

220 - 222 Elgar Rd South, Reading RG2 0BW, United Kingdom

Planning Statement (inc. Statement of Community Involvement and Affordable Housing Statement)

On behalf of Maxika Homes

June 2021 (Version 2)



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1. Introduction

- 1.1 Nova Planning has been instructed by Maxika Homes (the Applicant) to prepare and submit a planning application for

Proposed residential redevelopment comprising demolition of existing single storey building and erection of 18no. dwellings together with associated works

- 1.2 This Planning Statement should be read together with associated plans and technical/environmental documents as follows:

Drawings

- Site Location (1:1250) and Block Plan (1:500) Ref. A4080 P1
- Proposed Site Plan (1:500) Ref. A4080 2000 P1
- Proposed Street View (1:100) Ref. A4080 2200 P1
- Proposed East and West Elevations (1:100) Ref. A4080 2201 P1
- Proposed North and South Elevations (1:100) Ref. A4080 2202 P1
- Proposed Ground Floor Plan (1:100) Ref. A4080 2100 P1
- Proposed First Floor Plan (1:100) Ref. A4080 2101 P1
- Proposed Second Floor Plan (1:100) Ref. A4080 2102 P1
- Proposed Third Floor Plan (1:100) Ref. A4080 2103 P1
- Proposed Roof Plan (1:100) Ref. A4080 2104 P1
- Landscape General Arrangement Plan (1:100) Ref. 1831-GA-100
- Planting Plan (1:100) Ref. 1831-PP-300

Reports

- Design and Access Statement – Sawkings Harper Architects
- Transport Statement – Nick Culhane Highways Consultant
- Flood Risk Assessment and Drainage Strategy – Mayer Brown
- Daylight/Sunlight Assessment – eb7
- Preliminary Ecological Assessment– Windrush Ecology
- Land Contamination Risk Assessment – Soil Environment Services Limited
- Energy Statement – Beat Solutions

2. Site Description

- 2.1 The site measures approximately 0.14Ha and is located on the Western side of Elgar Road South, approximately 1km south of Reading town centre. The wider context comprises a mixture of residential and commercial land uses on both sides of Elgar Road, extending to the Waterloo Meadows to the West which provides an unbuilt buffer to the River Kennet. The immediate context and character on the western side of Elgar Road is residential, with existing residential properties to the north, south and west.
- 2.2 It is understood that the existing building was constructed on site in the 1950's. It is single storey brick construction with a flat roof and raised parapet. Part of the building is currently used as a driving test centre with the remaining office accommodation lying vacant for a period of 12-months.
- 2.3 The building is set back from Elgar Road South, behind a low level boundary wall. The frontage is landscaped but poorly maintained and does not make any meaningful contribution to the appearance of the site. The rear of the site is dominated by hardstanding which provided parking for the uses contained within the building.
- 2.4 The site is adjoined to the north by residential flats over 3 storeys with steep pitched roof. This building is sited immediately adjacent to the highway with no landscaping and limited relief from the footway. The building is dual aspect to the east and west with a flank gable addressing the application site. To the south, the site is adjoined by semi-detached dwellings over two storeys with steep pitched roofs. These dwellings are set back from the highway with frontages comprising car parking and limited landscaping. The dwellings are also principally dual aspect to the east and west with hipped side elevation addressing the application site. The site is adjoined to the west by semi-detached dwellings over two storeys. These dwellings are dual aspect north and south, with flank gable addressing the application site.

3. Planning History

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

3.2 The site was the subject of a pre-application enquiry was submitted to RBC in August 2020. The enquiry sought Officer advice on a proposal of 22no. dwellings. In summary, the response confirmed that the principle of residential redevelopment is acceptable but raised concerns over the design and appearance of the scheme as follows. The response also highlighted technical and environmental requirements for any subsequent planning application which are dealt with by the accompanying reports.

- Height, design and appearance

The scheme as submitted is not considered sympathetic to the neighbouring properties in terms of its height or design. The staggered frontage and height has no relationship with the existing heights of the neighbouring properties on either side and it would be significantly higher than both neighbouring properties.

Its flat roof design it is considered to be an incongruous addition within the street that is not considered to respect the scale of the surrounding properties.

Any future scheme would need to respect building lines of the existing residential developments along this part of Elgar Road South and the levels should create a gradual transition from the two storey semi-detached dwellings to the south towards the three storey block of flats to the north.

- Impact on neighbouring properties

Overall size of the proposal will be visually dominant and overbearing on neighbouring properties and due to its height, massing and scale would be harmful to their outlook with potentially some loss of light/overshadowing to the flats to the north.

Loss of privacy and overlooking from the rear facing windows.

- Lack of landscaping and amenity space

Minimum provisions for private or communal outdoor space

Any future planning application would need to demonstrate that the proposed flats have access to a suitable level of daylight and sunlight.

4. Planning Policy Framework

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

i. National Planning Policy Framework

- 4.2 The current National Planning Policy Framework (NPPF) replaces both the first NPPF published in March 2012 and second NPPF, published in July 2018 and sets out the Government's agenda for planning and growth in England.
- 4.3 Paragraph 4 outlines the central objectives of the Framework, which includes a 'social objective' to support the health and well-being of communities.
- 4.4 Paragraph 7 sets out the purpose of the planning system as being the contribution to achieving sustainable development. The objective of sustainable development is to meet the needs of the present, without compromising the ability of future generations to meet their needs. In achieving sustainable development, there are three, interdependent objectives: an economic objective; a social objective; and an environmental objective. Whilst these objectives should be used to guide development towards sustainable solutions, local circumstances should be considered to reflect the character, need and opportunities of each area.
- 4.5 At the core of the NPPF is the presumption in favour of sustainable development, where it is advised that plans and decisions should apply a presumption in favour of sustainable development (para.11). For decision-taking, this means that development proposals should be approved without delay if they are in accordance with an up to date development plan. Where there are no relevant development plan policies, or they are out of date, permission should be granted unless:
- 4.6 Section 4 of the NPPF advises authorities to approach decisions on applications in a positive and creative way and that applications for sustainable development should be approved where possible. Paragraph 39 encourages early engagement to improve the efficiency of the planning application process. This allows many issues to be resolved at pre-application stage, including improvement to infrastructure and affordable housing.
- 4.7 The revised NPPF continues to reinforce the Government's emphasis on significantly boosting the supply of housing and is intended to prompt significant change in the delivery of housing to rectify the housing crisis. The emphasis on the delivery of housing in sustainable locations also remains.

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

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

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

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

ii. Reading Borough Local Plan

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

- CC1 Principle in Favour of Suitable Development Policy
- CC2 (Sustainable Design and Construction)
- CC3 (Adaptation to Climate Change)
- CC5 (Waste Minimisation and Storage)
- CC6 (Accessibility and the Intensity of Development)
- CC7 (Design and the Public Realm)
- CC8 (Safeguarding Amenity)
- EN9 (Provision of Open Space)
- EN12 (Biodiversity and the Green Networks)
- EN16 (Pollution and Water Resources)
- EM3 (Loss of Employment Land)
- H1 (Provision of Housing)
- H2 (Density and Mix)
- H3 (Affordable Housing)
- H5 (Standards for New Housing)
- H10 (Private and Communal Outdoor Space)
- TR1 (Achieving the Transport Strategy)
- TR3 (Access, Traffic and Highway Related Matters)

- TR5 (Car and Cycle Parking and Electric Vehicle Charging)

iii. Supplementary Planning Documents

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

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

5. The Proposal

- 5.1 The application seeks planning permission for the demolition of an existing single storey building and the erection of a new 3.5 storey building comprising 18no. homes, together with associated access, parking and landscaping.
- 5.2 The existing site access will be retained and enhanced to provide a shared surface to serve the proposed development. Parking and circulation is provided to the rear to replicate the existing situation.
- 5.3 The proposal retains a landscape frontage to Elgar Road South and shared amenity space provided to the rear of the building.
- 5.4 A more detailed description of the design and layout of the proposal is provided in the accompanying Design and Access Statement.

6. Planning Considerations

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

- The Principle of Residential Development
- Loss of Employment
- Impact on Residential Amenity
- Sustainability Measures
- Housing Mix, Density & Affordable Housing
- Technical Considerations:

- Ground Conditions & Contamination
- Landscape & Ecology
- Access, Parking & Cycle Storage
- Flood Risk & Drainage
- Waste Storage & Collection
- Section 106 HoTs

i. Principle of Residential Development

6.2 The site is located within the settlement boundary and within an established residential area, wherein the principle of residential development is acceptable. This is reflected in the pre-application advice from Officers.

ii. Loss of Employment

6.3 The employment protection policy (Policy EM3) sets out various considerations for proposals which result in a loss of employment outside of Core Employment Areas. The policy advocates a flexible approach to existing employment land to allow an appropriate balance of uses to develop in the right locations.

6.4 Criteria (iv) and (v) are considered to be most relevant to the context and proposed development. It states as follows:

(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?

6.5 Looking firstly at the affect of the continued employment use in the context of Criterion (iv), there is no detrimental impact on the amenity of the area. However, it is clear that the existing employment use is at odds with the prevailing residential character of the area. The site is not located within a protected employment area. The site is in fact located within a residential area and this site is the last non-conforming commercial use west of Elgar Road South. The introduction of residential development would accord with the surrounding land use and pattern of development in the area. The existing single storey building sits between a 2.0 storey building to the South and a 3.5 storey building to the North. In its present form it provides an uncomfortable transition in terms of scale. This issue is exacerbated by the flat roof form of the existing building against the prevailing pitched roof forms found on the western side of Elgar Road South. The combination of these factors mean that the existing building looks disproportionate in the street scene and jars with the general character of the area.

- 6.6 At present the site frontage contains landscaping but this is in the form of unmanaged grass which does not make any meaningful contribution to the character of the area. Similarly, the rear of the site is dominated by hardstanding. The proposed development includes a detailed landscape strategy and comprehensive planting scheme, including a significant reduction in hardstanding to the rear of the site. This will significantly enhance the character and appearance of the site and its contribution to the character and appearance of the surrounding area.
- 6.7 In relation to Criterion (v), the need for retention of the employment land, the site comprises Sui Generis and Office floorspace. The Sui Generis Use relates to the ongoing occupation of part of the existing building by the Driving Standards Agency (DSA) who are actively seeking to relocate elsewhere in Reading as the site no longer meets their operational requirements. The Office use has remained vacant for a period in excess of 12-months despite ongoing marketing. As such, there is no existing demand for the building.
- 6.8 Having reviewed evidence accompanying the Local Plan, it is clear that demand for office floorspace in Reading is primarily for serviced accommodation in the town centre or out of town business parks. The office accommodation provided on the application site is outwith this demand profile.
- 6.9 Taking into consideration the demand profile for serviced office accommodation and the lack of interest during the 12-month marketing period, there is limited need for retention of the existing employment uses on this application site in the context of Criterion (v).
- 6.10 The proposal satisfies two of the criteria in Policy EM3 and applying the policy in a 'flexible' way as intended, the loss of existing employment uses is considered acceptable.

iii. Residential Amenity

- 6.11 The proposed development is considered to have minimal impact on neighbouring amenity. The building is orientated along a north-south axis with principal aspect east and west to reflect the existing pattern of residential development on Elgar Road South.
- 6.12 The proposal has been reduced in scale and massing in response to pre-application advice from Officers and the application is accompanied by a Sunlight/Daylight Assessment (eb7) which confirms that the impact on neighbouring properties to the north, south and west is acceptable. It also confirms that the amenity of the proposed accommodation is of an acceptable standard.
- 6.13 The orientation and dual aspect nature of the building coupled with the traditional side-to-side and side-to-back (blank gable) relationships ensure that there is no direct overlooking of neighbouring properties.

6.14 Therefore, the proposed development is not considered to have an unacceptable impact on neighbouring amenity and is, as such, compliant with Local Plan Policy CC8.

6.15 All of the proposed dwellings meet the Nationally Described Minimum Space Standards (NDMSS) in response to Local Plan Policy H5. In response to pre-application advice from Officers, the proposal includes 460sqm of amenity space against a target of 465sqm under Local Plan Policy H10. This is considered to be an acceptable level of provision when taking into consideration the proximity of open Waterloo Meadows to the west, which offers open space and amenity provision for all age groups.

iv. Sustainability Measures

6.16 Similarly, the proposed dwellings will achieve water efficiency and carbon neutral requirements in accordance with Policy H5. The application is accompanied by a Sustainability Statement which confirms that the energy efficiency requirements can't be met through a combination of a 'fabric first' approach to construction and use of Solar Photovoltaics on south facing roof planes. Water efficiency requirements can be met through the specification of appliances and plumbing.

v. Density, Housing Mix and Affordable Housing

Density

6.17 Policy H2 a context-led approach to density, which balances considerations of character with the need to make efficient use of land. The proposal is considered to strike a comfortable balance in this respect. It provides a seamless transition in terms of scale and massing between two storey residential development to the south and four storey flatted development to the north. It respects the forward building line on Elgar Road South, retaining a significant portion of the frontage for landscaping. To the rear, it provides a suitable level of parking with amenity space in accordance with Local Plan requirements. Having managed this context and the requisite design/technical standards, the scheme can deliver a total of 18no. residential units based on the target housing mix set out in the Local Plan.

Housing Mix

6.18 The proposal provides a mix as follows:

Unit Size	No. of Units	Percentage of Total Mix
1 bedroom	8	44%
2 bedroom	9	50%
3 bedroom	1	6%

6.19 As noted in the pre-application response by Officers, two bedroom dwellings are considered to be capable of providing family accommodation and therefore the proposal provide 50% family dwellings in accordance with Local Plan Policy H2.

Affordable Housing

6.20 The proposal will provide compliant affordable housing in accordance with Local Plan Policy H3 and this will either take the form of 30% on site provision (5 no. dwellings) or a contribution in lieu. This matter will be discussed further during the determination period in consultation with the RBC Housing Officer.

vi. Technical Considerations

Landscape & Ecology

6.21 The Applicant's Ecologist, Windrush Ecology, has undertaken a Phase 1 Preliminary Ecological Assessment, which identified habitats of only negligible value and no evidence of protected species. The report includes recommendations for native species planting as part of any landscape strategy for the site and the provision of bird boxes given the local context. The applicant is also happy to accept a planning condition requiring the submission and approval of lighting for the site to limit any light spillage to Waterloo Meadows.

6.22 The application is accompanied by a Landscape Strategy which seeks to optimise opportunities to provide high quality amenity spaces for future residents of the site through soft landscaping proposals and incorporating native species planting to encourage biodiversity enhancement. Permeable hard landscaping (paving) is proposed to facilitate necessary drainage and to improve drainage of the wider area.

6.23 With these considerations in mind, the proposal is considered to comply with Local Plan Policy EN12.

Access, Parking and Cycle Storage

6.24 The site access arrangements are detailed in the accompanying Transport Statement. In summary, the position of the existing access to Elgar Road South would be retained and a new shared surface would be provided to serve the building and the parking/amenity space to the rear.

6.25 RBC's SPD identifies maximum standards and recognises that in certain situations, parking can be provided on a more flexible basis where alternative transport measures adequately serve the site. The pre-application response from Officers confirmed that the site is sustainably located and the proposed parking provision as set out in the accompanying Transport Statement reflects this. The proposal would provide 12 no. unallocated spaces (including 1 no. disabled space). Whilst not identified on the submitted Site Plan, the applicant is happy to invite a condition requiring the provision of 1 no. electric vehicle charging point.

6.26 Secure cycle storage is provided in the form of a communal store located within the building and with direct access to the shared surface area. This provides space for a total of 10no. cycles in accordance with the SPD requirements.

6.27 With these considerations in mind, the proposal is considered to comply with Local Plan Policies TR3 and TR5.

Flood Risk and Drainage

6.28 The Applicant's Drainage Consultant, Mayer Brown, has prepared a Flood Risk Assessment and Drainage Strategy, which concludes that the site is in Flood Zone 1 and is at very low risk of surface water, sewer and groundwater flooding.

6.29 With reference to surface water drainage, the report identifies the need to implement a Tier 3 Discharge Strategy, which discharges surface water into the public mains sewer. The surface water drainage system will be designed to accommodate a 1 in 100 year, plus 40%, climate change and 10% urban creep rainfall event. The detailed design can be secured through standard condition.

6.30 With these considerations in mind, the proposal is considered to comply with Local Plan Policies CC2 and CC3.

Ground Conditions & Contamination

6.31 The application is accompanied by a Phase 1 Contamination Assessment which identifies low – moderate risks that will require further assessment should planning permission be granted. It is anticipated that this further assessment work and any remediation would be secured and managed through an appropriately worded planning condition.

Refuse Storage & Collection

6.32 The proposed building includes a refuse store to accommodate 8no. 1100 litre Eurobins. This makes provision for general and recyclable waste in accordance with the RBC standards.

6.33 The accompanying Transport Statement sets out how collection will take place and a tracking diagram is provided to illustrate that this is achievable with the proposed site layout.

vii. Heads of Terms

6.34 It is anticipated that the following mitigation will be secured through a s106 Agreement alongside CIL payment for net additional floorspace.

- Affordable Housing
- Construction skills and end user employment
- Carbon Neutral Offset

7. Statement of Community Involvement

- 7.1 To ensure that the residents of all adjoining properties were made aware of the proposals, a leaflet was delivered which outlined the proposal, identified the applicant and provided contact details for any queries relating to the scheme.
- 7.2 A copy of the leaflet is attached at Appendix 1 for reference.

8. Conclusion

- 8.1 This application seeks planning permission for redevelopment comprising 18no. homes together with associated works, following demolition of the existing building. The proposal follows pre-application advice from Officers and the scheme has been tailored to positively address the matters raised in the response.
- 8.2 The application site is situated within the settlement policy boundary of Reading wherein the principle of redevelopment is supported by the adopted Development Plan. The site is highly sustainable in that it comprises previously developed land, which is located adjacent to existing facilities and amenities, and with excellent connections to high frequency public transport services.
- 8.3 The site is in an entirely residential context and as such the proposed redevelopment represents a better fit in terms of land use relationships. Furthermore, the existing single storey flat roof building is awkward in the streetscene and the proposal provides an opportunity to enhance the character and appearance of the site. These factors, in combination with recent marketing, are considered to justify the loss of existing employment uses from the site. The provision of an employment skills contribution provides further mitigation in this respect.
- 8.4 The proposals would deliver 18no. high quality apartments which are provided as one, two and three bedroom units to address the range of housing needs identified by the Development Plan. It would include 30% affordable housing provision to address the Council's more specific and critical housing needs.
- 8.5 A number of technical and environmental reports have been undertaken to support the application in accordance with the Council's Validation Checklist and in response to pre-application advice from Officers. These reports confirm that there are no insurmountable constraints to development and that the proposals achieve compliance with the respective policy requirements contained within the Development Plan and NPPF.
- 8.6 In summary, we consider the proposal to be a sustainable form of development and worthy of Officer support.

Appendix 1 – Neighbour Leaflet