: Claire Ringwood

SITE DESCRIPTION, SURROUNDING AREA AND BACKGROUND

The application site is rectangular in shape and is located on the western side of Elgar Road South and consists of a large single storey flat roof building with parking at the rear. There are residential properties to the north, south and west of the site. To the east of the site is Nimrod Way Industrial Estate. To the west is the River Kennet and Waterloo Meadows which is classified as a Local Green Space in Policy EN7 of the Reading Borough Local Plan. The Kennet and Holy Brook Meadows is allocated in Policy EN13 as a Major Landscape Feature. Half of the site is currently occupied by the Driving Standards Agency (DSA) and the other half was previously used as an office occupied by the Electrical Services Company who vacated in October 2019. Whilst in employment use, the site is not located within a designated Core Employment Area.

PROPOSAL

The proposal as originally submitted was for the demolition of the existing single storey building and the erection of a 3.5 storey building consisting of 18 apartments (8 x 1b2p, 3 x 2b3p, 6 x 2b4p, 1 x 3b5p) with associated landscaping and 12 car parking spaces.

Due to concerns raised by Officers the scheme was amended and now proposes 16 units (8 x 1b2p, 2 x 2b3p, 5 x 2b4p, 1 x 3b5p) with associated landscaping and 12 car parking spaces. The large flat roof section as previously proposed has been removed and the building is now 3 storeys.

SUMMARY OF DISCUSSIONS WITH APPLICANT/AGENT

The agent was advised in an email dated 15th September 2021 that there were concerns with the proposal namely: a) design and appearance - unsympathetic appearance and staggered design along with a large section of flat roof was considered an incongruous addition within the street and an overdevelopment of the site; b) impact on neighbouring properties in terms of outlook, visual dominance and overbearing; c) limited amenity space; and d) internal arrangements and stacking.

Amended plans were submitted on 1st October 2021 however there were still concerns in terms of design and appearance, impact on neighbouring properties, the removal of the only 3 bedroom flat and concerns from the Crime Prevention Design Advisor.

Subsequent amendments were submitted on the 19th November 2021 and these have been considered on the basis of this refusal.

PLANS CONSIDERED

The agent submitted the following plans and information, received on 7th April 2021:

Drawing No: 0001 Rev P1 - Block and Location Plan
Drawing No: 1000 Rev P1 - Existing Site Plan
Drawing No: 1001 Rev P1 - Existing Roof Plan
Drawing No: 1200 Rev P1 - Existing Elevations
Drawing No: 2000 Rev P1 - Proposed Site Plan
Drawing No: 2100 Rev P1 - Proposed GF Plan
Drawing No: 2101 Rev P1 - Proposed FF Plan
Drawing No: 2102 Rev P1 - Proposed SF Plan
Drawing No: 2103 Rev P1 - Proposed TF Plan
Drawing No: 2104 Rev P1 - Proposed Roof Plan
Drawing No: 2200 Rev P1 - Proposed Street View
Drawing No: 2201 Rev P1 - Proposed East-West Elevation
Drawing No: 2202 Rev P1 - Proposed North-South Elevation
Drawing No: 1831-GA-100 - Landscape General Arrangement
Drawing No: 1831-PP-300 - Planting Plan
Design & Access Statement
Planning Statement (inc. Statement of Community Involvement and Affordable Housing Statement) (March 2021)
Flood Risk Assessment
Contaminated Lane Risk Assessment - Phase 1 Desk Top Study - Preliminary Risk Assessment
Daylight & Sunlight Report
Biodiversity Report
Preliminary Ecological Appraisal
Consultation Leaflet
Sustainability Statement
Transport Statement

The agent submitted the following information, received on 9th July 2021:

Planning Statement (inc. Statement of Community Involvement and Affordable Housing Statement) (June 2021 Version 2)

The agent submitted the following plans, received on 19th November 2021:

Drawing No: 2000 Rev P5 - Proposed Site Plan
Drawing No: 2101 Rev P5 - Proposed FF Plan
Drawing No: 2102 Rev P4 - Proposed SF Plan
Drawing No: 2104 Rev P4 - Proposed Roof Plan
Drawing No: 2200 Rev P4 - Proposed Street View
Drawing No: 2201 Rev P5 - Proposed East-West Elevation
Drawing No: 2300 Rev P2 - Proposed Section and Cycle Store

The agent submitted the following plans, received on 23rd November 2021:

Drawing No: SK01 - Proposed GF Plan_Alternative
Drawing No: SK06 - Proposed North-South Elevation_Alternative

RELEVANT PLANNING HISTORY

201146/PREAPP - Pre-application advice for the proposed development of 22 apartments with associated landscaping and parking. Observations sent 28/10/2020.

Officers confirmed the principle of residential development was acceptable but raised concerns over the design and appearance of the scheme, the staggered frontage and height had no relationship with the existing heights of neighbouring properties on either side and it would be significantly higher than both, along with its flat roof design it was considered to be an incongruous addition within the street that was not considered to respect the scale of the surrounding properties. Concerns were also raised with regards to impact on neighbouring properties in terms of visual dominance, overbearing effects, harm to outlook, overlooking and loss of privacy. The scheme also failed to provide any usable amenity space and although it was acknowledged that Waterloo Meadows is located at the rear of the site and is a benefit to the site, it did not remove the need for on-site amenity space as required under policy H10 of the Reading Borough Local Plan. The agent as part of the pre-application enquiry sought specific guidance on what level of amenity space was now acceptable taking into consideration the current climate and was advised that in the first instance Policy H10 was applicable but the current pandemic has highlighted the critical role the urban environment has on the way we live and work and therefore much greater importance is being put on the provision of amenity space.

09/01870/FUL (Civica Ref: 091872) - Change of use from B1 offices to D1 Church Use. Refused 31/12/2009.

92/00871/GOV (Civica Ref: 920541) - Change of use from office (B1) to driving test centre (sui generis). Observations sent 06/01/1993.

89/01089/OUT (Civica Ref: 891394) - Construction of light industrial 'Hi-tech' unit plus onsite parking (renewal of planning permission 86TP802). Refused 23/11/1989.

CONSULTATION RESPONSES

The following addresses were consulted: Park View - 1-12 (all), 14-19 (all), Elgar Road South - 220 (all), 224-230 (e), Preston Road - 6A and Nimrod Way - Unit 1 Nimrod Industrial Estate. 5 letters of objection have been received raising the following concerns:

1. There are many social problems in the area including drugs, vandalism and crime and increasing the population in the area will decrease the quality of life further;
2. The area is heavily congested with 3 huge industrial estates that daily carry high amount of traffic;
3. Placing another residential development in the area is exposing current locals to more traffic, exposure to accidents, further lowering air quality and the project would further damage the upbringing of children in the area;
4. Overlooking private gardens and loss of privacy;
5. Loss of light;
6. Overdevelopment;
7. Noise and disturbance;

8. Lack of parking and the impact this will have on the existing roads where parking is already a problem;

Development Control Transport

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 and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

This application consists of the demolition of the existing building and the erection of a 3.5 storey building with 18 dwellings comprising of:

Ground Floor

- 2x 1b
- 2x 2b
- 1x 3b

First Floor

- 3x 1b
- 3x 2b

Second Floor

- 3x 1b
- 2x 2b

Third Floor:

- 2x 2b

In accordance with the adopted Parking SPD, the development would be required to provide the following parking and cycle provision.

Type of Dwelling	Zone 2 Parking requirements	Zone 2 Cycle Spaces Requirements
C3 Dwelling Flat 1-2 Bed (17)	1	0.5
C3 Dwelling Flat 3 Bed (1)	1.5	1.0
Visitor Parking (flats only)	1 space per 10 dwellings	0

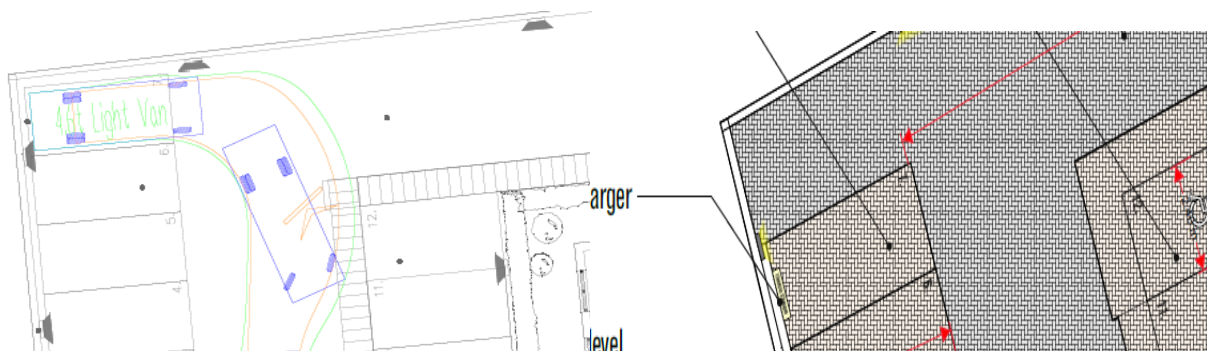
Parking

Parking restrictions are in place along Elgar Road in the form time restricted parking bays, single and double yellow lines and the operation of a Residents Parking Permit Scheme. Submitted plans and Design and Access Statement indicate a total of 12no. allocated spaces, of which one will be a disabled bay and 1 space will incorporate an EV charging point. In accordance with the current standards a total of 20 spaces (rounded up from 19.5) parking spaces are required, this includes 1 visitor parking

space. This falls short of the Council's current standards. Given that there are areas where on street parking is unrestricted the parking provision will need to comply with the Council's current standards, Transport would not support an increase of on street parking.

Recent changes to the Local Transport Plans state that provision for electric vehicle charging points within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point. This will need to be illustrated on plans.

Tracking has been provided, illustrating a delivery vehicle turning on site, however the turning area referred to is shown as a formal parking space in the tracking diagram included in the Transport Statement but as a clear space in the Site Plan. Clarification is required as the 2 plans contradict proposed layout. (Please see below extract from Transport Statement and Site Plan).



As stated part of Elgar Round South is located in an area designated as a Residents Parking Permit Area; Zone 10R. Under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area, therefore if this application is approved there should be an assumption that any future occupants of the proposed dwellings will not be issued with resident or visitor parking permits which should be covered by condition and an informative applied. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

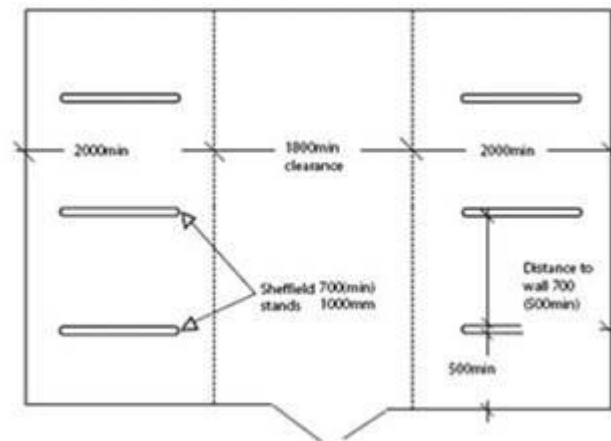
Access

The existing access is to be retained. The proposed site plan illustrates a bell mouth access with access into the site excess of 5m which is deemed acceptable for movement of two way traffic and out of the site.

Cycle Storage Provision

In accordance to the current Council's Standards 10 cycle parking standards (rounded up from 9.5) would be required for the development. The site plan states 10 spaces would be provided which would comply with the standards, however the size of the proposed storage unit would not facilitate 10 Sheffield type stands. Stands should be set back a minimum of 500mm from the wall as per the diagram below and there should be 1m between each bike.

Typical Cycle Layout



A Josta style storage unit can also be considered, which would require a height of 2.8m. Revised plans required.

Bin storage should be noted that these should not be located further than 15m from where the vehicle can wait to undertake collection. This is to avoid the stationing of service vehicles on the carriageway for excessive periods. Schedule 1, Part H of the Building Regulations 2000 defines locations for the storage and collection of waste. Key points in the approved document to part H include: Residents should not be required to carry waste more than 30m (excluding any vertical distance) to the storage point. Although tracking diagrams have been provided illustrating refuse vehicles reversing into the site, the site plan illustrates the location of the bin store in excess of 15m from the access. Revised plans are required illustrating repositioning of the bin storage.

In principal there are no Transport objections to this application as the number of trips generated by the proposed 18 dwellings would be significantly less than the existing use which is a DVLA driving test centre.

This application will be subject to a Construction Management Statement.

Natural Environment Trees

Previous Natural Environment comments raised concerns with the lack of proposed planting, lack of planting on the frontage, inappropriate species, the high share of hard landscape/built area of the site and various inconsistencies between plans. It was also pointed out that the site is located in a low canopy ward (Katesgrove ~10%), which make planting and soft landscaping more important when assessing this application.

With reference to the Planting Plan Drawing. No. 1831-PP-300 Rev A and the Proposed Site Plan Rev P4, the following are noted:

Some inconsistencies between the plans and the planting schedule are still outstanding - 7 trees shown on plans, but only 5 on the planting schedule; 1 *Prunus avium* 'Plena' shown on plans, but not on the planting schedule; the planting plan (albeit

acknowledged by the agent) does not show the updated location for cycle storage. These should be addressed before a decision.

Although the updated plans retain the same built/hardstanding footprint on site and same set back from the road, significant shrub planting along with additional tree planting is provisioned, which is positive. Still there are some missed opportunities, which should be considered given the low canopy area context, such as green walls or roofs - there appears to be no comment in relation to the omissions of these.

The trees along Elgar Road South should be of species which grow a medium to large sized crown, depending on the space available - the one in the (east) corner has the most available space, so an ultimately large crown species may be suitable. Also, we are currently discouraging the planting of *Prunus* as it is an over-represented genus in the Borough. Species details can be secured via condition if/when the application is otherwise supported, but the agent should be made aware of these suggestions.

I note that a significant amount of the 'soft' space at the rear is taken up by planting beds, around the 4 proposed trees, leaving limited grass space and a 'hard area', presumably with seating, as the amenity space. You may wish to consider whether there is therefore sufficient 'usable' amenity space or whether the planting beds should be reduced to allow more lawn area.

As in my previous memo, the maintenance specifications and schedule are only briefly noted on the Planting Plan, therefore these will be secured via condition too - if and when application is supported.

In conclusion, the landscaping has improved since last iteration, and can now be supported in landscape terms (in principle), however if the applicant wished to avoid pre-commencement conditions, further updates would be required. Otherwise approval subject to condition L2 would be appropriate. I will leave you to consider further whether the opportunity to include green walls/roofs should be pursued.

Crime Prevention Design Advisor

Initial comments

There are significant concerns relating to the design as follows;

- 1) There is no active surveillance present on the ground floor to oversee the entrance into the building. Active surveillance should be present from rooms where a guardian is most likely to be present to observe/deter anyone intent on crime and anti-social behaviour eg. lounge and kitchen areas. On this elevation there appears to be bin and cycle stores (both of which are often a draw for crime and ASB if not secured robustly) and a blank wall alongside a downstairs bedroom. No active surveillance appears to be present on subsequent floor either overseeing the access.
- 2) There is no secure lobby located on the ground floor. We would normally request a two door entry layout making it more difficult for someone to tailgate or gain entry to the private communal corridors. This would be particularly pertinent

due to the lack of surveillance highlighted above and would also provide a location for postal services.

- 3) From the plan the ground floor residential corridor is accessible to all residents and visitors regardless of any need to legitimately access it. This could undermine the sense of ownership felt by the residents with a high level of anonymity likely to be present in an area which should be private to the residents located on this floor. Providing access only to those that have a legitimate need would create a level of compartmentation within the building, helping to increase a real sense of ownership and community. Offenders should not always be considered to be external to a development and compartmentation can prevent ASB permeating through the building.
- 4) I cannot see where they are proposing to position postal services and so can only assume that they are intending for deliveries to be made through each dwelling door. This would require unrestricted access into the building which is usually facilitated via a trades button, both fundamentally undermine any physical security that is provided. Unrestricted access into the building for postal services should not be possible, providing a legitimate excuse for someone intent on criminal activities. Unfortunately, the change in consumer habits now results in a steady stream of courier deliveries (amazon etc) and no longer just first and second class Royal Mail deliveries. Any proposal to allow through the door deliveries significantly increases the level of anonymity within private residential corridors. Postal services should either be provided with secure external letter boxes or located within a secure lobby area.
- 5) There should be access controls present for residents as well as visitor entry systems providing audio and visual identification and door release from individual units. No trades buttons should be present.

Updated comments following amended plans

Unfortunately both additional windows are from bedrooms and not active rooms in the dwelling therefore I would not consider this to be sufficient. By active we refer to rooms which are most likely to be occupied and therefore able to observe and deter an offender. Bedrooms generally have curtains and blinds closed when occupied preventing surveillance out. The need for active surveillance is even more pertinent due to the lack of a secure lobby which potentially exposes the lift and stairwells to unauthorised access if the entrance door is breached and the location of the bin store which often attract anti-social behaviour which is on the same elevation. Unfortunately I think this is something that would have to be addressed through a change in the floor plans as well as the introduction of additional windows.

I also mentioned compartmentation previously which I would be keen to see but this doesn't seem to have been addressed. Whilst this could be achieved by access controlling the doors on each floor plate from the stair core unfortunately the lift is located separately therefore any one entering the development could access the lift and exit it on any floor undermining these access controls. I appreciate they have said they will provide access controls through a camera and intercom but that really relates to visitor entry and not access controls for residents. I think more detail is required

and again potentially some floor plan changes with additional access controlled doors could address it.

Their proposal to mount postal services adjacent to the communal door is again an issue of surveillance, external letter boxes should have a high level of surveillance available to them which unfortunately brings me back to my first point.

Environmental Protection

Environmental Protection concerns

- Noise transmission between dwellings
- Contaminated Land
- Construction and Demolition phase
- Bin storage - rats

Noise between residential properties - sound insulation of any building

Informative

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

Contaminated Land

Where development is proposed, the developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.

The Phase I risk assessment submitted with the application confirms that further assessment is necessary.

Recommended conditions below are required to ensure that future occupants are not put at undue risk from contamination.

- *CONTAMINATED LAND ASSESSMENT (TO BE SUBMITTED)*
- *REMEDATION SCHEME (TO BE SUBMITTED)*
- *REMEDATION SCHEME (IMPLEMENT AND VERIFICATION)*
- *UNIDENTIFIED CONTAMINATION*

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.

Recommended conditions

- *CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)*
- *HOURS OF CONSTRUCTION/DEMOLITION*
- *NO BONFIRES*

Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. I recommend the following condition.

- *DETAILS OF BIN STORES (TO BE SUBMITTED)*

Sustainability

Concerns were raised that a fabric first approach was not being followed, solar panels were being used to just bring the scheme into compliance and gas boilers were being proposed which locks in fossil fuel consumption. The applicant should be encouraged to achieve better fabric standards, particularly on walls and sloping ceilings.

Parks & Leisure

There are no objections to this proposal subject to the following conditions: We request a contribution of £1,800 per unit <75m² / £2,000 per unit >75m² to be allocated towards the nearby Waterloo Meadows. The dwellings are a mixture of 1, 2 and 3 bedrooms which indicates families will reside here. The proposal has no effective recreational green space included within it. The amenity/green space provided is insufficient and of limited value which will result in people travelling across to Waterloo Meadows for recreational activity, which is why we are requesting an off-site contribution. We note there has been previous comments regarding the level of daylight / sunlight and trust yourself / planning to be satisfied this has been covered.

Ecology

The application site comprises a plot of land containing a detached building. This single storey building has a flat roof and is surrounded by hardstanding and lawn. It is proposed to demolish this building and erect eighteen new dwellings on the site.

A Preliminary Ecological Appraisal report (Windrush Ecology Limited, September 2020) has been undertaken to an appropriate standard and is discussed below.

Habitats

The site comprises a detached building, amenity grassland, and hardstanding, surrounded by timber panel fences and brick walls. The habitats on site are not

“Priority Habitat” (as defined by the NPPF) and the report concludes that the habitats are of ‘negligible ecological value’.

Bats

The building on site is considered to be unsuitable for bats and that there is no evidence to indicate that the building is being used as a place of shelter/protection by roosting bats.

Other wildlife

The proposals will not affect other protected or priority species.

However, in accordance with paragraph 175 of the NPPF, which states that “opportunities to incorporate biodiversity in and around developments should be encouraged” a condition should be set to ensure that enhancements for wildlife are provided within the new development. It is recommended that new areas of landscape or native planting associated with the proposals are designed, planted and managed to maximise their value to wildlife.

Summary

The proposals are unlikely to affect protected species or priority habitats and further surveys will not be required. As such, subject to the condition below, there are no objections to this application on ecological grounds.

Condition: Prior to the occupation of the development, details of biodiversity enhancements, to include at least 8 integral bird and bat boxes, tiles or bricks on the buildings and native and wildlife friendly landscaping (including gaps at the bases of fences to allow hedgehogs to traverse through the gardens), shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 175 of the NPPF.

Canal and Rivers Trust

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended) is that the Trust has **no comment** to make on the proposal.

Thames Water

Waste Comments

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development does not materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you are planning significant works near our mains (within 3m) we will need to check that your development does not reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

If you are planning on using mains water for construction purposes, it is important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

EQUALITY ACT 2010

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

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) - among them the '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 (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

EN7: Local Green Space and Public Open Space

EN9: Provision of Open Space

EN10: Access to Open Space

EN12: Biodiversity and the Green Network

EN13: Major Landscape Features and Areas of Outstanding Natural Beauty

EN14: Trees, Hedges and Woodland
EN16: Pollution and Water Resources
EM3: Loss of Employment Land
H1: Provision of Housing
H2: Density and Mix
H3: Affordable Housing
H5: Standards for New Housing
H10: Private and Communal Outdoor Space
TR1 (Achieving the Transport Strategy)
TR3: Access, Traffic and Highway-Related Matters
TR5: Car and Cycle Parking and Electric Vehicle Charging

Supplementary Planning Guidance/Documents:

SPG: Planning Obligations under s.106 (2015)
SPD: Sustainable Design and Construction (2019)
SPD: Revised Parking Standards and Design SPD (2011)
SPD: Affordable Housing (2021)
SPD: Employment, Skills and Training (2013)

Tree Strategy for Reading (March 2021)

APPRAISAL

Main considerations:

- a) Principle of development
- b) Housing mix
- c) Design and appearance
- d) Residential amenity
- e) Transport implications
- f) Natural Environment
- g) Sustainability
- h) Flooding and Sustainable Drainage Systems
- i) Other Matters - Affordable Housing, Open Space Contribution, Employment, Skills and Training, CIL

a) Principle of development

Policy EM3 seeks to ensure the overall level of employment land is maintained. Although 220 Elgar Road South 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 and the existing use is at odds with the predominantly residential character of this side of Elgar Road South. There is a Core Employment Area opposite (policy EM2f: Elgar Road) and Policy SR3: South of Elgar Road Major Opportunity Area states that this site will be for 330-500 residential dwellings. Although this site is south of 220 Elgar Road South this section of Elgar Road South is predominantly residential. The proposal is also in line with Policy H1 (Provision of Housing) as it will contribute to the housing need in Reading and will provide family housing as required in Policy H2 (Density and Mix) where paragraph 4.4.9 states *“homes with two or more bedrooms, capable of accommodating families, represent the majority of the need”*.

The submitted Planning Statement advises the Driving Standards Agency who occupies part of the existing building are actively seeking to relocate and the office part of the building has been vacant for a period in excess of 12 months despite ongoing marketing. Officers therefore consider the principle of residential development is acceptable subject to meeting the relevant planning policies and other material considerations as detailed below.

b) 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. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be 3 or more bedrooms or more, having regard to all other material considerations.

The scheme comprises 16 flats:

8 x 1b2p
2 x 2b3p
5 x 2b4p
1 x 3b5p

The proposed mix fails to comply with Policy H2 however, although this policy is focused on achieving a minimum of 50% of 3 bedroom flats paragraph 4.4.9 makes it clear that *‘when taken as a whole however, homes with two or more bedrooms, capable of accommodating families, represent the majority of the need, and this Plan identifies this provision as a priority’*.

The proposed mix includes for 50% to be two bedroom or more and is therefore acceptable in this instance.

c) **Design and appearance**

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 130 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)”*.

The existing single storey flat roof building occupies a large area of the site and is not considered to make a positive contribution to the appearance of the area which to the east side of Elgar Road South is predominantly residential in nature. The properties to the south of the site are traditional two storey semi-detached properties whilst properties directly to the north are more modern three storey flats with a pair of semi-detached properties directly behind the site.

The proposed development (as amended) introduces a storey 3 building in a modern design with a staggered frontage. There are four sections to the building. There are three, three storey gables which are all the same height and have pitched roofs. Each three storey gable is the same width although they reduce in depth as they move towards 224 Elgar Road South. There is also a two storey addition with a steep mono pitched roof to the side adjacent to the semi-detached property at 224 Elgar Road South and a first and second floor floating addition with a flat roof to the side of the building adjacent to the existing flats to the north. There are levels at the site with the front being at a higher level than the rear. The proposed development reduces the level of the site at the front.

It is clear that consideration has been given to the relationship with the neighbouring properties and the scheme has been designed around existing constraints of the site such as differing heights of properties on either side of the site which has meant the height of the eaves closest to neighbouring properties has been reduced and the staggered design reflects the existing building line along Elgar Road South. The removal of the flat roof from the original scheme is positive. The existing flats to the north are located close to the footpath whilst the semi-detached properties to the south have regular front gardens and driveways. The existing single storey building is in line with these semi-detached properties.

The Council is not adverse to modern designs, and providing interest to the street scene is encouraged however, the Council has maintained its concern with the staggered design of the proposal throughout the duration of the application and the concern that the proposal is an overdevelopment of the site. Officers consider that by trying to address the existing constraints of the site (differing heights of neighbouring properties and existing building lines) this has created an unsympathetic appearance and an incongruous addition within the street.

The overall footprint of the proposed development has remained the same and its excessive scale, height and massing is considered overly-dominant in the streetscene of this part of Elgar Road South and it would be particularly out of scale with and overbearing to the pair of semi-detached houses at 224/226 Elgar

Road South. The flank walls of the blocks would be long, tall and given the gaps in the streetscene would be very noticeable and harmful, particularly given the protruding elements which are not harmonious with the main block. In addition, the design fails to provide a sufficient landscaped setting for the large building.

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

For the above reasons, the proposal is considered to be an overdevelopment and a poor design response which fails to respect the prevailing urban grain and would be harmful to the streetscene of Elgar Road South and the abrupt step-change in height/scale to 224/226 Elgar Road would be harmful to Waterloo Meadows through intensive adjacent development, contrary to policies CC7 (Design and the Public Realm) and EN7 (Local Green Space and Public Open Space) of the Reading Borough Local Plan (2019).

d) **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 neighbour amenity

The proposed development is not considered harmful to the neighbouring properties. The submitted Site Plan shows the proposal does not encroach on a line taken at 45 degrees from the middle of the closest habitable windows of 224 Elgar Road South and the flats to the north to ensure adequate light remains. A Daylight & Sunlight Report has been submitted with the application which states the 3 side windows to the block of flats to the north (and closest to the proposed development) serve bathrooms and are not considered as habitable rooms. The remaining south facing windows set back further from the site are understood to serve bedrooms, living rooms and circulation space. 224 Elgar Road South has two side facing windows at ground and first floor level which are to non-habitable rooms and a doorway. As non-habitable rooms, these would not be relevant for daylight/sunlight assessment under the BRE guidelines. There are no side facing windows to 14 Park View at the rear and the report did not consider this property for daylight and sunlight effects. 16 Park View was also included in the report.

The report concludes that “development of a low-rise site will inevitably lead to some degree of change in the prevailing daylight and sunlight levels however the scheme responds positively to the closest neighbours.....the results of our technical assessments show that the majority of the neighbours meet the BRE guidelines and whilst there are isolated deviations to 224 Elgar Road South, these are limited to minor changes in the VSC. Given these spaces are served by additional windows which will be unaffected by the proposal, daylight amenity will remain high.....the assessment of sunlight to neighbouring windows has also shown full compliance with the BRE criteria”.

The only side windows are to the north elevation where there are windows on the ground floor to Flat 1, there is a window to the main corridor on the first and second floors and an oriel window to a bedroom on the first and second floors which is angled so it faces the front of the site. All other windows are front and rear facing.

There is a side to side distance of approximately 7.5m between the flats to the north and the proposed development and 5m side to side with 224 Elgar Road South and the proposal is also significantly lower adjacent to this neighbouring property. There is approximately 23.5m between the rear of the proposed development and the side elevation of 14 Park View directly to the rear which is considered sufficient to avoid any loss of privacy or overlooking. Policy CC8 states a back to back distance of 20m is usually appropriate.

Residents of neighbouring properties will notice the proposed development however they are considered a sufficient distance away and as the majority of the windows face the front and the rear this ensures there is no loss of privacy or overlooking.

Concerns have been raised with regards to additional noise and disturbance although it is not clear whether this relates to demolition and construction or from future occupiers of the proposed development. Had the application been acceptable in all other regards, conditions would have been imposed which restricted the hours of demolition and construction along with a Construction Method Statement, these conditions would have been required to protect

residents of neighbouring properties from unreasonable disturbance. In terms of noise and disturbance from future occupiers of the proposed development, the site is within a predominantly residential area and introducing another residential use into the area is not considered detrimental to the living conditions of neighbouring properties.

Concerns have also been raised with regards to increasing social problems within the area and reducing the quality of life further for existing residents. Officer concerns over the design elements of the proposal in terms of crime and safety are addressed below and Policy CC8 takes crime and safety into consideration. Officers, through planning policies aim to achieve developments that are high design quality (Policy CC7) which do not detrimentally impact existing residents but which enhance the character of an area and which provides an acceptable living environment for both existing and proposed residents. By introducing a new residential development that meets the relevant planning policies and other material considerations would not be expected to reduce the quality of life for existing residents.

Overall the proposed development is not considered to have a detrimental impact on the living environment of existing residential properties and is in accordance with Policy CC8 of the Reading Borough Local Plan.

Amenity of proposed dwelling

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.

A schedule of room sizes has been provided and the proposed flats meet or exceed the nationally-prescribed space standards. The internal layouts are acceptable with adequate sized bedrooms (which meet the size requirements in Policy H5) and living accommodation. The proposed development therefore, provides an acceptable standard of accommodation and is in accordance with Policy H5 of the Reading Borough Local Plan.

Sunlight/daylight

The proposed flats to the front have east facing windows and the proposed flats to the rear have west facing windows. A Daylight & Sunlight Report has been submitted which concludes that the assessment of daylight within the proposed flats has shown that all of the rooms assessed between the ground and first floor levels satisfy the BRE recommendations for internal daylight and the internal sunlight assessments demonstrate that all of the main living spaces will be in exceed of the BRE targets for Annual Probable Sunlight Hours. The report also states that “daylight and sunlight amenity will only improve to the upper floors as outlook to the units increase”.

Outdoor space

Policy H10 sets out that *“Dwellings will be provided with functional private or communal open 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.”*

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: (b) Flats outside central Reading: 1 and 2 bedroom: 25sqm per flat; 3 or more bedrooms: 40sqm per flat. The proposal would therefore be required to provide 415sqm of communal open space.

Through the course of the application there have been concerns with regards to the amenity space being provided due to the overall size of the proposal and the level of hardstanding for parking on the site. The agent has maintained that the proposed amenity space meets the requirements of Policy H10 and the sites proximity to Waterloo Meadows and stated that *“Paragraph 4.2.40 of Policy EN9 states Policy H10 seeks to secure private and communal outdoor amenity areas on all residential developments, the extent of which will be guided by the site’s proximity to quality public open space”*.

Due to the overall footprint of the proposed scheme there is little meaningful amenity space proposed for future occupiers. The ground floor flats have been allocated separate, enclosed spaces to the front of each flat which leaves a small area in the south west corner (where the bike store is now also proposed) for the remaining 11 flats which would need to be accessed from the car park. As the agent asked a specific question during the pre-application enquiry with regards to the level of importance being placed on outdoor amenity space due to the current pandemic, particularly as more people are now working from home, it is disappointing that inadequate. Officers advised in their pre-application response that Waterloo Meadows at the rear of the site is a benefit to the site, but it does not remove the need for on-site amenity space as required under Policy H10 of the Reading Borough Local Plan.

Policy EN9 states *“on sites of less than 50 dwellings, or in areas not identified as deficient in the provision of open space, new open space provision, improvements or enhancements will be sought, including through appropriate contributions”*. The Council’s Parks & Leisure section have requested a financial contribution and this is discussed further in the report.

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

Crime and safety

The development proposes a layout with flats to the front and rear of the site accessed by a side entrance door leading to a long corridor and stairwell. This is a poor and insecure choice of layout with no legible front door/entrance feature and instead the communal door is approached along a secluded side vehicle access. The entrance door would be a narrow and unwelcoming entrance with no overlooking from habitable windows in the development and dwarfed in scale and importance by the adjacent bin store doors.

Initial comments from the Crime Prevention Design Advisor raised significant concerns with the proposed development as detailed above, namely no active surveillance; no secure lobby; the ground floor corridor is accessible to all residents and visitors regardless of any need to legitimately access it; position of postal services not shown; potential unrestricted access; and access controls should be present for residents as well as visitor entry systems providing audio and visual identification and door release from individual units.

Amended plans were submitted and the agent stated in an email dated 1st October 2021 that “the revised scheme includes an amendment to the orientation of windows at first and second floor level to ensure there is improved surveillance of the access. It is also worth noting that the principal elevation is set back from Elgar Road South at the point of access so there is already a sense of surveillance from the units here. A camera/intercom system will control access to the building as suggested and post boxes can be provided externally on the northern elevation of the building adjacent to the entrance”.

The amendments were reviewed by the Crime Prevention Design Advisor who advised the amendments were not satisfactory and there were still concerns which would need to be addressed through a change in floor plans as well as the introduction of additional windows.

As such, the above design flaws would therefore fail to create a safe and accessible environment, where crime and disorder or fear of crime can undermine quality of life or community cohesion for future residents, contrary to Policy CS7 (Design and the Public Realm) and CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019).

e) Transport implications

The Council’s Transport section advised on the original scheme of 18 flats that the 12 allocated car parking spaces (including one disabled bay and one incorporating an EV charging point) did not comply with the Council’s current standards where 20 car parking spaces were required. The Council’s Transport section advised that the reduction in the number of proposed flats following an assessment of car ownership data identified that 14 spaces would be required. Transport officers also confirmed they would be happy for visitor parking to be undertaken on street given the bays currently provided on street to the site frontage. As one visitor space is provided on site this could, by way of amended

plans, allow the site to provide 13 parking spaces. As this would only be one space less than required it is not considered significant enough to warrant refusal on these grounds.

Had the application been acceptable a condition would have also been imposed as there should be an assumption that any future occupants of the proposed dwellings would not be issued with resident or visitor parking permits in local areas designated as a Residents Parking Permit Area which will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

Four EV charging points are now proposed which is acceptable and meets the requirement of 10% of spaces providing an active charging point.

There are inconsistencies between the proposed Site Plan and the tracking diagrams submitted in the Transport Statement. The Site Plan shows a clear space whilst the tracking diagram showed a parking space. The agent advised in an email dated 1st October 2021 that if the amended scheme was acceptable then an updated Transport Statement would be provided to address this matter.

Bin storage should not be located further than 15m from where a refuse vehicle can wait to undertake collection to avoid stationing of service vehicles on the carriageway for excessive periods. When measured from the middle of the bin store (located within the building and accessed from along the driveway) there is a distance of approximately 17.5m to the entrance of the site. Tracking diagrams have illustrated refuse vehicles reversing into the site and Officers consider that this is acceptable.

Originally the cycle storage was located within the building and accessed from the driveway with 10 spaces allocated. The Council's Transport section advised that the number of cycle stands proposed complied with the Council's standards however the size of the storage unit proposed would not facilitate 10 Sheffield type stands. Amended plans were submitted which relocated the cycle store to the south west corner of the site and provided 10 Sheffield type stands however stands should be set back a minimum of 500mm from the wall and there should be 1m between each bike. The proposed cycle store shows a distance of 750mm between each stand.

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

f) Natural Environment

Landscaping

The site is within a low canopy ward which makes planting and soft landscaping more important. Natural Environment officers previously raised concerns with the lack of proposed planting, lack of planting on the frontage, inappropriate species, the high share of hard landscape/built area of the site and various inconsistencies between plans.

The amended plans retain the same built/hardstanding footprint and the same set back from the road however significant shrub planting along with additional tree planting is envisioned, but there are missed opportunities which should be considered given the low canopy area context such as green walls or roofs and the relocation of the cycle store has further reduced the landscaped area. Although the proposed landscaping has improved some matters have not been addressed and further improvements could be provided i.e. inappropriate species, introduction of green walls or roofs and inconsistencies between plans. Overall, the landscaping opportunities are considered to be too overly-compromised by the scale, footprint and massing of the development.

With regards to Ecology the proposals are unlikely to affect protected species or priority habitats however, in accordance with paragraph 180 d) of the NPPF (2021) “opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”. This matter could have been dealt with by way of a condition had the application been acceptable in all other regards.

g) Sustainability

Policy H5 (Housing Standards) requires that all new build housing integrate additional measures for sustainability. In light of this, and had the application been acceptable in all other regards, condition would be recommended to ensure the development meets the following requirements:

- Higher water efficiency standards under Regulation 36(3) of the Building Regulations; and
- All major new build residential development should be designed to achieve zero carbon homes;

Although part of a planning condition, these requirements would normally be administered through Building Regulations.

The accompanying Sustainability Statement concludes that *‘a Zero Carbon specification has not been sought on the development and the easiest route to facilitate a Zero Carbon development is to have a Biomass community heating supply all flats. This is not possible to facilitate with the current development proposal. This is due to the lack of substantial plantroom space required to site the biomass boilers and associate fuels. Therefore, a DER/TER improvement of 35% with a Section 106 offset contribution has been sought.’*

The conclusion in the Sustainability Statement continues ‘*the proposed development achieves a 35% improvement in the DER/TER as a site (block) average. We consider the proposed specification, detailed in Appendix 1, to be sufficient evidence that the development has incorporated a comprehensive set of energy efficiency and renewable energy measures in order to meet the required DER/TER improvement. This will be supplemented by a Section 106 contribution which has been broken down below:*’

Section 106 Contribution Calculation (as shown in the Sustainability Statement)

Site Average TER as defined in the Building Regulations 2013 (fuel factor = 1.00)	17.21 kgCO ₂ /m ² /yr
Site Average TER Improvement achieved on-site (35.91%)	6.181 kgCO ₂ /m ² /yr
Site Average TER to be offset through S106 contribution (64.09%)	11.029 kgCO ₂ /m ² /yr
64.09% of TER x total square meters (1,216.71m ²) = total excess CO ₂ emissions annually	13,419.09 kgCO ₂ /m ² /yr = 13.419 tonnes CO ₂ /yr
Annual excess CO ₂ emissions x £1800 = S106 contribution	£24,154.20

The Council’s Sustainability Officer raised concerns with the measures proposed however the agent stated in an email dated 1st October 2021 that were the Council minded to support the application then an alternative approach prioritising a fabric first method could be looked at.

h) Flooding and Sustainable Drainage Systems

Flooding

A Flood Risk Assessment has been submitted with the application which confirms the site is located in a low-risk Flood Zone 1 (and not Flood Zone 2 as identified in the pre-application response). The assessment concludes that the proposed levels will be dictated by boundary and engineering constraints as opposed to a predicted fluvial or tidal flood level. As such, with regards to groundwater flooding there is a medium risk where mitigation will include finished floor levels to be no less than existing ground levels at corresponding location, and surface water/overland flow is low risk and natural flow paths considered in development design. In terms of flood risk that application is acceptable.

Sustainable Drainage Systems

Policy EN18 requires all major developments to incorporate Sustainable Urban Drainage Systems (SUDS) with runoff rates aiming to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. An Assessment for an infiltration sustainable drainage system has been submitted as part of the Flood Risk Assessment. Comments received from the Council's Transport officer advised that the proposal had not been fully assessed as it should have been assessed against the existing brownfield run-off and more information would have been required. As the application was not considered acceptable in other regards this matter was not progressed further, however, there is not clear evidence that there is a concern and ultimately, this has not been considered a robust reason for refusal of the application.

i) Other Matters

Affordable Housing

The Council's adopted Policy H3: Affordable Housing states "on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing". The default requirement is therefore for on-site affordable housing to be provided.

The submitted Planning Statement states the 'proposal will provide compliant affordable housing' however no details were ever provided to explain this and as the application is not acceptable in other regards this matter was not pursued.

Therefore the proposal fails to contribute adequately to the housing needs of Reading Borough, contrary to Policy H3 (Affordable Housing), CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the Council's SPDs, 'Adopted Affordable Housing Supplementary Planning Document' (2021) and 'Planning Obligations under Section 106' (2015).

Open Space Contribution

The concerns of the Parks Dept. are noted. Whilst the on-site amenity is indeed poor, on balance, this issue is not considered so harmful as to result in a reason for refusal of the scheme.

Employment Skills and Training

The Employment, Skills and Training SPD sets out the obligations which will be sought from developers at the construction and end user phases of development, to contribute towards a range of employment, skills and training measures to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.

As the proposed development is a major scheme (10 or more residential units), there needs to be a commitment to working with the Council to either develop a

site-specific Employment and Skills Plan (ESP) or provide a financial contribution. The submitted Planning Statement recognises this requirement and had the application been acceptable in all other regards then a S106 agreement would have been required to secure this.

Community Infrastructure Levy

The proposal would have been subject to Community Infrastructure Levy (CIL). CIL does not form part of the determination of the application.

CONCLUSION

The proposal has been assessed and found to be unacceptable as it does not comply with the identified policies and guidelines.

RECOMMENDATION

REFUSE for the following reasons:

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

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

3. The layout with the internal entrance corridor results in the ground floor flats facing the streets being provided with patios and amenity spaces fronting the street. This is not a characteristic of the area and would become a poor design solution, as these areas will be inhabited, personalised and defended at ground floor level as private gardens. Further, there may be pressure for residents to seek high secure fencing and with the stepped building line and patios to the front will produce a cluttered

streetscene. The cluster of Juliet balconies proposed on the front elevation will add to this cluttered appearance. These aspects of the design would fail to respond positively to the local context and character and therefore would be harmful to the streetscene, the amenities of the area and provide unacceptable living conditions for the occupiers of the development, contrary to policies CC7 (Design and the Public Realm), CC8 (Safeguarding Amenity) of the Reading Borough Local Plan (2019) and H10 (Private and Communal Outdoor Space) of the Reading Borough Local Plan (2019).

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

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

6. In the absence of sufficient information being submitted at application stage and in the absence of a completed legal agreement to secure a resultant acceptable obligation or contribution towards the provision of affordable housing, the proposal fails to contribute adequately to the housing needs of Reading Borough, contrary to Policy H3 (Affordable Housing), CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the Council's SPDs, 'Adopted Affordable Housing Supplementary Planning Document' (2021) and 'Planning Obligations under Section 106' (2015).

7. Due to the failure to secure a suitable obligation or contribution (as appropriate) in terms of carbon-offsetting or a construction phase Employment and Skills Plan (ESP), the development will not provide suitable mitigation of its impacts on energy use/climate change or the impact on the local labour market, contrary to policies H5 (Standards for New Housing) and CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019) and the Council's adopted SPDs, 'Employment, Skills and Training' (2011), 'Sustainable Design and Construction' (2019) and 'Planning Obligations under Section 106' (2015).

INFORMATIVES

1. The refusal relates only to the following plans and drawings as received by the local planning authority:

Drawing No: 0001 Rev P1 - Block and Location Plan
Received on 7th April 2021

Drawing No: 2000 Rev P5 - Proposed Site Plan
Drawing No: 2101 Rev P5 - Proposed FF Plan
Drawing No: 2102 Rev P4 - Proposed SF Plan
Drawing No: 2104 Rev P4 - Proposed Roof Plan
Drawing No: 2200 Rev P4 - Proposed Street View
Drawing No: 2201 Rev P5 - Proposed East-West Elevation
Drawing No: 2300 Rev P2 - Proposed Section and Cycle Store
Received on 19th November 2021

Drawing No: SK01 - Proposed GF Plan_Alternative
Drawing No: SK06 - Proposed North-South Elevation_Alternative
Received on 23rd November 2021

2. Reasons for refusal 6 and 7 could be overcome by the submission of a satisfactory s106 legal agreement or unilateral undertaking.
3. The Local Planning Authority has been positive and proactive in dealing with this planning application by advising of issues with the proposal and advising of a withdrawal. This advice has not been followed, which has led to this refusal notice. The applicant is advised to use the Council's pre-application advice service before submitting any further planning application(s). An important aspect of any pre-application advice would be the commissioning of an independent design review of the proposals.