

Planning Design and Access Statement

Erection of two storey apartment block comprising 2No. one bedroom flats with associated parking, landscaping and refuse storage.

Land at Abbotsmead Place
Reading
RG4 8BB

On Behalf Of
Tilco

June 2018



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1 Introduction

1.1 This statement has been prepared on behalf of Tilco Ltd in connection with a planning application for the erection of a two storey apartment block comprising two one bedroom flats with associated carparking, landscaping and waste storage at land at Abbotsmead Place Reading.

1.2 The information supplied in support of this application comprises:

- Completed application form;
- Drawing L01 Location Plan;
- Drawing B01 Rev A Block Plan;
- Drawing P01 Proposed Site Layout;
- Drawing P02 Proposed Plans;
- Drawing P03 Proposed Elevations;
- Survey Drawing SD17310-1
- Planning, Design and Access statement prepared by KRL Planning;
- FRA prepared by PBA;
- Flood Risk Sequential Test prepared by PBA;
- Tree Survey and Arboricultural Impact by Martin Dobson Associates
- Tree Protection Plan by Martin Dobson Associates;
- Tree Constraints Plan by Martin Dobson Associates
- Sustainability Statement by Harding Rose
- CIL Form

2 Site and Surroundings

2.1 The site comprises an irregularly shaped plot of land of approximately 0.03Ha fronting on to Abbotsmead Place. The site comprises an area of overgrown scrubland which has recently been cleared. To the north the site is bounded by Abbotsmead Place and a supermarket carpark beyond. To the east it is bounded by a footpath with 8-11 The Willows beyond. To the south are the properties numbered 17 and 18 The Willows and to the west there is a carpark and 21-22 The Willows.

- 2.2 The surrounding properties are comprised of two storey buildings with a mix of terrace properties, linked detached houses and maisonettes/ flats built in the late 20th century, with brick and plain tile finishes. There is a small group of trees on the southern boundary of the site.
- 2.3 The site is in a sustainable location close to shops and services at Caversham
- 2.4 The site is not within a Conservation Area. The site falls within Flood Zone 2

3 Planning History

- 3.1 There are no entries on the planning register for the site as available on the Council's web pages.

4 The Proposal

- 4.1 The proposal consists of the erection of a two-storey block of flats comprising 2 one bedroom flats. The floor areas of the apartments are set out in Table 1.

Table 1 Floor areas

Unit	Bedrooms	Floor area (Sqms)	Minimum GIA National Standards
1 (1 person)	1	44.8	39
2 (2 person)	1	50.1	50

- 4.2 The building comprises a two storey, 7.3m high, pitched roofed apartment block. The proposed materials for the building will mainly consist of brick on the ground floor and render on the first floor, with plain roof tiles.

- 4.3 The building will have two ridge lines and it has been designed to appear as an extended house with a subservient two storey extension, some 6.7m tall. The eaves height across the whole building is set at 4.95m. The building has been designed to take account of the shape of the irregular shaped plot and the need to provide a 3m wide easement for a sewer line which cuts across the site diagonally from north west to south east.
- 4.4 The building will be 11.3m wide and up to a maximum depth of approximately 7.6m on its eastern flank. The rear portion of the building will have regular step backs resulting in the depth of the building reducing down to 3.9m.
- 4.5 The overall design and scale of the building reflects the character of the neighbouring dwellings.
- 4.6 The building will be located some 12m from the fronts of 8 and 9 The Willows. The minimum back to back separation distance between the proposed building and the nearest properties to the rear is approximately 20.5m
- 4.7 An existing 2m tall fence separates the site from the neighbouring carpark and residential properties to the south and west of the site. This fence will be retained and a new 2m high fence will be erected along the eastern side of the site to enclose the garden area for the flats. The flats will have approximately 133sqms of amenity space and a rear garden with a minimum depth of 13.2m. The new fencing will not enclose all of the site at the rear. There will be a gap of up to 1.5m between the fence and the footpath, which runs to the east of the site. Due to the route of the footpath the gap between the path and the new fence will be reduced where the fence encloses the flank elevation of the proposed building.
- 4.8 The principle elevation will be facing on to Abbotsmead Place. Two carparking spaces will be provide with direct access off Abbotsmead Place. The front of the site will be kept open with no boundary walls and fencing. Shrub planting will be used to separate public and private space at the front of the plot.

- 4.7 Cycle storage for at least 4 bicycles and waste storage to meet the councils requirements will be positioned at the rear of the building, which will be accessed by a path on the western side of the building

5 Planning Policy

- 5.1 Relevant Planning Policy appertaining to the development proposals are contained in National Guidance, in the form of the National Policy Planning Framework Core Strategy adopted in 2008, the Sites and Detailed Policies Document adopted October 2012 as amended January 2015. as well as Supplementary Planning Documents

National Planning Policy Framework (NPPF)

- 5.2 At the heart of the NPPF is a *“Presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision making”*. In respect of decision taking this means inter alia approving development proposals that accord with the Development Plan without delay
- 5.3 Twelve core planning principles are identified which should underpin both plan making and decision taking. A number of these core principles are relevant to the current proposals being:-
- Always seek to secure a quality design and a good standard of amenity for all existing and future occupants of land and buildings
 - To encourage the effective use of land by reusing land that has been previously developed (brown field land), provided that it is not of high environmental value

- 5.4 At paragraph 49 in respect of delivering a wide choice of high quality homes it states that housing applications should be considered in the context of the presumption in favour of sustainable development, and relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing.
- 5.5 Paragraph 50 also encourages Local Authorities to plan and deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 5.6 In respect of good design Paragraph 56 states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Design policies in Local Plans should be based on stated objectives for the area, in response to an understanding and evaluation of its defining characteristics.
- 5.7 Paragraph 58 goes on to identify the aim of planning policies decisions, to ensure the developments:-
- Function well and add to the overall quality of the area
 - Establishes a strong sense of space
 - Optimises the potential of the site to accommodate development
 - Create safe and accessible environments
 - Respond to local character
 - Visually attractive as a result of good architecture and appropriate landscape.

Development Plan Policies

Reading Borough Core Strategy adopted 2008

- 5.8 Below are the main policies considered to be relevant to these proposals with a short summary of the thrust of each policy.
- 5.9 Policy CS4 deals with accessibility and intensity of development whereby development sites will be assessed in terms of their accessibility to services and facilities. With regards to the application site, it is considered that the site is in a highly sustainable location in terms of accessibility to Caversham's and Reading's local services and facilities.
- 5.10 Policy CS5: Inclusive Access requires all buildings to be located, sited and designed to provide suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily. The building is in a sustainable location, close to shops and services. The proposed building has been designed to meet Part M of the Building Regulations
- 5.11 Policy CS6 restricts all development to within the settlement boundary. The site is located well within the settlement boundary.
- 5.12 Policy CS7 Design and the Public Realm requires all development to be of high design quality that maintains and enhances the character and appearance of the area. The proposed development takes account of its surroundings and it is of a scale and design which reflects its locality
- 5.13 Policy CS14 sets out the council's housing requirement over the plan period. The application proposal, even though it only adds two extra residential units, does help in achieving the council's housing requirement.

- 5.14 Policy CS15 deals with the issues of location, accessibility, density and housing mix in that the density and mix of residential development should be informed by the characteristics of the area, accessibility, the need for high quality design and need to minimise environmental impacts, including impacts on residential amenities. It also requires development to help in providing a mix of houses in terms of housing types, sizes and tenures
- The proposal is located in a sustainable location and it will provide two smaller dwellings at a density of 54 dph in a highly accessible suburban location.
- 5.15 Policy CS16: Affordable Housing requires developments of 15 dwellings and above to provide 30% of the total number of dwellings in the form of affordable housing. The proposal will only provide 2 dwellings, therefore under this policy no affordable housing needs to be provided.
- 5.16 Policy CS24: Car/ Cycle Parking seeks to ensure maximum car parking standards and cycle parking in relation to the accessibility of locations within the Borough. The proposal will provide 2 carparking spaces and cycle parking for at least 4 bicycles.

[Reading Borough Council LDF Sites and Detailed Policies document adopted 2012](#)

- 5.17 Policy SD1 deals with the issue of the presumption in favour of sustainable development and that a positive approach to development should be adopted. Development that accords with the development plan should be approved unless material considerations indicate otherwise and conversely if proposals do not accord with the development plan they should be refused unless material considerations indicate otherwise.

- 5.18 Policy DM1 requires development proposals to demonstrate how they have been designed to incorporate measures to adapt to climate change
- 5.19 Policy DM4 seeks to ensure that new development does not have a detrimental impact on the living conditions on existing and new residential properties
- 5.20 Policy DM5 seeks to ensure that on developments of 10 or more dwellings in specific parts of the Borough, 50% are 3 bed dwellings and that the majority of housing will be in the form of houses rather than flats. As the proposal is for 2 dwellings this requirement for 3 bedroom dwellings does not apply.
- 5.21 Policy DM6 seeks to provide an element of affordable housing on sites of less than 15 dwellings, either through on site provision or by a payment in lieu. For a scheme of less than 4 dwellings a payment in lieu is requested.
- 5.22 Policy DM10 is aimed at ensuring that residential dwellings have appropriate outdoor space

6 Planning Assessment

- 6.1 The proposal will provide two, one bedroom flats, built over two floors, which meet the national internal space standards. The two storey brick built building at a height of 7.3m, will be of a scale and design which will fit comfortably with the design of the neighbouring ,late 20th century properties which surround the site on three sides. The surrounding properties are a mixture of terrace houses, two storey maisonettes and linked detached houses.
- 6.2 The resultant density of development of the site would be 54dph, which due to its close proximity to Caversham District centre, with its good public transport links, would be categorised as an accessible sub urban location, where densities of between 35-55dph are considered appropriate under policy CS15.

- 6.3 The proposal involves the building on an area of unused scrubland of no ecological value, which makes best use of undeveloped land within an urban area to provide much needed residential accommodation.
- 6.4 The building's location and two storey designs ensure that it does not have a detrimental impact on the amenities of neighbouring properties. The nearest properties to the site are 8-11 The Willows. The fronts of these properties are some 12m from the flank wall of the proposed building. There are no windows in the proposed flank windows. Therefore, due to the proposed separation distances, the limited height of the building and the fact that there will be no flank windows in the building, the proposal will not have a detrimental impact on the nearest neighbours in terms of overlooking, loss of privacy, loss of light or overshadowing.
- 6.5 The back to back separation distances between the proposed building and the neighbouring properties to the rear meets the council's minimum requirement of 20m. The building will have a minimum rear garden depth of 13m and it will have 133sqms of amenity space, which exceeds the minimum requirement of 25sqms of amenity space per 1 and 2 bedroom flats in accordance with policy DM10.
- 6.6 As set out in the Sustainability Statement submitted with the application, due to the constraints of the site the building will have a northerly facing road frontage and southerly rear amenity space which will benefit from good levels of sunlight throughout most of the day. The internal layouts of the new flats have also been designed with the principle habitable rooms ie living room and bedroom located on the south elevation. Natural ventilation to the main habitable rooms can be readily achieved as the main openings are located on opposite facing walls ensuring there will be a good cross flow of ventilation air through the dwellings. The use of natural ventilation can be enhanced with energy efficient mechanical ventilation if required by the Building Regulations Part F.
- 6.7 The roof has been designed with a mainly southerly facing pitched roof which can be used for photovoltaic panels or solar water heating. The dwellings will be built to maximize water efficiency and proposed to have single bathrooms only. As a minimum the predicted water consumption will be assessed to ensure that the water consumption is limited to 105 litres per person per day which can be achieved through the selection of the following types of fittings.

Dual flush wc's

Low flow monobloc mixer taps

Low flow shower fittings

Low water usage washing machines and dishwashers

- 6.8 It is intended to provide a development with safe, easy and inclusive access for all residents and visitors. The concept of such access for all is based on an inclusive approach to design whereby all users, not just those with disabilities, are taken into account. Disabled access has been considered for the ground floor flat in the light of Part M of the Building Regulations. The parking spaces are located close to the main entrance and other current legislation will be addressed at the construction stage to comply with Part M of the building regulations.
- 6.9 The new entrance doors will also comply with Part M, current at the time of construction. All main entrance threshold weathering strips will not exceed 15mm in height and shall be in a contrasting material to the external paving and internal floor finish. Where provided, all internal corridors shall be a minimum of 1.2m wide. All internal doors will have minimum 838 mm wide leaves.
- 6.10 The site is not located on a major road and therefore air pollution is not considered to present any problems which need to be specifically addressed. Inquiries were made with the council's Environmental Health Department on this matter due to the sites location in an Air Quality Management Area. The Environmental Health Department advised that no air quality Management report was required, due to the site's location. Light pollution is similarly not considered to be a problem however external light fittings will be chosen and located to minimize light nuisance to adjoining properties.
- 6.11 The proposal shows the provision of 2 off street car parking spaces, located to the front of the building. The number of proposed car parking spaces complies with the council's parking standards. The scheme will also provide safe and secure cycle parking for up to 4 bicycles at the rear of the building.
- 6.12 Waste storage to meet the council's requirement will be provided at the rear of the building.

- 6.13 The application is accompanied by a Tree Survey, Tree Protection Plan and Tree Constraints Plan. The retained trees on the site comprise a group of B and C category Norwegian Maples located on the southern boundary of the site. The proposal will have no impact on the trees.
- 6.14 It is considered that the proposal complies with policies with policies CS4, CS5 CS6 CS7, CS15, CS24, S1 DM4 and DM10.

Flooding

- 6.15 The site falls within Flood Zone 2. A separate FRA and FRA Sequential Test Assessment prepared by PBA accompanies this application. The NPPF states that sites with a greater probability of flood risk must provide a Sequential Test to establish whether there are any reasonably available and suitable sites for the proposed development within Flood Zone 1. PBA have undertaken a full assessment of potential alternative housing sites in Flood Zone 1 within the administrative area of Reading Borough Council, which are suitable and reasonably available for the proposed development. The Sequential Test assessment concludes that there are no housing sites that are sequentially preferable and available that could accommodate a similar number of residential dwellings. Therefore, the Sequential Test has been satisfied.
- 6.16 The FRA confirms that the site lies within Flood Zone 2 'Medium Probability', and that the proposed 'More Vulnerable' development is deemed appropriate development within Flood Zone 2 subject to the Sequential Test being passed.
- 6.17 PBA updated the EA hydraulic model for the River Thames between Mapledurham and Sonning (Reading Complex Change model (2011), to model flood extents for the applicable climate change allowance events. The resultant climate change outputs extracted from the updated model indicate that the majority of the site will not be affected by flooding during a 1 in 100 annual probability +25% or +35% climate change allowance event. The south-east corner of the site impacted by these events will not be subject to built development or ground raising, and as such there will be no impact on floodplain storage.

6.18 The flood risk to the site is mitigated by incorporation of the following:

- Proposed ground floor levels at a minimum of 38.61m AOD, 300mm above the reference 1 in 100 annual probability +25% allowance for climate change flood level (and 240mm above the equivalent +35% flood level), and a suitable freeboard above surrounding ground levels. (The existing site ground levels are such that the required floor level can be achieved without unduly raising the building);
- A continuous safe access route available to land outside the floodplain via the adjacent supermarket car park and School Lane, north of the site;
- Suitable SUDS features to ensure that the development does not increase the risk of surface water flooding.

6.19 The FRA concludes that; the future occupants and users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. The proposal complies with the National Planning Policy Framework (NPPF) and local planning policy with respect to flood risk and is an appropriate development at this location.

Affordable Housing

6.20 Policy DM6 of the SDPD requires a financial contribution to be provided towards affordable housing elsewhere in the Borough for schemes of 1 to 15 dwellings.

6.21 Following the Court of Appeal's judgement on 13 May 2016, the Written Ministerial Statement of 28 November 2015 (WMS) has been reinstated. This, together with the national Planning Practice Guidance, clearly indicates that '*contributions should not be sought from developments of 10-units or less, and which have a maximum combined floor space of no more than 1,000 square metres.*' This is a material consideration which should be afforded significant weight as national planning policy, which post-dates the adoption of the adopted development plan and its 'altered' status in January 2015.

6.22 It is argued that case law on the provision of affordable housing is clear in that local circumstances may justify lower thresholds as an exception. If and when a lower

threshold than that set out in national policy is used, this should be an exception not the rule. This is the approach of the Planning Inspector in their appeal decision for Appeal APP/E0345/W/16/3160994 Land adjacent 26 Woods Road, Caversham, Reading.

- 6.23 Therefore notwithstanding the Council's current affordable housing policy it is considered that there is no justification to require a financial contribution towards affordable housing as part of this proposal, as the scheme is for substantially less than 10 dwellings in an urban location. National guidance does not require the provision of affordable housing for schemes of less than 10 units. Current National guidance postdates the council's adopted development plan policies and therefore takes precedence. The appeal Inspector in allowing the appeal for 2x4 bedroom houses under appeal APP/E0345/W/16/3160994 stated:

"In this case, I do not find the local circumstances, difficult as they may be perceived by the local planning authority to be, mean that an exception to national policy is justified."

- 6.24 It is therefore argued that no affordable housing contribution should be provided for this application.

7 Conclusion

- 7.1 It is considered that the proposal accords with the policies of the Development Plan and the NPPF.
- 7.2 The proposal is a sustainable form of development, which provides additional new dwellings to meet the council's housing requirement. It makes the best use of land in an urban area.
- 7.3 The proposal is of a high quality design which is compatible with the area. It adds to the quality and variety of the street scene. It ensures that it is not harmful to the amenities of adjoining neighbours or future occupants, in terms of overlooking, loss of privacy, overshadowing or loss of light.

- 7.4 The proposal accords with the provisions of the NPPF taken as a whole and as result the presumption in favour of sustainable development applies and the application should be approved.