

DELEGATED FULL APPLICATION REPORT

Ward: Tilehurst

App Ref: 200734/FUL

Address: 19 Ogmores Close, Reading, RG30 4SX

Proposals: Erection of a single dwelling with associated parking and amenity space

Case Officer: Mr James Overall

Date received (valid from): 5 June 2020

Target Decision Date: 31 July 2020

PROPOSAL AND SUPPORTING INFORMATION

Ogmores Close is a small close, which branches off Corwen Road. Ogmores Close, has a right-angle bend, and the application site is located on the north-east of this bend. As you enter Ogmores Close, there is a driveway which leads to six garages behind the properties of Bran Close, Corwen Road and Ogmores Close.

The application site is formed of residential garden land (extending to approximately 0.066ha), which belongs to No.19 Ogmores Close. 19 Ogmores Close has a larger garden than the majority of the properties in the surrounding area, due to being a corner plot.

The site itself lies within the Biodiversity Berks Opportunity Areas - West Reading Woodlands 50m buffer.

Nos. 7-19 on the northern side of Ogmores Close are pairs of semi-detached properties that are equally staggered and uniform in their appearance. Properties from Nos.21 onwards are a row of terraced houses. There is a considerable gap between the flanks of Nos. 19 and 21 Ogmores Close, which expose views into Blundells Copse to the rear (an ancient woodland and Local Wildlife Site).

Plan Type	Description	Drawing Number	Date Received
Location Plan		P0-01	1 Jun-20
Access Plan	Proposed	P1-02 Rev C	1 Jun-20
Site Plan	Proposed	P1-01 Rev D	1 Jun-20
Contextual Elevations	Proposed	P3-03 Rev B	1 Jun-20
Floor & Roof Plans	Proposed	P2-01 Rev C	1 Jun-20
Site Survey		DTS051218-8Y7	1 Jun-20
Site Sections	Proposed	P4-01 Rev B	18 Sep-20
Elevations	Proposed	P3-01 Rev D	10 Dec-20
Intensive Green Roof System Technical Summary		N/A	9 Oct-20
Green Roof Biodiversity Systems Maintenance		N/A	9 Oct-20
Extensive Substrate System Technical Summary		N/A	9 Oct-20
Substrate Systems - Extensive Green Roof System		N/A	9 Oct-20
Wildflower Blanket System Technical Summary		N/A	9 Oct-20

PLANNING HISTORY

Reference No.	Description	Outcome
10635/34842	79 houses 94 garages	Permitted on 5 July 1963
00/00307/FUL (991301)	Erection of 1 Dwelling (Attached to number 19)	Permitted on 31 May 2000
102063	Pre-application advice for new dwelling on land to the side of existing property	Advice given on 11 March 2011, which states that the proposal would be unacceptable due to its siting and impact upon the street scene.
190336	Pre-application advice for the development of site into 3 flats. One 2 bed flat and two 1 bed flats.	Advice given on 8 April 2019, which raised major concerns relating to character of the area, street scene, neighbouring amenity, trees, refuse and waste and accessibility.
191120	Erection of two dwellings with associated parking and amenity space	Refused on 20 December 2019

CONSULTATIONS

The following addresses were consulted by letter.

- 17 Ogmore Close
- 21 Ogmore Close
- 10b Bran Close
- Blundells Copse

No letters of representation have been received.

Transport

This application consists of the erection of a single 3 bedroom dwelling. The proposed development site is located on a corner plot adjacent to No19 Ogmore Close, to the rear of the site is Blundells Copse which is a wildlife heritage site, local nature reserve.

The site is located within Zone 3, secondary Core Area, but close to the borders of zone 2 of the Council's adopted Parking Standards and Design SPD. Typically these areas are within 400m of a Reading Buses high frequency 'Premier Route', which provides high quality bus routes to and from Reading town centre and other local centre facilities.

In accordance with the adopted Parking Standards and Design SPD the proposed new dwelling would require 2 off road parking spaces in addition to retaining existing provision for No19. Submitted site plan P1-01Rev D illustrates 2 parking spaces allocated to the new dwelling which is in accordance with the Councils current standards. Proposed access is a minimum of 4.1m and therefore is adequate to allow 2 vehicles to pass each other; There is a lamp column located adjacent to the access which has been illustrated on submitted plans a 1m distance is required between the access and lamp column, should any relocation be required would be met by the applicant.

The Council's Local Transport Plan 3 Strategy 2011 - 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. The Council's Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point; Therefore, this will need to be illustrated on revised plans, however this can be dealt with by way of condition if the application is approved.

The applicant should be advised that a license must be obtained from the Council's Highways section before any works are carried-out on any footway, carriageway, verge, or other land forming part of the public highway to agree the access construction details.

Details of the bin storage and collection point have been illustrated on a Site Plan P1-01 Rev D; 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. The collection point is deemed acceptable.

Cycle storage has been illustrated, cycle storage should be secure and conveniently located. In a development of this nature storage within a secure garden shed would be deemed acceptable. Submitted plans indicate a storage area for the new dwelling, provision is therefore deemed acceptable.

In principle Transport do not have any objections to this application subject to conditions.

Trees

19 Ogmore Close is located on the edge of Blundell's copse, a local nature reserve, a local wildlife site and a priority habitat (lowland mixed deciduous woodland).

The larger trees within the woodland are set back from the property but directly along the boundary there are approximately 10 younger Sycamore and Oak which have asymmetrical canopies having been suppressed and grown south towards the light in competition with the mature trees. These younger trees have the capacity to grow significantly broader and taller than they are today.

By scaling the plans back to one dwelling on site, the proposed layout allows for a reasonable gap between tree canopies and the new dwelling with an allowance for future growth. There will also be a reasonable useable garden area not under the canopies of the woodland trees. Thus, the application is considered to be acceptable (subject to conditions) and sustainable with regards to the adjacent tree cover.

It should be noted that these comments refer specifically to the individual growth of the trees, and not the woodland as a whole; which is an ecological consideration and will be addressed separately.

Environmental Protection

Construction and demolition phases

We commonly receive complaints about noise and dust caused by construction and demolition works, particularly working outside reasonable hours and about smoke from bonfires associated with the burning of waste on site of minor developments.

An informative relating to noisy construction is recommended.

Ecology

Ecology have provided multiple comments during the lifetime of the application, and the applicant has had the opportunity to overcome the concerns raised numerous times. The applicant has attempted to overcome the concerns and issues raised by Ecology. The full history of consultation comments can be found on our website, and Ecology will be covered in detail within the appraisal section of this report.

In summary, the Ecological officer considers that the proposed scheme would have adverse impact upon the priority woodland, Local Wildlife Site and Local Nature Reserve. As such the proposed development does not comply with Policies EN12 and EN14 of the Local Plan (2019), as well as Paragraphs 174 and 175 of the NPPF.

Equality Act 2010:

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

Relevant Planning Policy and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with policies in the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
CC2: SUSTAINABLE DESIGN AND CONSTRUCTION
CC3: ADAPTATION TO CLIMATE CHANGE
CC5: WASTE MINIMISATION AND STORAGE
CC7: DESIGN AND THE PUBLIC REALM
CC8: SAFEGUARDING AMENITY
CC9: SECURING INFRASTRUCTURE
H2: DENSITY AND MIX
H3: AFFORDABLE HOUSING
H5: STANDARDS FOR NEW HOUSING
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE
H11: DEVELOPMENT OF PRIVATE RESIDENTIAL GARDENS
TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING
EN12: BIODIVERSITY AND THE GREEN NETWORK
EN14: TREES, HEDGES AND WOODLAND
EN16: POLLUTION AND WATER RESOURCES

SPG/SPD

Revised Parking Standards and Design (2011)
Revised Sustainable Design and Construction (2011)
Revised S106 Planning Obligations (2013)
Affordable Housing (2013)
Tree Strategy for Reading (June 2010)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Assessment

A previous application (191120) was refused on the following grounds:

1. Excessive hardstanding, resulting in loss of open green space and buffer zone between Blundell's Copse and the nearby residential dwellings. Failure to comply with Policies CC7 and EN8 of the Local Plan (2019).
2. Site layout is incongruous and a harmful addition to the street due to the substantial increase in stagger. Detrimental impact upon the flow of the layout in the wider area. Failure to comply with Policy CC7 of the Local Plan (2019).
3. Overlooking of 21 Ogmores Close, and perceived overlooking towards the semi-detached properties to the south-west. Outlook of 19 Ogmores Close will also be significantly impacted to a harmful level. Failure to comply with Policy CC8 of the Local Plan (2019).
4. Unacceptable adverse impact upon Blundell's Copse, which is a 'priority habitat', a Local Wildlife Site and a Local Nature Reserve. Additional associated detrimental impact on the health and amenity value of the individual trees. Failure to comply with Policies EN12 and EN14 of the Local Plan (2019); as well as paragraph 174 of the NPPF.
5. Absence of a completed Section 106 Legal Agreement to secure an acceptable level of affordable housing. Failure to comply with Policy H3 of the Local Plan (2019), and the Council's Affordable Housing SPD (2013) and Section 106 Planning Obligations (2015).

This new proposal is for the erection of a detached property in the residential curtilage of No.19 Ogmores Close. The proposed building will measure 7.3 metres tall, 9.9 metres deep and 5.8 metres wide.

This new application has attempted to overcome the previous reasons for refusal in the following ways:

1. The bike store has been relocated, and the hardstanding has been pulled away from the curtilage.
2. No adjustment. A statement was submitted stating that there are other properties with an inconsistent stagger, and it is therefore not 'incongruous'. The setback also helps to reduce overlooking and provide sufficient vehicular turning space.
3. The development has been reduced to one dwelling, and one of the bedroom windows has been relocated to the side elevation, with the addition of a rooflight to the front. The window facing the semi-detached properties to the south-west would be obscured glazed.
4. A report from RPS has been provided detailing the applicant's argument with regard to Ecology. Additionally, an Arboricultural Implications Assessment and Method Statement from an independent Arboricultural Consultant has been provided, detailing the applicants argument with regard to arboriculture. Further to these reports, the roof is now proposed to be made from sedum and will contain a bat loft.
5. Paragraph 63 of the NPPF is stated to argue that affordable housing is not required in this instance, as the proposal is for minor development.

The main issues to be considered are:

- a) Design, appearance and impact upon the character of the area and the street scene
- b) Impact on neighbouring properties and amenity
- c) Ecology/Trees
- d) Other considerations

a) Design, appearance and impact upon the Character of the Area and the Street Scene

Policy CC7 states, "*All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located*".

The proposed materials are stated on the application to be as follows:

- Walls: Buff brick and plain tile hanging above
- Roof: Sedum
- Windows: White UPVc
- Doors: UPVc Composite
- Vehicular access & hard standing: Permeable block paving

The chosen materials appear to have been selected in order to match those of the surrounding properties. The sedum green roof, whilst not a feature utilised by other properties, is considered an important element for assisting with reducing the ecological impact of the proposal; and therefore, from a design and character perspective this is considered acceptable, given that the benefits outweigh the potential adverse impact upon the character of the area. As such with regards to the appearance and character of the proposed dwelling, the scheme is considered to comply with Policy CC7.

The proposed development is set a considerable distance behind the building line and will therefore not be particularly obvious from the street scene when approached from the entrance to Ogmores Close; however, this does not mean that it will be completely hidden.

It is important to ensure that proposals respect the character of the area, whether this be from a street scene perspective, or even an aerial perspective; and as such layout is an important factor when it comes to assessing applications, and this is supported by Policy CC7 of the Local Plan.

The existing plot is seen as a buffer zone of green space between Blundells Copse and the dwellinghouses, and the application site creates a substantial gap between two types of differently configured properties albeit of the same age and style; a staggering of pairs of semis to the south-west of the site followed by a row of terraced houses to the south-east. This gap is visible from the junction of Ogmores Close and Corwen Road and from the cul-de-sac end of the close. This gap is well placed as it breaks the continuity of housing as they wrap around the bend in the road. In addition to this the open nature of the site provides pleasant views into the woodland.

The proposal is considered to respect this, as it is setback a considerable distance from the neighbouring properties to the South-West and therefore does not upset the perceived gap between the properties, and still allows views through to Blundells Copse behind. However, the increased stagger does not flow with the rest of the houses to which the building is supposed to 'continue'; as it is over double that of the setback used within the staggered semis.

Whilst it is appreciated that the setback is to assist in alleviating the overlooking issues; the provision of the setback causes its own concerns and is considered incongruous.

As such this is considered to not be in compliance with Policy CC7, which includes assessing layout: urban structure and urban grain; continuity and enclosure; as well as the quality of the public realm and provision of green infrastructure and landscaping. It should also be noted that Policy EN8: Undesignated Open Space, states "*The quality of existing open space should not be eroded by insensitive development on adjoining land*".

The existing driveway for 19 Ogmores Close will be changed to provide a shared driveway to provide access to the new dwelling. This driveway will open up the corner of Ogmores Close a lot more than the existing situation and will allow views directly into the area proposed as driveway. Whilst at first this may seem ideal as it will allow better views across to Blundells

Copse, it also comes with the negative of covering existing green space with permeable block paving. The majority of the properties in the area, have both a small front garden as well as a driveway; and there are a couple of examples of properties having paved over their front gardens, however these properties only paved over a small front garden and therefore the amount of driveway - although doubled - remains small. The application site on the other hand, proposes to transform existing rear garden space into front driveway space for two new dwellings. This involves a considerable amount of permeable block paving and is considered to detract from the character of the area and the street scene due to the substantial amount of proposed driveway. Further to this, it will also result in the loss of existing green space, which is creating a natural buffer zone of green space between Blundells Copse and the dwellinghouses.

Whilst it is appreciated that an effort has been made by bringing the bike store and bins further down the site, allowing for slightly more of a lawned garden; it is considered that the extent of this alteration is not significant enough to overcome the previous first reason for refusal.

It is considered that this buffer zone will not be as effective with permeable block paving in place of existing green space; and as such is considered to not comply with Policies CC7 and EN8.

b) Impact on neighbouring properties and amenity

Policy CC8 seeks to ensure that new development will not cause a significant detrimental impact to the living environment of existing or new residential properties in terms of privacy and overlooking, access to sunlight and daylight visual dominance and overbearing among other things.

With the building being setback as far as it is, the occupants of 19 Ogmores Close will have a two-storey structure extending along the north-eastern boundary for about 40% of their boundary. Not only does this have a detrimental impact with regards to outlook for the occupants of 19 Ogmores Close, the bathroom room - although obscured glazed - would give the perception of overlooking, and this would have a detrimental impact upon the neighbouring property.

In addition to this, the front facing bedroom window would be overlooking the private rear amenity space of 21 Ogmores Close, due to their close proximity to the curtilage boundary. Whilst this view is not directly in front of the window, it is within the 45-degree viewing angle when measured from the middle of the window.

Whilst it is appreciated that measures have been taken to reduce the overlooking concerns raised within the previous application (191120), the measures are not enough, and overlooking is still considered would occur.

It is therefore considered that the proposal does not comply with Policy CC8 in terms of overlooking and outlook.

Space Standards

Room sizes should also be in line with the Council's Policy H4 and the Department for Communities and Local Government - Technical housing standards - nationally described space standards:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

Minimum gross internal floor areas and storage (m2)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

The property is shown to have a capacity of 5 persons in a 3-bed dwelling; and has a GIA of 93 square metres. This shows that the proposed development, whilst complying with the requirements; has been designed in such a way that it meets the bare minimum in terms of size/scale of the development. Whilst this is not the most ideal proposal in regard to the internal measurements, it would be considered acceptable from this perspective; and therefore, complies with Policy CC8 of the Local Plan (2019).

c) Ecology/Trees**Ecology**

The trees along the site boundary form part of Blundell's Copse, which is a Local Nature Reserve (LNR) a Local Wildlife Site (LWS) and the woodland (which is "Lowland mixed deciduous woodland") is a habitat of principal importance for the conservation of biodiversity in England as defined under Section 41 of the NERC Act (these habitats are referred to as "priority habitats" in the NPPF). The woodland is also within the West Reading Woodlands Biodiversity Opportunity Area (BOA). It is therefore of significant ecological importance particularly given the urban setting of the woodland.

The proposal is for a new detached house. The house would be in the garden of number 19. It will be 1.3m from the woodland canopy at its closest location and 6.7m at its furthest. The house will have a pitched roof and the plans show this as a green roof, of which the applicant has provided some details. The current single dwelling scheme is similar to the previously refused two dwelling scheme.

To support the current application a document titled, "*Ecology and Arboricultural Statement in support of Revised Application*" (RPS group - 21 Apr 2020) was submitted; and at the Council's request the applicant also provided sections through the building to the woodland edge. Additionally, some details of the green roof were provided and included standard Technical [sales] Sheets from Bauder for a "*seeded green roof solution*" and a "*wildflower blanket system*".

Natural England have written standing advice for local authorities for when assessing planning application close to ancient woodlands. Their advice is that development can have significant and adverse impacts on important woodland habitats and that a buffer zone of at least 15m should be retained around an ancient woodland.

Although Blundell's Copse is not listed on Natural England's ancient woodland inventory it is an established woodland of significant ecological value and as such the same principles apply.

The woodland at Blundell's Copse is an "irreplaceable habitat" as per paragraph 175c of the NPPF which reads:

"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (footnote 58 - For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and

hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat)”

The standing advice refers to the many potential impacts that a development can have, including those listed in the reasons for refusal of the previous application (191120) and it is therefore considered that the proposed development will have a significant and adverse impact on the woodland, Local Wildlife Site and Local Nature Reserve.

Reducing the amount of semi-natural habitats next to the woodland

An established garden is a semi natural habitat that provides an important buffer zone to the woodland. The new building will be 1.3m from the woodland edge, and although a green roof is proposed (it should be noted that the applicant has not provided any convincing evidence that a green roof would be successful - it will only receive limited sunlight for example) this would still be a significant area of new artificial habitat directly adjacent to the woodland. Furthermore, the proposals will result in the loss of two groups of trees, which although (according to the tree report) are of limited arboricultural merit, they are an important part of the buffer of semi natural habitat adjacent to the woodland.

The provision of the bat loft, which only appears to be referenced by a dotted box on the side/east elevation and the likelihood of such a small loft being used seems minimal. It should further be noted that the provision of this bat loft, will by no means compensate for the adverse impacts of the proposal.

Increasing the amount of built form adjacent to the woodland resulting in overshadowing

The proposed dwelling would be situated 1.3m from the woodland canopy (i.e. the woodland edge).

The site is orientated east/west and the woodland edge, including the garden, will therefore receive morning sunlight (despite the fence and particularly when the trees are not in leaf). The new development will result in an increase in shading adjacent to the woodland (i.e. the semi-natural garden habitat next to the woodland) and an increase in shading inside the woodland. Over the winter, when the sun is in the south, this shading will likely extend to the north.

This will have an adverse impact on the woodland, for example in spring before the trees have come into leaf, when the ground flora on the woodland floor grows. It will also change the microclimate and could affect other groups such as invertebrates.

As such this will be an adverse effect on the woodland habitat.

Increasing the amount of light and noise pollution

Due to the side windows facing towards the woodland, the proposed dwelling is considered to significantly increase light and noise into the woodland; in addition to this, the new owners may want to erect external lighting after purchase. As the resulting garden is smaller than the existing situation, any external lighting would be closer to the woodland. The owners may use the side of the house as an access to the rear for example and may want to install security lights. It would not be practical to place a condition restricting the use of artificial lighting as it would be very difficult to enforce. Furthermore, the council would not be able to restrict the use of the upper floors or their lights.

Lighting has been shown to have adverse impacts on many species, including bats, birds and invertebrates, and recent studies suggest that light pollution may be one of the causes behind

a very significant reduction in invertebrate abundance and diversity¹ over the last 20 years. As the adjacent woodland is likely to support these species the proposals will have an adverse impact upon them.

Similarly, in terms of noise, it is obvious that an additional dwelling and its occupiers will generate more noise than the existing situation.

This will therefore be an adverse effect on the woodland.

Increasing disturbance to wildlife

Whilst it is appreciated that a Construction Environmental Management Plan is suggested to be produced in order to limit the impact of the development on the woodland during construction; and the fact that there is a footpath running within it; this does not mean that the proposed scheme will not increase disturbance to the wildlife.

Given that the proposal is for a new dwelling, which will host a family of 5 persons, there will clearly be a result of increased human activity next to the woodland and consequently increased disturbance to the woodland and its wildlife.

This will therefore be an adverse effect on the woodland.

Increasing damaging activities like fly tipping

The proposed development will result in two dwellings with smaller gardens (both 19 Ogmore close and the new property) than the existing single dwelling with a reasonable sized garden. As such both properties will have less space to store materials, which therefore as a result increases the risk of fly tipping and other encroachment into the woodland.

There is therefore a very real risk that there will be an increase in fly tipping into the woodland if the development were approved, which would consequently adversely affect the woodland.

The introduction of non-native species from the garden

The Council has no way of controlling what people plant in their gardens. The garden at present is a lawn. It would be quite feasible for owners of the new house to plant a garden with non-native species and as this is a new house the developer could potentially employ a landscape company to plant a variety of non-native plants.

There is a risk that the development will result in an increase in non-native plants in the woodland, which would consequently have an adverse impact upon the woodland.

Ecological Summary

As set out above, the cumulative impact of the proposals will result in a significant and adverse impact upon the woodland. As such the proposals would be contrary to paragraphs 174 and 175 of the NPPF and policy EN12 which reads:

“The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that

¹ <https://www.sciencedirect.com/science/article/pii/S0006320719307797?via%3Dihub>

negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats [the adjacent woodland is all of these things], and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal)".

It would also be contrary to policy EN14 which reads:

"Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced".

It is therefore recommended that the fourth reason for refusal attached to the decision notice for the previous application (191120) has not been overcome and the application should be refused.

Trees

The consultation comments received from our arboriculture officer assessed the impact of the development upon the trees on an individual basis, and not the woodland as a whole, as the ecological assessment above has done.

Therefore, whilst the application maybe considered acceptable from an arboriculture perspective, as is clearly set out above, the application is not acceptable from an ecological perspective.

As such, the opinion remains that the application is contrary to Policy EN14 as set out above.

d) Other considerations

Transport

The application site is situated within Zone 3 - Areas within this zone feature a variety of land uses and densities and include some local centres for day-to-day needs. Typically, these areas are within 400m of a Reading Buses high frequency 'Premier Route', which provides high quality bus routes. These buses link not only to the Central Core Area, but also zone 2 areas and beyond to major supermarket and local centre facilities. Walking and cycling can play an important role in these areas.

The main bulk of the comments with regards to Transport can be viewed within the consultation section above; but to summarise, there are no transport concerns with the addition of appropriate conditions and informatives.

Affordable Housing

Policy H3 states that *"on sites of 1 - 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough"*.

The applicants planning statement comments on the fifth reason for refusal of the previous application (191120) and makes reference to paragraph 63 of the NPPF, stating that

affordable housing contributions are not appropriate in this case, as the proposal is for minor scale development.

There is a conflict between the national threshold relating to the provision of affordable housing in the Framework against the local thresholds set out in Policy H3. Reading Borough Council evidence a very high need for affordable housing in the Borough as well as challenging circumstances which justify our need for small sites to make contributions to affordable housing as an exception to national policy. Reading Borough Council have won a number of appeal decisions in the Borough which support this approach and therefore it is considered that paragraph 63 of the NPPF does not relate to this scheme, as there is an exceptional circumstance in the Borough of Reading.

Regardless of whether the applicant could be persuaded to enter into a Section 106 Legal Agreement, since this application is to be recommended for refusal based upon previously discussed Policy conflicts; a Section 106 has not been pursued and as such in the absence of a Section 106, an additional reason for refusal can be formed.

Conclusion

The development is considered to be detrimental with regards to its impact upon the character of the area, the street scene, neighbouring amenity and Blundells Copse. In addition to this, the application fails to provide a complete Section 106 for the purposes of providing affordable housing. The development would not comply with Policies CC7, CC8, EN8, EN12, EN14 and H3 of the Local Plan (2019) neither does it comply with the NPPF. As such the proposal is recommended for refusal.

Whilst it is appreciated that some of the reasons for refusal of the previous application (191120) have been taken into consideration; the revised scheme has not overcome these reasons for refusal to a sufficient or significant level; and therefore, it is considered that these reasons for refusal remain valid.

RECOMMENDATION:

Refuse