

DSD/lja/005/20

30th June 2020



TOWN PLANNING * DEVELOPMENT * ENVIRONMENTAL CONSULTANTS

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For the attention of Anthony Scholes

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Dear Sirs

Application No 200496
8 Riley Road, Tilehurst, Reading, RG30 4UX

We refer to the above planning application for the erection of 4 dwellings together with your email and our meeting of 12th June 2020.

A number of issues have been raised with the application and we would respond as follows: -

Trees

We attach a Tree Impact Assessment and Tree Protection Method Statement prepared by B J Unwin Forestry Consultancy following comments from the Council's Tree officer. The report concludes that: -

“The proposed redevelopment of No. 8 Riley Road require no tree removal or pruning and only removal of 8m of privet hedge.

Trees and shrubs and hedges can be protected by careful construction detailed in section 6 of this report: mainly protection fencing.

Tree and shrub planting is required as part of this proposal.”

Accordingly, in view of the above, there can be no objection to the proposed development based on impact on trees. With regards the hedge, it would be pruned back in any event.



Bats

As you are aware bat surveys were being undertaken and we now enclose a copy of the final Bat Survey Report prepared by Johns Associates. It concludes that: -

“No bats were observed emerging or re-entering the PRFs identified on the building. There is a confirmed roost present based on the evidence recorded inside the roof void: a likely brown long-eared bat occasional day roost for up to 5 bats within the roof void of the main building. The site is of negligible to low value for foraging and commuting bats, however the woodland edge habitat located adjacent to the eastern boundary of the site provides moderate value foraging and commuting habitat.

Lousehill Copse LWS which is part of the West Reading Woodlands LNR is located adjacent to the eastern boundary of the proposed site. The deciduous woodland and wet woodland habitat provide moderate quality foraging and commuting habitat for bats.”

In terms of the impact, it is considered to be of a local level and adequate mitigation can be provided as outlined in the report. In any event, a licence would be required from Natural England should bats be present. Accordingly, there are no objections to the proposal based on the impact on protected species i.e. bats.

Viability

Discussions have taken place with the Council's Viability Officer, John Kulasek. He has accepted all of the cost base on the submitted spreadsheet. The position is that agreement has been reached in that there will be no Section 106 contributions, unless back end profit goes over 15% GDV above which sales income would be split 50/50 with the Council capped at the complaint sum.

Accordingly, there are no objections to the proposals based on viability of the scheme.

Highways

We are still awaiting highway and transportation comments. However, the Transport Statement submitted in support of the application concludes that there are no transport objections to the proposed development based on parking, access, traffic generation or sustainability.

Impact on Lousehill Copse

Objections have been lodged in respect of the potential impact of the proposed development on the Lousehill Copse. Unfortunately, the issue of what harm has not been clarified by the Council's ecology officer. It may be that he has not managed to visit the site due to Covid-19. We have included a photograph which shows the distance between the rear boundary and the Copse. There is a considerable distance between the site and the tree belt in the Copse. The simple fact that development may be close to the Lousehill Copse is not in itself an issue which should result in an objection in principle. We would therefore require clarification on what harm is actually caused by the proposed development. We have provided a copy of the appeal decision for the erection of 5 dwellings including parking, access and landscaping at 4 Riley Road. The inspector clearly did not conclude that these proposals would have any adverse harm on Lousehill Copse (see paragraph 8 of the appeal decision (already provided)). The arrangement of the proposed dwellings will provide rear gardens against the copse area as was the case on the appeal decision.



Furthermore, the applicant's retained ecologist has considered the issue and been instrumental on the design of the proposed development. They do not consider that the proposed development would cause any harm to the character or integrity of Lousehill Copse.

Design

We note the comments about design which we considered to be totally unfounded. The area is firstly, not within any Conservation Area or Area of Townscape Character in any adopted or emerging Local Plan or Supplementary Planning Guidance. The existing dwelling forms part of an estate constructed circa 1950s with later additions. Dwellings in the main are 2 storey, comprising a mixture of detached, semi detached, link detached and terraced properties. Materials vary from render to brick and tile hanging. There are also a variety of doors, window types, designs and materials. This is an area which has a wide range of 2 storey residential properties as would be expected in such a suburban location. The proposals are for 2 storey residential properties. The Planning Authority have considered them to be terraced (akin to Delaney Close) but they could equally be two pairs of semi-detached dwellings. The proposals fully comply with all of the Council's standards in respect of amenity space, overlooking, parking etc. It is unclear why the Council consider that these proposals would affect the character and appearance of the area. As stated above, such objections are extremely ill founded and lack any credibility.

Open Land

The Council has raised an objection to the loss of the area of open land as part of the proposals and concluded it an important area of undesignated open space.

We question the Council's opinion that this area is an important area of undesignated open space. Firstly, the land is not shown with any designation on the proposals map of the adopted Local Plan. Furthermore, the land is not within a Conservation Area or the setting of heritage assets. It would appear that the Council's assumption is based purely on comments made by local residents.

With regards the area of land, we would comment as follows: -

- i. The proposals map does not identify it to be special or have any local amenity value.
- ii. The site does not have any significance to its biodiversity heritage significance or local amenity value.
- iii. There is a sign erected by the Council which prohibits ball games on the land. Even the Council do not consider it has recreational value.
- iv. The land is not used by local residents for recreational use.
- v. There are no public rights of way in the area.
- vi. A 2m footpath is being retained.
- vii. There is more than adequate land in the vicinity for recreational use.

The Council has confirmed that they no longer require the land for highway purposes. They clearly also concluded that they did not want it for residential purposes either. Furthermore, the land is owned by the Crown Estate and the applicant has agreed a price to purchase the land.

The NPPF states that planning policies should make an effective use of land in meeting the need for houses and other uses. In addition, the NPPF indicates that small and medium sized sites make an important contribution to meeting the housing requirement in an area. This is

particularly the case in this area where the Local Plan does not identify any strategic sites and so must rely on smaller sites. Furthermore, only today has the Prime Minister emphasised the need for the country to commence building again in order to come out of the recession caused by Covid-19.

Accordingly, part of the site is not an important area of open space for the reasons set out above.

Conclusions

We believe, we have addressed all of the issues raised by the Council. It is apparent that the proposed development makes effective and efficient use of land within the urban area. The proposals would assist to meet ongoing housing needs in the area without causing any detrimental impacts. We would therefore request that planning permission be granted. We would advise that should the Council decide to refuse planning permission then an appeal would be submitted and an award of costs sought against the Council.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'D2 Planning', written over a horizontal line.

D2 Planning Limited

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