

PLANNING REPORT

in support of

**Demolition of existing garage block and car repair garage
and erection of flatted development comprising
13 apartments and E(g) office building together
with parking, access and associated works**

on

**Land to the rear of 303-315 Oxford Road,
Reading, RG30 1AU**

On behalf of

First Avenue Estates Limited

D2 Planning Ref: 151/20

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September 2021

D2

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1. Pre-Application Response dated 19th April 2021

1. INTRODUCTION

1.1. This Planning Statement has been prepared to support a detailed planning application for the demolition of existing garage block and car repair garage and erection of a flatted development comprising 13 apartments and E(g) office building together with parking, access and associated works on land to the rear of 303-315 Oxford Road, Reading.

1.2. The purpose of this statement is to assess the site's potential to accommodate residential development.

1.3. The proposed development comprises: -

Demolition of existing garage block and car repair garage and erection of flatted development comprising 13 apartments and E(g) office building together with parking, access and associated works

1.4. These proposals represent the only development aspirations that the applicant has for the site. There is no intention to provide any further development in subsequent phases. This is an important issue and clearly indicates that no further development proposals are being considered.

1.5. In order to fully assess the application, this statement should be read in conjunction with the following information: -

- Application forms and ownership certificate;
- Design and Access Statement by Ascot Design (Chartered Architects)
- Transport Statement by Highway Planning Limited
- Flood Risk & Drainage Assessment by Abington Consulting Engineers
- Environmental Desk Study and Preliminary Risk Assessment by Apple Environmental
- Arboricultural Impact Assessment prepared by Harrison Arboriculture
- Ecological Appraisal by ECOSA Environmental Consultants
- Affordable Housing Statement by D2 Planning Limited

- Financial Viability Report prepared by Andrew Golland Associates
- Air Quality Assessment by Phlorum
- Energy Statement by SEES
- Environmental Noise Assessment by Paragon Acoustic Consultants

Plans

- Location Plan – Plan No. 17-P2212-LP01
- Topographical Survey
- Proposed Site Layout – Plan No. 17-J2212-100
- Proposed Site Layout (Colour) – Plan No. 17-J2212-101
- Proposed Floor Plans – Plan No. 17-J2212-103
- Proposed Elevations – Plan No. 17-J2212-102
- Proposed E(g) Office Floor Plans & Elevations – Plan No. 17-J2212-104
- Proposed Bin Store & Garage Floor Plans & Elevations – Plan No. 17-J2212/105
- Proposed Street Scene – Plan No. 17-J2212-106

1.6. This statement, along with the above reports and plans , should be read as a complete package. It sets out details of the proposed development, an appraisal of the site and surrounding area, site planning history and an assessment of key planning issues within the context of relevant planning policy. These issues should all be considered in the determination of the application.

1.7. In summary, the proposal is consistent and in accordance with the National Planning Policy Framework (NPPF) and Local Plan policy. The site and development are most sustainable, with the site being allocated for residential development in an up to date adopted Development Plan.

Pre-Application Enquiry

- 1.8. The applicant has carried out pre-application consultation with both the Planning Authority and a range of local residents and other interested parties e.g. where possible local elected officials in Reading Borough Council and local police officer for the area.
- 1.9. A number of discussions have taken place with the Planning Authority regarding the form and nature of development on site. The Planning Authority's latest correspondence dated 19th April 2021 (Appendix 1) identified that the site is allocated for residential development in the adopted development plan. It stated: -

“In conclusion, it is clear that any development of this site will be challenging and in light of the site’s unique site circumstances and evident constraints, you should be under no illusions about the difficulties associated with developing this site. It is considered in overall terms that whilst there has been positive progress in some respects since the 2018 pre-application submission, particularly in respect of the overall design idiom, there remain strong concerns over the amount of development currently proposed – combined with the significant amount of hardstanding - and the need for more generous soft landscaping/amenity space. In this instance, the onus will be on you to seek to justify the proposals to officers, both in terms of a number of individual matters as above and in overall terms too.

It is noted that there is a potential conflict between transport officers requiring on-site parking spaces and the natural environment/planning officers specifying that outside amenity space/soft landscaping provision should be increased/improved. As discussed at our meeting, and given the sites accessible location, a car-free development could be supported in this instance. However, in instances where there are competing demands, it will ultimately be for the planning officer to weight these up as part of the overall planning balance as part of the determination of the application. This will be based on the proposals at application stage and the justification submitted in order to explain why one element may outweigh another. As is currently considered to be the case, the extent of the development and

associated hardstanding is too much when all factors are taken into account. With the quantum of development reduced, as discussed, this would enable a more suitable overall development which, whilst might not provide suitable parking, would provide more appropriate space and soft landscaping. As it stands, and as discussed, the proposals currently represent an overdevelopment of the site.”

- 1.10. Following the pre-app and the officer’s comments, the footprint of the block was shrunk and slightly redesigned to: -
- i. Increase areas of landscaping
 - ii. Increase areas of amenity
 - iii. The decision not to incorporate a ‘zero parked’ scheme, as suggested, was taken as it is not only commercially unviable but will, without doubt increase parking pressure on Western Elms Avenue and surrounding roads.
 - iv. Reduce bulk and mass.
 - v. To be more sympathetic in its relationship with 3 Western Elms.
 - vi. To move the block back from Western Elms to allow for more landscaping.
 - vii. To allow for additional tree planting on Western Elms Avenue.
- 1.11. It is felt that these amendments address officer’s concerns and comments and show compromise where possible.
- 1.12. The application seeks to take into account the pre-application advice where possible and practicable. It also seeks to address issues raised by the interested parties. It is considered that the redevelopment of the site complies with relevant policies in the statutory development plan and that there are a range of benefits which can be provided as a result of the redevelopment of the site.

2. SITE AND SURROUNDINGS

- 2.1. The site exists as a large tarmacadam and concrete covered section of land comprising various domestic vehicle garages, timber outbuildings and a steel-panelled motor repair garage. The application site boundary also extends across the rear gardens of 311 and 313 Oxford Road.
- 2.2. The motor repair garage lies on the eastern section of the site, and has concrete flooring with a brick extension on the southern facade. Adjacent to this extension there is an external storage area where items such as tyres, wooden pallets and other unwanted items have been deposited. There was also an area of hydrocarbon staining noted. The ground surface at the site is generally in a poor condition with many cracks and other damage noted. Overgrown vegetation is also present in some areas.
- 2.3. The other buildings on the site exist as either brick-constructed domestic vehicle garages or small timber shed-type structures; one of which was seen to have (presumed) asbestos roofing.
- 2.4. The aforementioned large garage and filling station site to the immediate east of the site now exists as a Lidl supermarket and fast food chain. A right of way exists through the site to the Lidl supermarket. Access to the Oxford Road Community Garden is also achieved through the site.
- 2.5. The photographs below show some of the features highlighted above.



The site from the south



Motor repairs garage on eastern section



General storage adjacent to the repair garage



Northern section of the site



Timber buildings on the southern section



Domestic garages on the western section



Rear garden section at No. 311



Access onto the site

- 2.6. Indeed, as stated and is clear from the photographs, the site is in a state of disrepair and adds little to the visual appearance or character of the area. Indeed, it detracts from the character of the area. Furthermore, the site is subject to long standing anti-social behavioural issues that have caused significant ongoing problems for local residents and the police.
- 2.7. The site does not lie within a Conservation Area nor are any of the buildings included in the statutory list of historic buildings.
- 2.8. The site comprises an area of previously developed land which detracts from the character and appearance of the area. The visual appearance of the site together with the anti-social behaviour issues render its redevelopment important considerations for local residents and occupiers.

3. APPLICATION PROPOSALS

- 3.1. The proposals are explained in some detail within the submitted Design and Access Statement. All of the existing buildings are to be demolished and the site redeveloped for a new scheme of 13 flats and a Class E(g) office unit. There are a number of legal requirements with the various titles that need to be provided as part of any redevelopment e.g. retaining access and parking provision for various occupiers. These are important legal considerations which must be taken into account in any redevelopment proposals and were explained fully at the pre-application stage (see plan below).



- 3.2. The proposals provides for 6 No. x 1 bed and 7 No. x 2 bed units. It was not considered appropriate on this occasion to provide family-sized 3-bed units due to the unsuitability of the site close to the Oxford Road and also the limited opportunities to provide amenity space, owing to the high level of replacement parking required within the site.

- 3.3. A financial viability appraisal of the proposed development is included with the application. This demonstrates that given the constraints of the site and the likely sales values that the development is unviable with any affordable housing provision (or financial contribution).
- 3.4. The existing private parking spaces currently provided on the site are to be retained and relocated.
- 3.5. The application site will continue to provide access to the rear of multiple Oxford Road properties as well as provide access to their parking spaces, most of which will be accommodated on the application site. This provision includes garages for 311 and 313 with their private parking court and gates. A legal Right of Way has been retained for access and parking to No's 303, 305 and 307 Oxford Road as demonstrated on the site plan.
- 3.6. This parking court presents itself as a problematic and unsightly area which, due to its run-down and clandestine character, is being used for undesirable activities including drug dealing and consumption with all its associated problems such as prostitution.
- 3.7. The proposed development would significantly improve the appearance of this part of Western Elms Avenue while preventing the continuation of such activities by creating a transparent and open parking arrangement for associated properties and business.



4. PLANNING HISTORY

- 4.1. The site has a lawful use for car repairs in the coach or stable building at the rear of the site together with a range of timber garages which are used in the main for storage, parking etc.
- 4.2. With regards any planning history on the site, relevant applications include: -

To the rear of 313 Oxford Road (Western Elms Avenue)

Application No. 14111/FUL	Two storey detached dwelling following demolition of existing garages with access for future determination (withdrawn)
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303 Oxford Road

Application No. 071461/FUL	Erection of two storey building to accommodate 3x 1 bedroom and 2x 2 bedroom flats and car parking for occupants for neighbouring buildings and for the proposed flats (refused)
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Application No. 070718/FUL	Development of 5 flats – 3x 1 bed and 2x 2 bed (refused)
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Comment

- 4.3. None of the previous applications involved a comprehensive redevelopment of the site, unlike the current application proposals. Furthermore, the site was not allocated for residential development in any statutory development plan during any of these applications.

5. PLANNING POLICY CONTEXT

- 5.1. 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.
- 5.2. The statutory development plan for the purpose of this application comprises: -
- Reading Borough Local Plan adopted November 2019
 - Reading Borough Site and Detailed Policies Document

Reading Borough Local Plan (2019)

Policy WR3h	Rear of 303-315 Oxford Road, (Development for Residential development)
Policy CC1	Principle in Favour of Sustainable Development
Policy CC2	Sustainable Design and Construction
Policy CC3	Adaption to Climate Change
Policy CC4	Design and Public Realm
Policy CC8	Safeguarding Amenity
Policy EN12	Biodiversity and The Green Network
Policy EN14	Trees, Hedges and Woodland
Policy H1	Provision of Housing
Policy H2	Density and Mix
Policy H3	Standards for New Housing
Policy H11	Development of Private residential Gardens
Policy H14	Suburban Renewal and Regeneration
Policy TR1	Achieving the Transport Strategy
Policy TR3	Assess Traffic and Highway Related Matters

- 5.3. The site is allocated for residential development in the adopted Reading Borough Local Plan under Policy WR3h as follows: -

“REAR OF 303-315 OXFORD ROAD**Development for residential.****Development should:**

- **Retain rear access for properties on Oxford Road;**
- **Only take place as a comprehensive development rather than parts of the site;**
- **Avoid adverse effects on trees protected by TPO;**
- **Address air quality impacts on residential use;**
- **Address noise impacts on residential use; and**
- **Ensure appropriate back-to-back separation from existing residential.**

Site size: 0.22 ha 14-20 dwelling”

National Planning Policy Framework (NPPF) (July 2021)

- 5.4. As well as emerging Development Plans, there are other material considerations, Section 70 (2) of the Town and Country Planning Act 1990 requires that all material considerations are taken into account. Material considerations in this instance relate primarily to the NPPF.
- 5.5. The NPPF sets out the Government’s planning policies for England and how these should be applied. The sections of most relevance to this proposal are summarised below.
- 5.6. Paragraph 8 explains the purpose of the planning system is to contribute to the achievement of sustainable development. This means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. These comprise economic, social and environmental objectives.
- 5.7. Paragraph 10 highlights the presumption in favour of sustainable development. For decision taking this means that development proposals that accord with an up to date Development Plan should be approved “without delay”.

- 5.8. Paragraph 60 confirms the Government’s objective of significantly boosting the supply of homes.
- 5.9. Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 5.10. Paragraph 119 explains that planning decisions should support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.11. Paragraph 126 states “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 5.12. Paragraph 130 states planning decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.

6. PRINCIPLE OF DEVELOPMENT

- 6.1. The site is located within the settlement boundary of Reading and abuts an established residential area. Furthermore, the adopted Local Plan specifically allocated the site for a residential development. The principle of residential development is therefore acceptable and this was confirmed during the pre-application discussions.
- 6.2. Furthermore, the NPPF makes it clear that: -
- It is the Government's objective to significantly boost the supply of houses (paragraph 60);
 - Small and medium sized sites can make an important contribution to meeting housing requirements (paragraph 69);
 - Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed where this would help meet identified development needs (paragraph 124); and
 - Local Planning Authorities should make maximum use of previously developed land opportunities.
- 6.3. The proposed development of 13 flats and a small office scheme would contribute to meeting the Borough's housing and economic needs. The principle of residential development on the site is not at dispute particularly as the site is allocated for development in an up to date Development Plan i.e. the adopted Reading Borough Local Plan 2019.

7. ACOUSTIC

- 7.1. An Acoustic Assessment was undertaken by Paragon Acoustic Consultants in support of the proposals. The report concludes that: -

“A detailed review of facade sound insulation requirements has been carried in respect of Development of land at the rear of 303-313 Oxford Road & 3 Western Elms Ave, Reading RG30 1AU.

It is concluded that subject to adoption of the recommendations set out herein, external noise ingress to internal areas with windows closed should be controlled to values as per the guidance provided in the pre-application as set out in BS 8233:2014 and hence adequate internal residential amenity should in principle prevail. Details of the ventilation assessment have been provided for the Local Authority consideration.

Comments have been provided regarding external amenity space predicted noise levels for the Local Authority consideration.

Sufficient information is considered to be presented herein to allow Reading Borough Council to technically review the proposals.”

- 7.2. In view of the above, the proposals comply with Policy WR3H in respect of noise.

8. FLOOD RISK AND DRAINAGE ASSESSMENT

- 8.1. A Flood Risk and Drainage Assessment has been prepared by Abington (Consulting Engineers). The report concludes that: -

“The proposed development complies with the requirements of the Sequential Test set out in the NPPG.

No significant flood risks have been identified other than pluvial flooding which will be eliminated from the proposed residential building by elevating the finished floor level.

The SUDS hierarchy has been adhered to.

Appropriate surface water drainage management will ensure that the development will be safe from surface water run-off and there will be no increased run-off from the development.”

- 8.2. In view of the above, the proposals comply with Policy EW18 (flooding and sustainable drainage).

9. ENERGY/SUSTAINABILITY

9.1. An Energy Statement has been submitted in respect of the proposed development and states: -

“Reading Borough Council require that new major developments (over 10 dwellings) achieve zero-carbon emissions, with a minimum 35% reduction in carbon emissions to be delivered through energy efficiency and renewable energy on-site and the balance of emissions being offset through a carbon offset contribution.

SAP calculations have been carried out for several energy strategy options and a number of viable energy strategy identified which are capable of meeting the requirements of the planning policy.

Four options are presented (Section 5), each with their own merits, and are fully capable of satisfying the planning policy as necessary:

- Option 1 – High Performance Building Fabric, Gas Combi Boiler & PV**
- Option 2 – High Performance Building Fabric and ASHP**
- Option 3 - High Performance Building Fabric, Panel Heaters, Heat Pump Water Heater & PV**
- Option 4 – 2 Stage exhaust air heat pump with heat recovery ventilation.**

Each of these options will be review in more detail at detailed design stage for technical and economic feasibility, at which point one or a combination of the strategies will be selected.

	Estimated Demand Reduction (%)	Estimated CO2 emissions reduction (%)
Option 1 - Gas Combi + PV	29.9%	35.7%
Option 2 - ASHP	58.8%	38.7%
Option 3 - Panel + EDEL + PV	56.9%	35.8%
Option 4 - NILAN	63.8%	46.1%

Table 6: Summary of Results

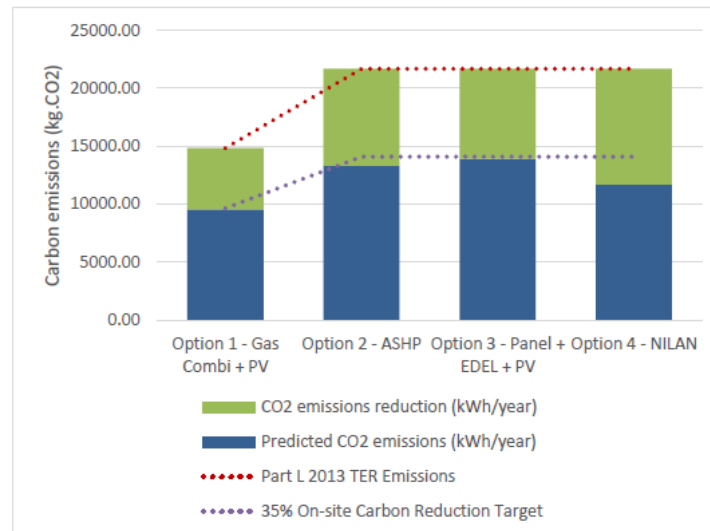


Figure 10: Part L 2013: Carbon Emissions Reduction

It is considered that the proposed energy strategies are consistent with the National Planning Policy Framework and the policies of the Reading Borough Council and local authority and when implemented will provide an efficient and low carbon development.”

9.2. The proposals comply with Policy CC3 of the Local Plan.

10. BIODIVERSITY

10.1. An Ecological Assessment of the site has been carried out by ECOSA. It concludes that: -

“The main findings of the Ecological Impact Assessment are:

- **The site comprises common and widespread habitats however, to ensure that no net loss of habitats occur as part of the proposals a Biodiversity Metric Assessment will be required;**
- **The site contains suitability for foraging and commuting bats, nesting birds and European hedgehog;**
- **Enhancement measures include the provision of native species planting, the erection of bat roosting and bird nesting features on the newly constructed buildings and the creation of European hedgehog passing holes.**
- **Given the impacts identified, and the mitigation, compensation and enhancement measures proposed it is considered that the proposals accord with all relevant local and national planning policy.**
- **If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 18 months of the date of the most recent relevant survey.”**

10.2. In view of the above, the proposals comply with Policy EN12 of the adopted Local Plan.

11. TREES

- 11.1. A detailed tree survey has been carried out in support of the proposed development by Harrison Arboriculture. The report concludes that: -

“It is my conclusion that the tree removals require only grade C or U trees which should not pose a constraint to the development and little or no contribution to the wider landscape. Landscaping to include tree planting could mitigate for their loss in the long term.

The proposed development would not have adverse impacts on the long-term vitality of the retained trees providing the methodology set out in this document are followed.”

- 11.2. The proposals are accompanied with a detailed landscaping scheme which demonstrates that additional landscaping would be provided as part of the proposals. The proposals therefore comply with Policy CC4 (design and public realm) and EN14 (trees, hedges and woodland).

12. TRANSPORTATION

- 12.1. A Transport Statement has been prepared by Highway Planning Limited in support of the proposals. It concludes that: -

“The site is located within an established residential area with excellent access to day-to-day facilities and public transport.

The proposed access arrangements will reduce the number of access points to the highway and materially improve pedestrian conditions in the vicinity. The layout of the development accesses complies with the required standards and will provide a safe means of access for pedestrians and motorists.

The proposed site layout complies with the Parking Standards and Design SPD requirements for car and cycle parking provision.

Overall, there are no highway related reasons why the development should not receive planning permission.”

- 12.2. In view of the above, the proposals comply with Policy TR15 (access, traffic and highway related matters), TR1 (delivering a transport strategy) and TR5 (car and cycle parking and electric vehicle charging) together with the relevant SPD.

13. BENEFITS

- 13.1. There are a range of benefits which will be provided as part of the proposals and these are set out under the headings related to economic, social and environmental dimensions for sustainable development as outlined in the NPPF.

Economic benefits

- 13.2. The inclusion of housing within the Ministerial Statement as an economic generator particularly post COVID is an important consideration for these proposals particularly as the site is allocated for residential development. This is enshrined in the NPPF, for example the importance of the economic role in paragraph 8.
- 13.3. Providing new housing in accessible locations would assist the local economy through construction jobs and jobs in the supply chain as well as retail sales for new domestic products such as carpets and white goods. The proposals would provide local employment opportunities which will create investment and jobs. The small office scheme would also provide employment opportunities.
- 13.4. The Government has made it very clear in respect of growth for the key role that housing building has an important role in the economy. The NPPF addresses the economic role: -

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

- 13.5. In terms of the financial benefits, the following can be achieved by the development: -
- New Homes Bonus as well as additional Council Tax revenue.
 - Direct construction jobs during the period of development which would take up to 2 years plus indirect jobs.
 - Additional expenditure in the local area relating to leisure and retail facilities.
- 13.6. The site is of the right type and in the right place being free of technical constraints and in a sustainable location. It would support growth and give a boost to the housing

land supply in this market area providing for elderly persons. In terms of infrastructure, there are no capacity issues relevant to the proposals.

Social Benefits

13.7. The social dimension of paragraph 8 of the NPPF states: -

“..to support strong vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.”

13.8. With regards housing this is a bespoke flatted scheme which will provide accommodate for first time buyers in a sustainable location. This represents a significant benefit which should be attributed significant weight particularly given the relevant policies in the adopted Local Plan which allocates the site.

13.9. The redevelopment of the site should eradicate the long history of anti-social behaviour that has taken place on the site from drug trafficking and usage together with anti-social behaviour. This is a significant factor that will greatly benefit the local neighbourhood.

Environmental Benefits

13.10. The third dimension of paragraph 8 of the NPPF is as follows: -

“...to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

13.11. The development will utilise a brownfield site which is in a state of disrepair and greatly improve the character and appearance of the site and the surrounding area. These are considerable benefits which cannot be underestimated. The site is within

the existing built-up area and relevant policies are permissive towards the site coming forward.

- 13.12. The site is located next to Oxford Road. It has also been demonstrated how the development can be successfully assimilated into the local area. There are no justified objections to the proposals based on flooding, drainage, noise, air quality or cultural heritage i.e. archaeology.
- 13.13. Furthermore, there are no adverse impacts on the ecology of the site or wider area. Indeed benefits can be provided which include bat and bird boxes together with additional landscaping which would provide new habitats.
- 13.14. Finally, the development produces a high-quality bespoke development with high quality local materials. The scheme will provide an enhancement to this part of Reading.

Comment

- 13.15. The proposals comply with the three strands of sustainability as outlined in the NPPF. The NPPF does not require proposals to be positive in all 3 strands of sustainability but the proposals do in fact meet the 3 strands.

14. CONCLUSIONS

14.1. The proposals seek the redevelopment of the site with a high quality flatted scheme and a small office development. The site is allocated for residential development in the adopted Local Plan. Accordingly, there is no objection to the principle of development on the site particularly given that the majority of the site comprises previously developed land and the proposals would greatly improve the character and appearance of the area and the reuse of a site which has a long standing local problem of anti-social behaviour.

14.2. It has been demonstrated that there are no objections to the proposals based on highways, access, flooding or drainage. Furthermore, there are no environmental issues particularly given the poor state of the site and the lack of any biodiversity interest. The proposals would in any event provide a range of benefits which include:-

- The removal of a range of unsightly buildings
- Development on previously developed land
- A range of housing to meet first time buyers
- A small office scheme to help provide employment opportunities
- Biodiversity improvement over what currently exists
- A high quality development which would improve the character and appearance of the area
- The removal of the anti-social behaviour that has been ongoing for many years.

14.3. In view of the above, it is requested that planning permission is granted.

APPENDIX 1

Pre-Application Response dated 19th April 2021

Frances Martin
Head of Planning, Development &
Regulatory Services

Civic Centre, Reading, RG1 7AE
☎ 0118 9373787
Our Ref: 201869/PREAPP

Mr Des Dunlop
Via email only:
dsdunlop@d2planning.co.uk

Direct: ☎ 0118 937 4085
e-mail:
ethne.humphreys@reading.gov.uk

19th April 2021

Your contact is: Ethne Humphreys, Planning

Without prejudice

Dear Mr Dunlop,

Re: 201869/PREAPP - Pre-application advice for flatted development comprising 14 apartments together with parking.

At: Land to Rear of 303-315 Oxford Road, Reading

This letter is in response to the above pre-planning application enquiry received 4th January 2021 and our virtual meeting 16th April 2021. Further to our recent correspondence, my apologies for the delay in this being issued.

Site description

The site relates to the rear of No's 303 and 315 Oxford Road with access from Western Elms Avenue. The site currently comprises garage blocks that are generally in a poor state of repair and many of which are vacant. The site also comprises part of the rear curtilage of 311 Oxford Road, which is served by a separate access to the southern site boundary. A right of way exists through the site to the Lidl supermarket, beyond the eastern boundary. Access to the Oxford Road community garden is also achieved through the site.

The site is within an Air Quality Management Area. Half the site is within the Oxford Road West District Centre.

Policy WR3 (WR3h) of the Reading Borough Local Plan identifies that the site has been allocated for comprehensive residential development, comprising 14-20 dwellings. The policy establishes principles which any development for this specific site must adhere to including:

- retain rear access for properties on Oxford Road

- only take place as a comprehensive development rather than parts of the site
- avoid adverse effects on tree protected by TPO
- address air quality impacts on residential
- address noise impacts on residential use and
- ensure appropriate back-to-back separation from existing residential

The proposal

The proposal as described is for a flatted development comprising 14 apartments together with parking. The proposals consist of a 3 storey building comprising 13 flats, with 1 further flat located over a garage. The mix of units would comprise 6x1 bed and 8x2 bed units. Indicative soft landscaping and tree planting is shown on the plans as is cycle and bin storage. Access would be maintained to the rear of properties on Oxford Road and a separate access to Western Elms Avenue would serve a double detached garage and two parking spaces for use by the residents of 311 and 313 Oxford Road.

Relevant Planning History

Extensive history; most relevant:

181033/PRE Erection of building comprising of 13 no. apartments following demolition of existing garages/stores. Provision of replacement parking for Oxford Road properties. Sent 9/11/2018

140111/FUL Two storey detached dwelling following demolition of garages with access for future development. Withdrawn.

120926/FUL Demolition of existing garages and erection of five three-storey dwellings with associated car parking. Refused.

071461/FUL Erection of a 2 storey building to accommodate 3 x 1 bedroom and 2 x 2 bedroom flats and car parking for occupants of neighbouring buildings and for the proposed flats (resubmission of 06/01067/FUL). Refused.

070758/FUL Development of 5 flats - 3 x 1 bed and 2 x 2 bed - at land to rear of 303-309 Oxford Road with parking accessed from Western Elms Avenue. Refused.

Relevant Policies

Any planning application at the site would be considered within the context of the Reading Borough Local Plan 2019. RBC Supplementary Planning Documents would also be applied where relevant, together with national guidance (the NPPF). Please use this link to view the local policies: <https://www.reading.gov.uk/planningpolicy>

Appraisal

Principle of Development

The National Planning Policy Framework (2019) encourages the effective use of land by reusing land that has been previously developed (brownfield land) and seeks that all housing applications should be

considered in the context of the presumption in favour of sustainable development. Policy WR3h of the Reading Borough Local Plan 2019 identifies the site for comprehensive residential development for between 14-20 dwellings. The proposed development is generally in accordance with this policy and the principle of development is therefore acceptable.

Furthermore, in purely land use terms, the provision of additional housing would broadly comply with the principles of Policy H1 by contributing to meeting the housing needs within the Borough.

Notwithstanding the site allocation, for clarity and completeness it would be required for the loss/re-arrangement of the existing use to be clarified and justified. More specifically, Officers would need to be satisfied that loss/reduction in number of garages would not displace parking facilities that are in use. Whilst the supporting letter states that some of the garages are vacant, it is not clear which or how many or whether vacancies have been for short or long periods of time and/or their reasons for being empty?

Your future submission should make it explicitly clear what the status and use of the existing garages are; therefore, Officers would require the following details:

1. Identification of who the garages are currently owned by.
2. The present take up/usage of the garages
3. Clarity regarding any on-site replacement facilities

Further to clarification of the above, and in pure land use terms, the principle of residential development is considered acceptable. However, the acceptability of the use of the site for residential purposes would also be subject to the following material planning considerations:

Design Considerations/Impact on Street Scene

The NPPF (Para 124) sets out that good design is a key aspect of sustainable development. The recently published National Design Guide identifies 10 key components for good design and of particular note is the characteristic of 'Context' and it states that *"well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones."* Additionally, there is specific reference to 'views inwards and outwards'.

Policy CC7 aims to preserve or enhance the character of the area in which a development is in terms of layout, landscape, density, scale, height, massing, architectural detail and materials.

The proposals would largely be seen within the Western Elms Avenue street scene context. The immediate surrounding area of which is characterized by large detached and semi-detached houses set within relatively spacious plots. The garages to be demolished are not considered to be of any particular architectural merit to warrant their retention and there is no objection to their demolition (subject to considerations as detailed above) in design/heritage terms. Nevertheless, their diminutive scale means that they are relatively unobtrusive in the street scene, contributing to the spaciousness

of this part of Western Elms Avenue. Within this context, and subject to a proposed building being of high design quality, there is unlikely to be any objection from officers to the removal of the existing garages, but the replacement building must be appropriate in all other aspects (which is detailed further below).

As above, the proposed building would form part of the Western Elms Avenue street scene. To each side of the road, there is a setback of at least 10m to the highway, which allows for open frontages with a verdant character. There is also an established building line along this part of Western Elms Avenue to the south of the site. Whilst the existing garages are forward of this building line - and whilst acknowledging their somewhat rundown appearance - their single storey nature means that they do not detract from the spaciousness of the character of the area.

The main proposed building would be set considerably forward of this established building line. It is recognised that advice given under pre-application 181033 was that a minimum set back of 6-8m from the highway would be considered appropriate. In this respect, the 7m setback proposed is acknowledged - and in itself an improvement on the previous scheme. The other constraints within the site (land ownership/legal rights of way and retaining parking provision) which have necessitated the siting of the building towards the front of the site are also acknowledged. As considered under 181033, given that the proposed building would effectively constitute the head of development on this side of Western Avenue, and acknowledging the building line of Oxford Road, a degree of flexibility with the building line may be appropriate. However, there remains a concern that the proposals, set so far forward of the Western Elms building line, combined with the amount of hardstanding to be retained/proposed - and resultant shortfall in landscaping that would be expected for a development of the size - is indicative of overdevelopment of the site.

In terms of detail design, notwithstanding that not all proposed elevations have been provided (lacking sides and rear and of the FOG) the proposal appears generally reflective of the general style of other properties in the surrounding area in terms of materials, brick/window patterns and noting other buildings of a similar ridge height. The Council's Urban Design and Conservation Officer (CUDO) has looked at the proposals and considers the proposed scale and height, in itself, to be acceptable within the context of the Western Elms Avenue street scene. The CUDO has, however, suggested that the massing of the proposed building is revised so that the left half (2.5 storey element) as shown, is positioned to the right. Whilst Officers agree that this would result in a better transition in relation to the two storey building to the south, (3 Western Elms Avenue) there is a concern that a 3 storey element in a revised position combined with the significant forward location would result in an overly dominant form of development. A reduction in the number of units, to result in an associated reduction in built form, would aid this.

On the basis that the FOG would be located adjacent the rear northern boundary this would appear to be somewhat disjointed from the scheme and not reflective of the existing pattern of development or the proposed scheme as a coherent whole.

Further to the above, advice was given under pre-application 181033 that a building accommodating closer to 10 units would likely overcome many of the issues raised by the (then) current proposal -

which was for 13 units. This current scheme, rather than reducing the number of proposed units, has increased from 13 to 14 and, as above, a number of issues remain.

It is recognised that the site allocation (WR3h) indicates residential development of 14-20 units. I would comment that the subtext to the Policy at paragraph 7.3.13 confirms that the figures are intended as a guide and ultimately the capacity of sites will depend on various factors that need to be addressed at application stage, including detailed design and layout. It further states that the fact that a site is allocated in WR3 does not preclude the need to comply with all other policies in the local plan.

Given the above, whilst the setback of 7m from the highway is acknowledged, and the overall design is considered more appropriate, it remains the case that many of the issues raised above could be overcome/lessened with a reduction in the number of units (closed to 10 as previously advised) and associated reduction in built form. This would also further reduce the number of parking spaces required and allow for more soft landscaping which is appropriate.

As it stands, it is not considered that the proposed development would sufficiently harmonise with the existing residential character of the area, particularly with regard to the Western Elms Avenue street scene, at conflict with Policy CC7 of the Reading Borough Local Plan 2019.

With the above in mind, and mindful of the site allocation and constraints of the site, should you choose to seek to progress your proposals, it is considered that such a scheme may benefit from specialist design input from the Reading Design Review Panel (DRP). For the purposes of this pre-application enquiry I considered it premature for the scheme to be considered by the DRP given the level of information currently provided. However, in finding a way forward, and with a revised scheme, it could be an appropriate/helpful route to go down. If this was something you were willing to consider, this could be undertaken as an extension to this pre-application advice query.

For your future information, please see below some general information about the DRP process:

The DRP has been set up in partnership with local architects and meets once every 4 weeks, usually on a Thursday afternoon starting at 2pm - in Covid-19 circumstances, this is being undertaken over a virtual conference. The Panel comprises mostly architects, although there are a small number of other design professionals, e.g. landscape architects, urban designers. It will primarily comment on design and urban design matters associated with an application. Each Panel will comprise 4-6 Members taken from a larger rota of members. As the case officer, I will also be present. The format enables either the case officer or representatives of the applicant to briefly present the pre-application proposals to the Panel and to answer questions put by members of the Panel. The panel will then consider their views on the proposals. Those views will be conveyed back to you in writing by email. You would be invited to send a representative to the Panel to present your proposals. Scheme details would be provided in the form of a PowerPoint presentation and should be timed to last no more than 15 minutes (it is advisable to limit the number of slides to enable presentations to be limited to the allotted 15 minutes). Panel members will be sent the information you have already submitted in advance of the meeting, so they will have already had an opportunity to familiarise themselves with your proposals in advance of the meeting. For the panel to effectively review your proposals the

submission should, as a minimum, include a site analysis, explanation of design concept, illustration of how the proposals work in the local context and materiality. A clear narrative as to how the proposals have been developed should also be included. The Panel will usually ask questions that will be programmed to take up a further 15 to 20 minutes. Following questions, applicants and/or their representatives will be asked to leave the meeting. The Panel will consider the proposals at the meeting and the Chair will provide agreed written conclusions shortly after the Panel (usually within 14 days). I will convey the conclusions to you and will use them as the basis for providing written advice and any further discussion on the design of the proposals. Where there are particular issues or where a scheme is subject to significant re design, it may be appropriate for proposals to be considered more than once by the DRP. You should note that the Panel currently uses the following checklist to consider applications in the context of the advice on design in the National Planning Policy Framework and in the policies that make up the Reading Borough Local Plan 2019 eg CC7 etc.

- Site	- Building	- Sustainability	- Detailing
- Layout - Urban Structure & Grain	- Layout - Density & mix	- Energy	- Craftsmanship
- Character of area	- Scale	- Materials	- Functional
- Quality of public realm	- Massing	- Water	- Longevity
- Landscape - continuity & enclosure	- Appearance	- Access	- Weathering
- Orientation	- Function	- Health	- Structurally honest
- Vehicle circulation	- Outlook	- Waste	- Historically correct
- Pedestrian routes	- Legibility	- Reuse	-
-	- Adaptability	- Inclusivity	-

Planning benefits

Further to the above concerns raised, officers will weigh up competing demands in any application submission, to make a balanced, informed and justified recommendation. To assist officers in our future assessment, you should make clear in any future submission what you consider to be the planning benefits of the proposals. This should be through submission of a planning benefits statement, which should also clearly demonstrate how the proposals align with the WR3h as referenced above. Ultimately, this will assist officers in weighing up the merits of the proposals, to come to a well justified conclusion. This is evidently a relatively complex proposal within a challenging context, and hence a planning benefits statement can assist in articulating what you consider to be the merits of the scheme.

Impact on Neighbour Amenity

Policy CC8 (Safeguarding Amenity) seeks to ensure development does not cause harm to the living environment of existing properties, in terms of loss of privacy, overlooking and visual dominance, amongst other things. Policy EN16 (Pollution and Water Resources) seeks to protect surrounding occupiers from the impact of pollution.

Notwithstanding the concerns raised above, the position of the proposed building itself would be sited far enough away from nearby properties such that it would be unlikely to result in any overbearing effects. However, there is a concern that the positioning of windows on the side elevations of the main building (not known at this stage) could result in a perception of overlooking - if not actual - to the rear of 311-315 Oxford Road and regard should be had to careful placement of windows/use of obscure glazing to prevent loss of privacy.

Based on the plans submitted, it is not clear at this stage where the 'FOG' unit is actually proposed and what impact that could have on neighbouring amenity, or that of other units proposed. On the basis it is located adjacent the rear northern boundary, whilst it is unlikely to result in any overbearing effects, and as above, whilst not encouraged as part of the scheme, you would need to ensure that the position of windows would not lead to overlooking between different future occupiers and occupiers of neighbouring properties.

Overall, the loss of the existing garage use of the site itself is likely to be beneficial to the amenity of existing nearby occupiers in terms of removal of a source of potential noise and disturbance. However, if progressing your proposals, you will need to clearly demonstrate that they would not result in any material loss of light, privacy, overbearing impact to any neighbouring property, in compliance with Policy CC8 of the Reading Borough Local Plan 2019.

The impact on neighbouring amenity can only be fully assessed at the time of any future application and through an officer site visit to the site at that time, in order to gain a fuller understanding of the existing/proposed relationship.

Quality of Residential Accommodation

Policies H5 (Standards for New Housing) set out the standard to which all new build housing should be built. In particular, new housing should adhere to national prescribed space standards. Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.

In terms of unit sizes Policy H5a requires that all new build housing outside of the Reading Central Area is built to national space standards. The accommodation schedule on the proposed floor plans indicates that the proposed units would largely meet the national space standards in terms of overall unit size. Individual bedroom sizes should also comply which is not known at this stage. All units should provide suitable outlook, ventilation and daylighting for future occupiers. In your future submission it is strongly advised that you include a specific Policy H5 statement, responding explicitly to the applicable elements of the policy.

Policy H10 deals specifically with private and communal space and requires such space to allow for

sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. *"The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity"*. Para 4.4.87 of the RBLP sets out that *"in the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals: (b) Flats outside central Reading: 1 and 2-bedroom: 25 sq m per flat, 3 or more bedrooms: 40 sq m per flat.."*

It would appear from the proposed site plan that 3 amenity areas proposed, one at the rear of the site and two at the front, and two terrace areas. In practical terms, I am unconvinced about the garden areas at the front of the site and whether this could be an appealing space for relaxing given its proximity to the busy main road. However, certainly as an area of soft landscaping, this would help to soften the appearance of the site which is welcomed and in itself acceptable.

Similarly, in terms of the proposed amenity area at the rear of the site, given this would be site adjacent the parking areas there are concerns as to how this could form an attractive or enjoyable area that would not be compromised by vehicle movements. You are encouraged to maximise soft landscaping to promote quality areas of amenity space in this respect. You will need to provide landscape buffers between the communal areas and habitable room windows (positions not known at this stage) - to provide some 'defensible space'.

The lack of amenity space for some of the residential units, although not ideal, would be likely to be considered appropriate by officers in overall terms owing to the physical constraints of the site, the accessible location of the site and access to nearby public amenities including the nearby Oxford Road Community Garden. However, your future submission should include a specific section whereby you seek to justify this element of your proposals.

Further to the above, your submission makes comment on anti-social behavior at the site and that the redevelopment would remove asb as well as enhance the visual amenity of the area. It is likely that the Crime Prevention Design Advisor at Thames Valley Police would be consulted as part of any future planning application and you are strongly encouraged to engage separately with the CPDA prior to the submission of any application to discuss wider secure by design matters. Contact details are as follows:

Crime Prevention & Design Advisor
Berkshire | Neighbourhood Policing & Partnerships
Thames Valley Police
Tel. 01753 835472 / Mobile: 07800703324
Email: anne.chalmers@thamesvalley.pnn.police.uk

Environmental Protection

The following concerns would need to be addressed as part of any future planning application:

Noise impact on development

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas. The proposal site is located close to Oxford Road and the fairly busy Western Elms Avenue junction as well as in close proximity to the Lidl supermarket delivery yard.

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

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

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

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.

Internal noise criteria (taken from BS8233:2014)

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

Bin storage - pest proofing

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

Re-development of land - pest control

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

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

Air Quality

Policy WR3h requires that the location within an Air Quality Management Area is accounted for. Officers consider that the proposed development would not result in any worsening of the local air quality although measures to limit exposure to poor quality air may be required, such as locating ventilation air intakes to the rear of the building, or roof.

Contaminated Land

The proposed development lies on a site which has the potential to have caused contamination. A 'phase 1' desk study should be submitted with applications for developments on sites with potentially contamination to give an indication as to the likely risks and to determine whether further investigation is necessary.

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

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

Construction and demolition phases

As part of any future planning application a scheme would be required to be submitted which specifies the provisions to be made for the control of noise and dust emanating from the site during the demolition and construction phase.

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

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

Mix of units

Policy H2 of the Reading Borough Local Plan 2019 sets out that residential development should contribute towards providing the mix housing most needed within the Borough Figure 4.6 of the supporting text to Policy H2 (below) sets out that as per the Berkshire Strategic Housing Market Assessment the most need is for two- and three-bedroom units. In this respect the policy goes on to

state that, as a minimum, new developments for 10 or more dwellings outside the central area and other defined local centres will ensure that over 50% of dwellings are 3 bedroom or more, having regard to all other material considerations.

Figure 4.6: Estimated size of accommodation type required in Reading (Source: SHMA 2016)

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	10.3%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
Overall	18.6%	30.5%	36.5%	14.4%

As such, the current proposed mix of units would not comply with Policy H2, and significant justification would be required to justify the appropriateness of an alternative mix. In line with the comments raised above, a reduction in the number of units could allow you to explore providing options for larger accommodation in your emerging proposals which would be encouraged in principle and to comply with Policy.

Transport and Parking

Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development.

The site is located within the Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs.

The site comprises part of the rear curtilage of 311 and 313 Oxford Road. Proposed Site Plan 17 - J2212-SK-01 illustrates parking provision for No's 311 and 313; however, the submitted Design and Access Statement comments that "some of the garages are vacant". Any displaced existing parking i.e loss of garage parking including parking on areas of hard standing would need to be re-provided. A plan detailing the existing provision for the site would also be required so that the full extent of the impact of the loss of garage parking and hard standing parking could be determined.

Confirmation is required if the proposed provision for No's 311 and 313 are as a result of re provision for displaced parking following the demolition of the garages and hardstanding and that ownership of all the garages have been confirmed.

In accordance with the adopted Parking Standards and Design SPD, the proposed residential development would be required to provide parking provision of 1 parking space per 1 and 2 bedroom flat; therefore, equating to 15 spaces. Each standard parking space should measure 2.5m x 5m with a minimum forecourt depth of 6m to ensure vehicles can manoeuvre in and out of spaces unhindered. 1 visitor parking space per 10 dwellings would also need to be provided. Therefore, the total provision

for the proposed new dwellings would be 15. The site plan illustrates a total of 15 parking spaces and an additional 2 visitor parking spaces which exceeds the Council's standards.

It should be noted that recent changes to the Local Transport Plans State:

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Development should make the following 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.

Details of this would need to be provided if a full application is submitted.

Plans indicate that No's 311 and 313 Oxford Road would be provided with a garage and parking bays. The proposed garages would need to meet the dimensions as stated in the Revised Parking Standards and Design SPD, where it is recommended that the internal dimensions of single garage should be 7m long and 3m, wide to allow easy access to/from the vehicle and sufficient storage to the rear.

The development site is located within close proximity to roads that are part of the Council's CPZ where a resident's permit scheme operates. Under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area; therefore, if such an application is approved there should be an assumption that any future occupants of the proposed dwellings would not be issued with residents or visitor parking permits which would be covered by condition and an informative applied. This would 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.

There is an existing access running along the southern boundary of the site which provides access to the rear of other properties in Oxford Road (No's 303, 305 and 307). The submitted Design and Access statement states that these rights would be retained.

A new access from Western Elms Avenue is proposed to serve the parking areas and rear access for No's 311 and 313 Oxford Road. The access should be a minimum of 4.1m wide to allow movement of 2 way traffic in and out of the site. Visibility splays of 2.4m x 43m would be required to be illustrated on plans if a full application is submitted. Plans indicate that the existing access is to be retained and upgraded. Full details of the proposed upgrade to the access would be required if a full application is submitted. Licenses would also be required to undertake any work on the public highway, this includes the alterations and amendments of accesses.

There is a telegraph pole and speed humps located in front of the site, these should be illustrated on plans if a full application is submitted to ensure that there is no conflict with the access and cars entering and egressing the site.

It should be noted bin storage should not be located further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods and should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods. It is recommended that the Council's Refuse and Recycling Team are contacted to ensure the correct capacity of bins is provided for the development, also bearing in mind that very recently food waste bins have been introduced in the borough (in addition to general waste and recycling bin provisions).

In accordance with the Council's Revised Parking Standards and Design SPD, the development would be required to provide 0.5 cycle parking space per dwelling, this would equate to 8 spaces. These should be covered and secure; full details would be required if a full application is to be submitted.

The applicant is advised that a Demolition and Construction Method Statement would be required for this development.

Impact on Trees/Landscaping/Ecology

Policy CC7 (Design and the Public Realm) seeks that development should contribute positively to the area of Reading within which it is located, including by way of landscaping. Policy EN14 (Trees Hedges and Woodlands) states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal, and the Borough's vegetation cover will be extended with new development to make provision for tree planting within the application site, or off-site in appropriate situations. Policy EN12 (Biodiversity and the Green Network) states that development proposals should retain, protect and incorporate features of biodiversity.

As above, the site is located within the AQMA where tree planting and the retention of larger canopied trees is of great importance. Furthermore, this area of Reading is identified as having less than 10% tree cover in the Council's Tree Strategy. The Council therefore has a commitment to protect and enhance the tree coverage in this area and requires new development to make a positive and sustainable contribution to the area lacking tree cover.

Mature street trees on the western side of Western Elms Avenue and soft landscaping and hedging within the front gardens on both sides of the road also contribute to the green and leafy character of the Avenue. The proposals show indicative planting of 6 trees along the site frontage with green hedges running between them. This is considered a positive aspect that would enhance the appearance of the site and help to soften the proposed building. Any future application should provide detailed tree pit specifications to demonstrate suitability given the existing hard surfaced area with sufficient soil volume/tree species suitability.

Green hedges and smaller trees are also shown throughout the parking area to the rear. The Council's Tree Officer considers that given the space available it would be more appropriate to provide fewer larger canopy trees than multiple small or upright trees. Furthermore, it is recommended that the location of bike storage and parking spaces 12-15 are moved southward/relocated away from the TPO tree at 287/291 Oxford Road. In this respect you may wish to look at a revised layout; however, any

future application would seek tree protection details which could potentially be secured by way of condition.

Notwithstanding the above, and as referenced elsewhere in this report, the proposed building would be forward of the building line of this part of Western Elms Avenue. Whilst the 7m set back from the frontage site boundary is considered to provide just enough space for frontage planting, as above, a further set back of the building would also allow for more soft landscaping and possibly large growing trees which would be more in keeping with the leafy and green character of this part of Western Elms Avenue.

The Council's Tree Officer considers that proposed replacement planting would be a likely improvement on the existing vegetation/trees on the site. However, any future application should include a tree survey of all existing vegetation within the site or falling within a distance of 15m. Any existing, retained or trees to be removed should be plotted accurately and shown in relation to the proposal.

Areas of green roof and walls could also be incorporated in order to enhance the green credentials of the site and help to mitigate the long-term impact of climate change.

The Council's ecologist has not been consulted during this pre-application enquiry. However, the advice given under 181033 remains applicable; namely, that the site is surrounded by habitat of good suitability for use by foraging and commuting bats and reptiles (large connected gardens with trees, the Oxford Community Garden to the rear of the site and long trees lines 80m to the east of the site). According to previous history on the site, there are also records of slowworms nearby.

As per the validation requirements, and advice given under 181033, a phase 1 ecological survey would be required should a full planning application be forthcoming. In addition, to support the Council's climate emergency and policies, it would be appropriate to incorporate biodiversity enhancements such as bird and bat boxes built in to the building in line with Policy EN12.

Sustainability

Policies H5 (Standards for New Housing) seeks that all new building housing is built to high standards. In particular, new housing should meet water efficiency standards above building regulations, and zero carbon homes standards (for major schemes). Policy CC2 (Sustainable Design and Construction) and CC3 (Adaption to Climate Change) seeks that proposals should incorporate measures which take account of climate change.

A sustainability statement would be required to be submitted with any application. As part of this, it would need to be shown, most pertinently, that the proposals would achieve zero carbon homes standard (or if unachievable, a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and a financial contribution to offset remaining carbon emissions to zero), in line with Policy H5c. The Council's Sustainable Design and Construction SPD provides information as to the level and nature of information required at application stage and the process to follow in relation to this. Policy H5b also requires that all new

building housing is built to the higher water efficiency standard under Regulation 36(3) of Building Regulations and this should also be demonstrated as part of a sustainability statement.

An energy statement would also be required to be submitted (Policy CC4 - Decentralised Energy). Any development of more than 20 dwellings is required to consider the inclusion of decentralised energy provision. This will be expected within the site itself, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. There is also an expectation in developments of over 10 dwellings to link into an existing district energy network, where one is present within the vicinity of an application site or demonstrate why this is not feasible.

Please see the [December 2019 Sustainability SPD](#) for exact details of the level and nature of information required at application stage.

Sustainable Drainage Systems (SuDs)

In accordance with the part 1 validation requirements, all major developments are required to provide details of sustainable urban drainage. Policy EN18 (Flooding and sustainable drainage systems) requires that:

“All major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.”

Affordable Housing

The proposal seeks to create 14 new units. In line with Policy H3, applications for 10 or more dwellings shall provide 30% of the total dwellings in the form of affordable housing. Provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.

It is noted that a Viability Spreadsheet has been submitted, with the supporting letter indicating that the scheme would be unviable to provide any affordable housing - with no mention of onsite provision. However, there is a separate charge for the assessment of any viability submitted (this is an established requirement detailed on the pre-application form) and as discussed at our meeting, this spreadsheet has not been assessed by the Council’s Valuer at this stage.

You are advised that there is a strong expectation that a Policy compliant level of affordable housing is provided as part of this scheme. A failure to do so will could weigh heavily against the application given the identified need for such accommodation in the Borough. A full viability assessment would be needed in order to adequately justify any such departure from Policy. Such a viability appraisal would

need to be agreed in full prior to the consideration of any financial contribution in lieu, given the presumption in favour of on-site provision.

The policy goes on to set out that in cases where proposals fall short of the policy target for affordable housing then this would need to be evidenced by way of a detailed viability appraisal (the Council's recently adopted [Affordable Housing SPD](#) sets out what information is required to be provided as part of an appraisal). Any viability appraisal submitted would be subject to review by the Council's Valuer. The review process can be lengthy and subject to detailed negotiations and is subject to an additional fee as per the schedule table below:

Proposals	Initial Fixed Fees
1 unit	£1,500
1-4 units	£2,500
5-9 units	£4,000
10-14 units	£5,000
15-29 units	£8,000
30+ units	£10,000
Strategic/multiphase schemes	£15,000
If deferred to external consultants then their cost will be advised at the time of outsourcing.	

As already mentioned, there is a strong expectation that policy compliant levels of affordable housing should be provided, given the need for such accommodation in the borough. Should the Council's assessment of your viability submission indicate that affordable housing could be provided (set against a backdrop of any viability report stating it is not viable to do so), then officers would be unlikely to support the proposal on this basis. If the viability case is proven and accepted (either a nil provision or under policy compliant contribution), it is possible that a deferred mechanism to re-review viability at a later date would be secured, should the viability position improve in the intervening time. Please see the emerging affordable housing SPD for details on deferred mechanisms.

S106 Legal Agreement

Another implication of any major development being sought is that there will be a requirement for an employment, skills and training contribution. [The SPD on this topic](#) explains the background to the requirement and for this proposal (10+ residential units) the contribution would only relate to the construction phase (as per page 11 of the SPD).

The S106 Legal Agreement would also secure affordable housing too.

Community Infrastructure Levy

The majority of proposal would be CIL liable, at a charge of £156.71 per sqm of residential accommodation (2021 CIL rate - including indexation). Existing floor space can be off-set subject that it can be evidenced that this floor space has been in lawful use for a minimum continuous period of 6 months with the 3-year period prior to planning permission being granted. Please see the website for further details, including the approved charging schedule and guide for applicants available in full [via this link](#). At the time of your application you will also be required to submit existing / proposed floor plans marked up to demonstrate your methodology for your calculation of the existing/proposed floorspace figures included on your CIL form.

Procedural points

Submitting a valid application - Prior to the submission of any future application you are advised to consider the Council's validation checklist (available via the website), which provides details as to the level and nature of information required to validate an application. The determination period for the Council to consider your application will only begin once all the necessary information to validate the application has been received.

Wider consultation in advance of any submission - In line with section 4 of the National Planning Policy Framework, you are encouraged to engage with the local community prior to the submission of any application. Please detail in your submission what consultation you have undertaken with the local community.

As per the [Local Planning Authority validation requirements \(2016\)](#), the following information would be required for an application of the type proposed:

Part 1:

Mandatory national information requirements (Forms, Ownership certificates/declaration/ site plan, block plan, fee, CIL form and plans, Design and Access Statement)

Part 2:

- Item 1: Affordable Housing Statement
- Item 2: Air Quality Statement
- Item 4: Contaminated land
- Item 6: Ecological Survey & Report
- Item 7: Energy Statement
- Item 9: External Lighting Details (if proposed or required by the proposal)
- Item 11: Heads of Terms Proposal
- Item 13: Landscape Principles
- Item 14: Materials Details
- Item 15: Noise Assessment
- Item 16: Open Space Statement
- Item 17: Planning Statement
- Item 18: Plans and Drawings
 - i. In addition to the mandatory information, marked up floor plans to evidence the stated CIL floorspace figures (including existing) and or relevant exemption forms completed;
 - ii. Sections & Levels where there is a significant change in levels to the street;
- Item 20: Sustainability Statements
- Item 22: Transport Statement
- Item 23: Tree Survey
- Item 24: Utilities Statement

- Item 25: Vehicle (car & cycle) Parking and Servicing (including waste storage and collection) details
- Item 27: Viability Appraisal (if applicable)

Others:

- Policy H5 Statement

The above list is not exhaustive and you are advised to refer to the Council's validation checklist [here](#).

If the application submitted is 'major development' it would automatically be considered at the earliest Planning Application Committee (PAC) once a recommendation has been arrived at.

Conclusion

In conclusion, it is clear that any development of this site will be challenging and in light of the site's unique site circumstances and evident constraints, you should be under no illusions about the difficulties associated with developing this site. It is considered in overall terms that whilst there has been positive progress in some respects since the 2018 pre-application submission, particularly in respect of the overall design idiom, there remain strong concerns over the amount of development currently proposed - combined with the significant amount of hardstanding - and the need for more generous soft landscaping/amenity space. In this instance, the onus will be on you to seek to justify the proposals to officers, both in terms of a number of individual matters as above and in overall terms too.

It is noted that there is a potential conflict between transport officers requiring on-site parking spaces and the natural environment/planning officers specifying that outside amenity space/soft landscaping provision should be increased/improved. As discussed at our meeting, and given the sites accessible location, a car-free development could be supported in this instance. However, in instances where there are competing demands, it will ultimately be for the planning officer to weight these up as part of the overall planning balance as part of the determination of the application. This will be based on the proposals at application stage and the justification submitted in order to explain why one element may outweigh another. As is currently considered to be the case, the extent of the development and associated hardstanding is too much when all factors are taken into account. With the quantum of development reduced, as discussed, this would enable a more suitable overall development which, whilst might not provide suitable parking, would provide more appropriate space and soft landscaping. As it stands, and as discussed, the proposals currently represent an overdevelopment of the site.

It is hoped that the information discussed at the meeting and included within this report is of assistance to you.

Notwithstanding this, it is considered that other various matters of detail as above should be carefully considered in advance of any future submission and it should be noted that any planning application which is submitted will be assessed on its own planning merits.

This advice is given on a without-prejudice basis and not all policies have been considered. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. If you wish to discuss the contents of this letter, please contact me on the number given above.

Yours sincerely,

Ethne Humphreys

Ms Ethne Humphreys
Senior Planning Officer

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