

Planning Statement

**389 Gosbrook Road, Reading,
RG4 8ED**

Prepared For
Blue Infinity SSAS Pension

9519/RJ
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bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 This Planning Statement is written in support of a planning application submitted to Reading Borough Council (the Council) in respect of 389 Gosbrook Road, Reading (the Site) on behalf of Blue Infinity SSAS Pension (the Applicant), seeking planning permission for the following development:

“Demolition of existing building and erection of new building containing 1 x 2 bed flat and 5 x 1 bed flats with associated car parking and landscaping.” (the Proposal)

- 1.2 Pre-application advice on the Proposal was provided by the Council on 14 October 2020 (reference: 201097/PREAPP). The Proposal has been amended in response to that advice and this is referenced within this Statement.
- 1.3 The plans and supporting reports included in this submission are those requested by the Council in the pre-application advice. They demonstrate how the Proposal can be supported both in terms of the principle of the redevelopment of the Site for residential purposes and compliance with the key technical considerations.
- 1.4 In addition to this Planning Statement, prepared by Bell Cornwell, the submission comprises the following:

- Application plans, prepared by OB Architecture:
 - Location & Block Plan 298-OBA-00-ZZ-DR-A-0100
 - Existing Site Plan 298-OBA-00-ZZ-DR-A-0101
 - Proposed Site Plan 298-OBA-00-ZZ-DR-A-0102
 - Existing Building Plan 298-OBA-00-GF-DR-A-0200
 - Proposed Foundation GA Plan 298-OBA-00-B1-DR-A-0250
 - Proposed Ground Floor GA Plan 298-OBA-00-GF-DR-A-0251
 - Proposed First Floor GA Plan 298-OBA-00-01-DR-A-0252
 - Proposed Second Floor GA Plan 298-OBA-00-01-DR-A-0253



- Proposed Building Section 298-OBA-00-ZZ-DR-A-0350
 - Proposed Building Section 298-OBA-00-ZZ-DR-A-0351
 - Proposed Building Section 298-OBA-00-ZZ-DR-A-0352
 - Existing East Elevation 298-OBA-00-ZZ-DR-A-0400
 - Existing South Elevation 298-OBA-00-ZZ-DR-A-0401
 - Existing North Elevation 298-OBA-00-ZZ-DR-A-0402
 - Existing West Elevation 298-OBA-00-ZZ-DR-A-0403
 - Proposed Gosbrook Road Street Elevation 298-OBA-00-ZZ-DR-A-0400 E01
 - Proposed Send Road Street Elevation 298-OBA-00-ZZ-DR-A-0401 E02
 - Proposed South Street Elevation 298-OBA-00-ZZ-DR-A-0402 E03
 - Proposed North Elevation 298-OBA-00-ZZ-DR-A-0402 E01
 - Proposed South Elevation 298-OBA-00-ZZ-DR-A-0412 E03
 - Proposed East Elevation 298-OBA-00-ZZ-DR-A-0413 E04
 - Proposed Perspectives 0500, 0501, 0502, 0503
 - Indicative Planning Details 298-OBA-ZZ-XX-DR-A-0701
 - Indicative Planning Details 298-OBA-ZZ-XX-DR-A-0702
 - Materials, Appearance and Landscaping 298-OBA-A-0802
- Design & Access Statement, prepared by OB Architecture
 - Built Heritage Statement, prepared by RPS
 - Hard and Soft Landscaping Plan, prepared by Arc
 - Landscape Masterplan, prepared by Arc



- Landscape Strategy, prepared by Arc
- Flood Risk Assessment and SUDS Strategy, prepared by Ark
- Sequential Test Assessment, prepared by Ark
- Air Quality Assessment, prepared by Stantec
- Phase 1 Contamination Assessment, prepared by Stantec
- Transport Statement, prepared by Connect
- Ecological Assessment, prepared by Ecology Coop
- Tree Survey Report and Plan, prepared by ACD
- Tree Protection Plan, prepared by ACD
- Arboricultural Impact Assessment and Method Statement, prepared by ACD
- Sustainability Statement, prepared by Blewburton



2 BACKGROUND

SITE & SURROUNDINGS

- 2.1 The Site is currently occupied by a vacant building which was formerly in use as offices and a paint workshop. It is located on a corner plot where Gosbrook Road meets Send Road. The main frontage of the Site faces Gosbrook Road. There is a secondary vehicle access from Send Road.
- 2.2 The existing building is an amalgamation of dated commercial structures that are no longer fit for purpose and contribute nothing positive to the character of the area. The remainder of the Site is covered in hard surfacing except for one tree on the front corner of the Site.
- 2.3 The adjacent Grade II listed building to the east of the site is known as Ivy Farm House. It is described in the listing details as a late 18th Century building casing a 17th Century building, which was listed in 1957. The detail of this building and the relationship to the Site is described in more detail in the accompanying Built Heritage Statement.
- 2.4 The existing building on the Site currently detracts from the setting of the adjacent listed building. The accompanying Built Heritage Statement confirms that it is of no heritage value. The Council's pre-application advice also concluded that the building proposed to be demolished is not considered to be of any architectural merit to warrant retention in itself.
- 2.5 On the opposite side of Send Road, to the west, is a relatively modern three storey block of flats with an adjacent car parking area accessed via Send Road. To the south is another commercial site, which was the subject of an application for redevelopment for 16 flats (reference: 190980). That application was withdrawn in March 2020.

PLANNING HISTORY

- 2.6 The planning history on the Council's website indicates two main relevant previous proposals for the Site, which are summarised below.

01/01013/FUL – Appeal Allowed – 24 January 2003

- 2.7 Planning permission was granted at appeal in 2003 for 5 flats (4 x 1 bed and 1 x 2 bed) with 5 car parking spaces. The main issues for consideration in the appeal were the impact on the adjacent listed building, Ivy Farm House, and flood risk.



- 2.8 The Inspector concluded that it was appropriate for the proposed building to be larger than the adjacent listed building because it reflected the form and arrangement of a sizable farm building that might have previously stood on the Site. That proposal was seen to enhance the setting of the listed building considering the harm caused by the existing building on the Site.
- 2.9 With regard to flooding, the Inspector commented on the reduced footprint, raised levels and absence of any recorded flood events as being sufficient evidence that the proposal could be supported without unacceptable risk.
- 2.10 The Inspector commented on the rate of flooding, stating that “given the considerable distance from the river and all known and particularly recent experience, levels would rise gradually, and flow rates would be comparatively slow. In combination, this suggests that the residents of the flats would not often be put at risk of flooding and that, when they are, there would be very considerable notice (and thus opportunity to leave on a dry route)”.

06/01129/FUL – Application Refused – 13 February 2009

- 2.11 Planning permission was refused for 6 x 1 bed flats and 6 car parking spaces. The reasons for refusal related to inadequate information submitted to demonstrate there would be no additional flood risk, inadequate information regarding risk of pollution to controlled waters, insufficient information relating to sustainable design and construction and absence of a contribution towards leisure facilities.
- 2.12 With both of these proposals, the principle of the loss of the existing use and the construction of residential development on the Site was fully supported. The relationship with the adjacent listed building was also accepted in both cases. The 2009 decision was largely negative because of inadequate information being provided on technical matters.
- 2.13 Whilst both of these decisions are now several years old, they show the length of time that this Site has been considered to have development potential. The principles established in those decisions are still of relevance to the assessment of the current Proposal.



3 PLANNING APPRAISAL & RESPONSE TO PRE-APPLICATION ADVICE

THE DEVELOPMENT PLAN

- 3.1 The current Reading Borough Local Plan was adopted in November 2019. This provides the key policies against which the Proposal should be assessed.
- 3.2 On the Proposals Map the Site is not subject to any specific allocations. It is identified within an Air Quality Management Area. There is a cycle route running along Gosbrook Road and Send Road past the frontages of the Site.

PRINCIPLE OF LOSS OF EMPLOYMENT USE

- 3.3 As is set out in the planning history above, the Council has not previously raised any issue about the loss of the former employment use from the Site. In particular, they were keen to see the existing building replaced with something that would enhance the setting of the adjacent listed building.
- 3.4 The Site is not identified as a designated employment site. The main policy for consideration regarding the loss of the existing use is Policy EM3. This has a number of criteria that need to be considered when the loss of employment land outside of the Core Employment Areas is considered.
- 3.5 The response to each of the criteria, which is set out below, was also submitted to the Council as part of the pre-application submission.
- 3.6 The policy advises that the following matters will be considered when assessing proposals which would result in a loss of employment land, each of which is considered in turn below.

Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?

- 3.7 The Site is located to the north east side of Reading, on a high frequency bus corridor and within walking distance of a range of shops, services and other facilities. On that basis alone, the location could be considered equally appropriate for residential and commercial uses.
- 3.8 However, it is not a site that is suitable for a commercial use that relies on deliveries or servicing by large vehicles. That situation will not change in the future.



Is the continued use of the site or redevelopment for employment uses viable?

- 3.9 The Site has been vacant for some time and has had periods of vacancy over the years which has led to the previous proposals for residential development. The existing buildings have reached the end of their useful life, are in a poor state of repair and the investment required to redevelop the Site for commercial purposes is not a viable proposition. The time has now come for the Site to finally achieve a beneficial redevelopment for residential purposes.

Is there a surplus of a similar size and type of accommodation in Reading?

- 3.10 The Council's employment land studies show that there is an ongoing surplus of commercial uses in the area. This is the case despite the government introducing various permitted development allowances for changes of use and redevelopment of such premises. The surplus of employment land is only likely to have been exacerbated further by the impacts of the coronavirus pandemic.
- 3.11 In this case, the complete redevelopment of the Site for residential purposes is the most beneficial way to see the Site given a long term future which will enhance the character and appearance of the area.

Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

- 3.12 The Site is located in an area that is predominantly residential in character. The remaining commercial uses on surrounding sites are all somewhat dated and tired in appearance. Whilst some of them do continue to meet a need for low cost low profile commercial uses, this does detract from the character and appearance of the residential area.
- 3.13 Most importantly, the use detracts from the setting of the adjacent listed building. A new commercial development on the Site is only likely to continue that harm. Such uses would be better located in an area focussed on commercial uses where the visual appearance of the Site would be more appropriate.

Is the need for alternative uses stronger than the need to retain the employment land?

- 3.14 The Council currently have an unmet and continuing need for residential development and a surplus of employment land. Given the negative impact that the current development on the Site has on the character and appearance of the area, the opportunity to secure a high quality long term solution of a residential development on the Site should be welcomed.



Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

- 3.15 The Proposal has been designed in such a way that it would not prejudice the potential for the adjacent site to the south to come forward for development should an alternative scheme to the recently withdrawn application be submitted. Whilst a comprehensive scheme cannot be proposed here, the future potential for this to be achieved is not prejudiced by the Proposal. In addition, the adjacent property at 2 Send Road is already in residential use.
- 3.16 Policy EM3's supporting text recognises the need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations. It is not appropriate to simply apply a blanket protection to all existing employment areas.
- 3.17 On balance, taking into account the criteria set out in the policy, this is a site where an alternative future reuse is the most appropriate way forward. There would, therefore, be no conflict with Policy EM3 for the existing employment use to be lost from the site.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

- 3.18 The planning history provided in this Statement confirms that the principle of residential development has previously been accepted on this site in a similar form to that now proposed.
- 3.19 The Council's pre-application advice confirmed that, on the basis of the loss of employment use being accepted, the principle of wholly residential use at the Site would align with the broad objectives of Policy H1 by contributing to meeting the housing needs within the Borough.

FLOODING

- 3.20 It is recognised that development opportunities in Reading Borough are generally constrained by the tight boundaries of the Council area and environmental restrictions such as areas of flood risk. Policy EN18, in line with national guidance in the NPPF and PPG, seeks to direct development to areas at lowest risk of flooding in the first instance.
- 3.21 The policy sets out that where development in areas at risk of flooding is necessary, it must not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site. All new developments in areas of flood risk should give priority to SUDS.



3.22 According to the flood maps for planning, the Site is located within Flood Zone 3. A detailed assessment has been carried out by a flood risk specialist and they have undertaken pre-application discussions with the Environment Agency to find a solution to enable the Site to be developed. The Environment Agency provided advice on a number of options that were being considered by the Applicant and the final scheme has been designed in accordance with that advice.

3.23 The accompanying Flood Risk Assessment (FRA) and SUDS Strategy for Planning sets out the process that has been followed and the design solution adopted in the proposed plans. It concludes:

“Based on the likely flooding risk and small scale of the proposed development, it is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere, in fact reducing flood risk overall; it is therefore considered appropriate development in accordance with the NPPF/PPG.”

3.24 The Sequential and Exception Tests, that are required to be met are covered in a separate report with the application. That report concludes that it is considered that the scheme could pass the Sequential Test based on the fact that the development needs cannot be accommodated on sequentially preferable sites, the Local Plan’s identified need for housing and the wider sustainability credentials of the scheme. This is supported by Reading’s own Local Plan and Sequential Test report and the exhaustive assessment of all sites as part of this sequential test assessment for this particular site. The site can also be greatly improved in flood risk terms and reduce flood risk in the area. The separate site-specific FRA concludes that the scheme can pass the Exception Test.

3.25 The reports submitted with the application fully address the comments provided in the Council’s pre-application advice relating to flood risk and the associated tests to be passed. The application can be supported on this basis.

CONTAMINATED LAND

3.26 As identified in the pre-application advice, the proposed development lies on a site where previous uses had the potential to have caused contamination. To accord with the contamination requirements of Policy EN16, a phase 1 desk study has been prepared.



- 3.27 This advises that a number of potential sources of contamination have been identified from both on-site and offsite sources, associated with historical and current land uses, in particular the recent use of the site by a paint services company. Overall, the potential for contamination to be present on site is assessed to be to Low or Very Low associated with the possibility of historical leaks and spills from on and offsite processes and activities.
- 3.28 A ground investigation will be required to establish the extent of any contamination (if present) and identify potential remediation and/or mitigation measures. Given the relatively low level of risk it is anticipated that any requirement to carry out Phase 2 geoenvironmental intrusive investigations can be satisfactorily dealt with by incorporation of a suitable condition in any granted Planning Consent.

AIR QUALITY

- 3.29 The Site is within an Air Quality Management Area. It will be necessary for an Air Quality Assessment to be carried out and any mitigation measures incorporated into the design of the scheme to demonstrate compliance with Policy EN15.
- 3.30 The required assessment had not been carried out at the pre-application stage. However, it has now been undertaken. The appointed consultant liaised directly with senior Reading Council EHO Ross Jarvis, to seek clarification on the scope of work for the assessment following the pre-application advice. The response received was that “due to the scale of the development I would be happy for you to carry out the suggested extrapolation of baseline air quality/screening assessment for this development rather than a dispersion modelling as asked for in the pre-app response.”
- 3.31 The submitted report advises that there has been a decline in measured NO₂ levels over the past five years during which annual mean NO₂ levels have dropped to below the objective.
- 3.32 The demolition and construction work have the potential to create dust and, as such, a package of mitigation measures is recommended to minimise the risk of elevated PM₁₀ concentrations and dust nuisance in the surrounding area. With mitigation in place the demolition and construction impacts are judged as ‘not significant’.
- 3.33 The effect of road traffic associated with the proposed development is considered to be ‘not significant’.



- 3.34 Additional mitigation is not considered to be required and the Site is considered suitable for the proposed residential development in accordance with the requirements of the NPPF, and relevant local and national guidance regarding air quality.

NOISE

- 3.35 The pre-application advice identifies that noise levels will need to be assessed within the development given the proximity to the noise source of Gosbrook Road. Policies CC8 and EN16 require developments not to cause unacceptable living conditions for new residential properties in terms of noise and disturbance without adequate mitigation.
- 3.36 The pre-application advice identified the noise levels which the development will need to achieve internally and externally. Given the ongoing lockdown situation due to the pandemic and distorted traffic levels, it has not been possible to carry out the necessary surveys to confirm the existing situation and propose any mitigation measures.
- 3.37 However, given the location of the site, it is not anticipated that any required mitigation measures would be insurmountable or material to the design of the scheme. It is considered that the required surveys and specification required could be secured by way of a condition on the planning permission. We trust this approach is acceptable in the circumstances.

HERITAGE

- 3.38 Policy EN6 requires new development to make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.
- 3.39 This extract from the supporting text to Policy EN6 is important to consider and respond to:

“New development in the vicinity of historic assets or at the edges of conservation areas should be sympathetic. It should reflect elements of the local historic environment in the form of the new development. This could include a wide range of matters such as footprint sizes, setbacks from the road frontage, landscaping, window placement and size, prevailing building height or architectural features. The aim is not to copy existing heritage, but to use new development to underline key consistent elements of the local historic environment. Good, modern design that is complimentary to the historic environment will be acceptable and preferable to ‘pastiche.’”



- 3.40 The heritage impacts of the proposal were assessed in detail by the Design Review Panel and the Council's design adviser at the pre-application stage. The proposals were favourably received with minor adjustments recommended to further enhance the proposals. The Applicant's response to the pre-application advice is explained in detail in the accompanying Built Heritage Statement.
- 3.41 The Built Heritage Statement also provides a Statement of Significance and assesses the Proposal against the impact on the adjacent listed building. It concludes that the Proposal will cause an aggregate minor enhancement to the significance of Ivy Farm House and the legibility of that significance. As such, in regard to built heritage matters, the application can be consented.

DESIGN & LAYOUT

- 3.42 The Proposal was assessed in detail at the pre-application stage by the Council's Design Review Panel and design adviser. The feedback was very positive overall, with some matters of finer detail identified as opportunities to further improve the scheme. As a result there has not been a need to make significant change to the design and layout of the scheme but the feedback has been adopted into the final plans.
- 3.43 The design and layout have taken into account the existing buildings on neighbouring sites and the need to ensure that the future development of the land to the south is not prejudiced by the development of the Site. The adjacent listed building and the overall character of the surrounding area have also informed the evolution of the Proposal.
- 3.44 The footprint of the proposed building is around 40% smaller than the existing building on the Site, allowing space for an attractive landscaping scheme to complement the setting of the new building.
- 3.45 Pest proof bin storage will be provided within the development in an enclosed secure area.
- 3.46 The Proposal presents the opportunity to achieve a significant enhancement to the character and appearance of the Site and its surroundings.
- 3.47 The approach to the design and layout of the scheme is described in more detail in the accompanying Design and Access Statement. That document explains how the proposal has



been refined in response to advice received at pre-application stage to ensure that all opportunities have been taken to enhance the design.

IMPACT ON NEIGHBOURING PROPERTIES

- 3.48 Policy CC8 seeks to ensure development does not cause harm to the living environment of existing properties, in terms of loss of privacy, overlooking or visual dominance, amongst other things.
- 3.49 Policy EN16 deals with the impact of pollution more generally. The impact of existing noise on the future residents of the development has been dealt with above. The impact of the new development on existing residents also falls to be considered under that policy.
- 3.50 The pre-application advice confirmed that the Proposal is considered unlikely to result in any material loss of light or overbearing impact to the occupiers of this property. It was considered that the first floor window that was proposed on the flank elevation facing Ivy House, serving a stairwell, could be obscurely glazed to prevent any material loss of privacy.
- 3.51 In the final submitted design, that first floor window in the east elevation has been removed. There are two skylights proposed at second floor level facing eastwards which would not give any scope for overlooking.
- 3.52 In relation to No 2 Send Road to the south, whilst the increase in height from single storey to two and half storeys would clearly be visible to the occupiers of this property, given the distance involved (and the reduction in built form closest to the common boundary), the Proposal is unlikely to result in any material overbearing effects. Similarly, given the distance and that the upper floor windows would face across the front of the properties along Send Road, there is unlikely to be any significant material loss of privacy.
- 3.53 The loss of the existing use is likely to be beneficial to the amenity of neighbouring occupiers and will secure the removal of the existing use which has previously been a source of noise and disturbance. The objectives of Policies CC8 and EN16 are, therefore, met by the Proposal.

SPACE STANDARDS & HOUSING MIX

- 3.54 It is noted that Policy H2 seeks to secure an appropriate density of residential development taking into account a range of factors. The pre-application advice encouraged us to consider whether any larger 2 or 3 bed units could be accommodated on the site.



- 3.55 The size of the units has been revisited and increased where possible to ensure that the scheme is optimised for the site. It has not been possible to increase the number of bedrooms within each unit. However, by redesigning the floorplan layout and stairwell location, the mix has been improved to increase two of the units from 1 bed 1 person to 1 bed 2 person units as is set out in the table below:

Unit No.	Pre-App Unit Type	Planning Application Unit Type
1	1b 1p	1b 2p
2	1b 2p	1b 2p
3	1b 1p	1b 2p
4	2b 3p	2b 3p
5	1b 1p	1b 1p
6	1b 1p	1b 1p

- 3.56 The Proposal delivers a high quality scheme that fits in with the character and appearance of the area and achieves a beneficial re-use of the Site. The proposed 6 flats in a mix of 1 and 2 bedroom units is an entirely appropriate development for the Site in line with Policy H2.

AMENITY SPACE

- 3.57 Policy H10 is not prescriptive on private amenity space requirements. The Proposal offers a mixture of private balconies and ground level communal amenity space available to all residents.
- 3.58 A comprehensive landscaping scheme is submitted with the proposal to demonstrate the quality and usability of the space proposed, including ensuring that clear delineation is provided between shared surfaces and areas dedicated for pedestrians.
- 3.59 The provision made is entirely appropriate for the type of development and location, particularly given the ease of access to a range of large areas of public open space, such as Christchurch Meadow, King's Meadow and Westfield Road.

CONSTRUCTION STANDARDS

- 3.60 Policy H5 sets out a number of criteria for schemes to meet in terms of construction standards. The pre-application advice recommended that we show how each of those criteria in turn has been satisfied by the Proposal.



a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard

3.61 The proposal comprises the following mix and size of units, in full accordance with the standards:

Unit No.	Unit Type	Required Internal Space Standard	Proposed Internal Space
1	1b 2p	50	54.34 sq.m.
2	1b 2p	50	55.50 sq.m.
3	1b 2p	50	51.26 sq.m.
4	2b 3p	61	64.80 sq.m.
5	1b 1p	39	40.71 sq.m.
6	1b 1p	39	40.42 sq.m.

b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations

3.62 The Sustainability Statement submitted with the application confirms that the proposed development will meet the required water efficiency requirements.

c. All major new-build residential development should be designed to achieve zero carbon homes

d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations

3.63 As this is not a major scheme, criterion c. does not apply. An explanation of how the building will contribute towards meeting carbon reduction targets in line with criterion d. is provided in the Sustainability Statement.

3.64 The Sustainability Statement confirms that the proposed dwellings are projected to achieve a 20.49% uplift over minimum Part L1A compliance, in exceedance of the 19% uplift required by Policy H5.

e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below)

3.65 The building has been designed to provide the potential for units 1 and 2 on the ground floor to be Part M2(2) units, whereby they can easily be adapted to suit the requirements of a wheelchair user.



f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.

3.66 This criterion does not apply.

3.67 Taking into account all of the above considerations, the requirements of Policy H5 are met by the Proposal.

CAR & CYCLE PARKING

3.68 Policy TR5 sets out the Council's policy on car and cycle parking with reference to the Parking Standards and Design SPD.

3.69 The Site is located within Zone 2 for the purposes of the Council's car parking standards. The car parking requirement is, therefore, 1 space per 1/2 bed flat with 1 space per 10 flats for visitors. If a lower car parking provision is sought, this would need to be justified by demonstrating that there would be no detriment to highway safety as a result. The Council's cycle parking standards require a minimum of 0.5 spaces per 1/2 bed flat.

3.70 The Proposal provides 5 car parking spaces and 8 cycle parking spaces for the proposed 6 flats. Based on the prevailing car-ownership levels among flats in the local area, of 0.6 cars per unit, the proposed five parking spaces are appropriate for the Proposal, accommodating residents' and visitors' parking without creating additional on-street parking demand.

3.71 The accompanying Transport Statement consider this provision in the context of the Site's location and the Proposal and concludes it is in line with the Council's policies. Most importantly, there would be no detriment to highway safety as a result of the Proposal.

3.72 The Site is in a highly sustainable location, well-served by frequent bus services and a key cycle route. It is within easy walking and cycling distance of the town and station. All parking spaces are also proposed with electric charging facilities to help reduce emissions where private car journeys are undertaken.

3.73 The accompanying Transport Statement concludes that, based on the prevailing car-ownership levels among comparable flats in the local area, equating to 0.6 cars per flat, the proposed five parking spaces are appropriate for the Proposal, accommodating the likely residents' and



visitors' parking without creating additional on-street parking demand. The provision of 8 cycle parking spaces exceeds the Council's standards. The Proposal as a whole is in accordance with Reading Borough Local Plan Policy TR5.

SUSTAINABLE DESIGN & CONSTRUCTION

- 3.74 The Council's sustainable design and construction requirements set out in Policy CC2 are noted and will be met by the Proposal. The accompanying Sustainability Statement responds to these requirements in detail to demonstrate compliance with the policy.

TREES & LANDSCAPING

- 3.75 Policy EN14 seeks to protect trees within new developments and look for opportunities for additional tree planting. The Tree Survey Report submitted with this request for pre-application advice assesses the tree within the Site and one on the adjacent site.
- 3.76 The tree on the frontage of the Site is thought to be a self-seeded Sycamore which does have landscape value but is only a category B2. The Ash tree on the adjacent site was found to have signs of Ash Dieback and is categorised as a U. The Sycamore can be retained with the development scheme. The Ash may need to be removed in any event because of its condition but it lies outside the Site and its root development onto the Site will have been impeded by the boundary wall.
- 3.77 The Arboricultural Impact Assessment confirms the retention of the Sycamore tree. The Method Statement sets out how this will be secured through the construction of the Proposal.
- 3.78 Considerable new planting is planned for the Site as part of a comprehensive landscaping scheme, including several new trees and new hedging along all boundaries. This is set out in detail in the Landscaping details submitted with the application.

ECOLOGY

- 3.79 Policy EN12 looks for all new developments to avoid a net loss of biodiversity. A Bat Scoping and Ecological Appraisal has been submitted with the application. This confirms that no evidence of roosting bats was found during the survey. However, following this inspection, the bungalow was assessed as having 'low' potential to support bat roosts based on the features identified.



- 3.80 Recommendations are also made for reasonable avoidance measures with regard to nesting birds in the trees and buildings. However, Due to the nature of the site and the habitats and structures present, all other areas due to be affected by the proposals are of negligible potential for utilisation by other protected or notable species.
- 3.81 The proposed redevelopment of the site, removing the existing building and hard surfacing, and the resultant landscaping scheme, will ensure that there is a tangible enhancement to biodiversity on the site as a result. The landscaping scheme includes the addition of bird bricks and boxes, a sedum roof on the cycle store and new tree and hedge planting, which will provide further nesting opportunities. Plant species have also been carefully selected to attract bees and other pollinators.

AFFORDABLE HOUSING

- 3.82 Policy H3 requires a financial contribution to be made towards off site affordable housing equivalent to 20% provision on sites of 5-9 dwellings. This requirement is noted. The Applicant welcomes the opportunity to discuss this with the Council in due course.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 3.83 It is noted that the Proposal will be CIL liable taking into account the offsetting of the existing floorspace on the Site. The appropriate forms and information are submitted with the application.



4 CONCLUSION

- 4.1 This Statement demonstrates how the Proposal has been designed taking into account the relevant planning policies and other guidance and the pre-application advice provided by the Council.
- 4.2 All of the requests for additional supporting information and refinements to the plans recommended in the pre-application advice have been taken into account in the final submission.
- 4.3 The following key benefits of the proposal should be taken into account when assessing the Proposal:
- Removal of the existing buildings which detract visually from the significance of the adjacent listed building.
 - Removal of the previous commercial use, which had a detrimental impact on neighbouring residents.
 - Provision of an attractive, well designed and high quality development that will be an asset to the local area and will enhance the setting of the adjacent listed building.
 - Provision of good quality internal residential accommodation to meet local need.
 - Provision of a new building built to the requirements of sustainable design and construction.
 - Significant biodiversity and landscaping enhancements across the site.
- 4.4 On balance, taking into account the location of the Site, the adjacent listed building, the significant benefits offered by the Proposal and the other material considerations we invite the Council to agree with our conclusion that the Proposal can be supported and planning permission should be granted.