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Planning Application Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir / Madam,

Brindles, Lyefield Court, Emmer Green, Reading, RG4 8SH

Planning application for the erection of 9 no. dwellings, with associated access, parking and landscaping & alterations to the existing (retained) dwelling

Introduction

We refer to the above and write on behalf of our client, Knole Homes in relation a detailed planning application for the below proposals:

Erection of 9 no. dwellings, with associated access, parking and landscaping & alterations to the existing (retained) dwelling

Particulars are enclosed in support of the application include:

- Full pack of architectural drawings
- This Planning Letter Statement (that includes an Affordable Housing Statement & reference to S106 heads of terms)
- Design & Access Statement
- Transport Statement
- Ecological Report
- Tree report and plans.

1: Site Context

The site comprises a detached two storey dwelling, set in a large garden, situated at the northern end of Emmer Green. Access is via Lyefield Court available via the northeastern corner of the site. As detailed within the supporting Transport Statement, the site is in a location that benefits from medium accessibility to key services and facilities. Regular bus services are available from Kidmore End Road

and a children's day nursery, primary school, Coop and Budgens supermarkets and a public house are within a short walking distance from the site.



Figure 1 – Google Maps aerial view of the site & surroundings. Existing dwelling marked with a red star

The site is level and defined on its western, eastern, and northern boundaries by existing hedges, with a close boarded fence on the southern boundary. To the south and east is a development of flats (The Conifers, Lyefield Court), to the west are school grounds (Emmer Green Primary School), and to the north lies the former Reading Golf Course, which is now at an advanced stage of construction with residential development along the common boundary with Brindles (Policy allocation CR1b approved under LPA planning ref: 221312). A copy of the approved layout plan relating to the former Reading Golf course site presently under construction by Bovis Homes is provided below.



Figure 2 – Extract from approved proposed coloured site layout plan (PL-054 Rev J) for Reading Golf Club site showing layout adjacent to boundary with Brindles.

In terms of the planning policy context, the site is located within the Reading urban area boundary, and as such there is support in principle for the development of the site for additional residential development. In accordance with national and local planning policy objectives and therefore in accordance with Local Plan policies, there is no objection in principle to the proposal. Any such development is required to have regard at the Local Plan level to the relevant development management policies for detailed consideration, including design, character, density, housing mix, affordable housing, access/highways, parking provision, trees and ecology. Such matters are considered further below.

2: Planning History

The site has relevant planning history which forms relevant the context for this proposal.

08/00161/FUL

Planning permission for new house and garage, granted 30/10/08

This proposal was proposed in 2008 and granted permission accordingly. Extracts from the approved drawings are provided below.

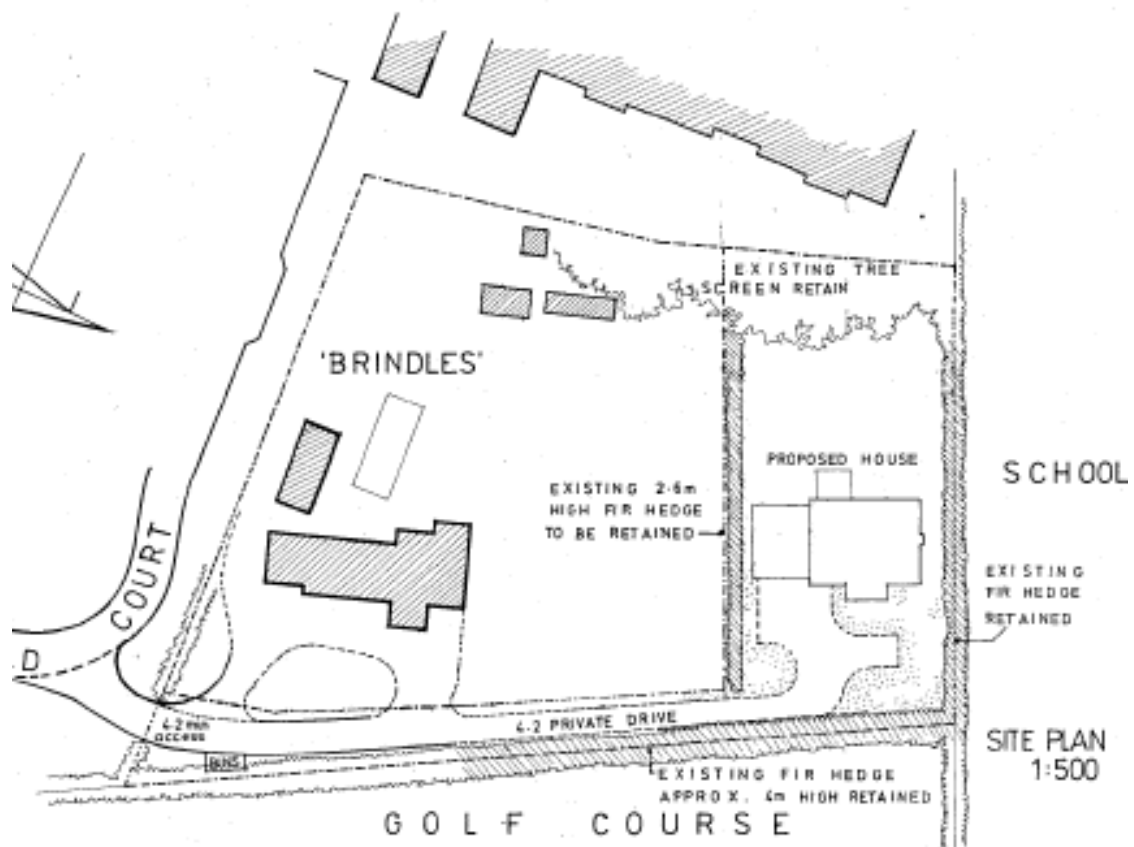


Figure 3 – Extract from approved planning drawing (no. 6B) showing siting and footprint of approved dwelling and garage, to the east of Brindles (drawing not aligned to north).



Figure 4 – Extract from approved planning drawing (no. 6B) showing front elevation design of approved dwelling and garage.

This permission has been 'implemented'. The conditions were discharged (LPA Ref: 111836, Discharge of conditions numbers 4, 6, 9, 10, 12, 13, 14 and 15 relating to planning application reference 08/00161/FUL, approved 19.09.2011) and the footings have been dug.



Figure 5 – Photographs showing footings of implemented permission 08/00161/FUL in foreground, and residential development The Conifers beyond the site boundary.

Whilst the planning permission is technically live, the applicant does not intend to continue to implement the permission **if** this planning application is successful. Instead, if granted this proposed application would be implemented in place of this implemented and the extant (details of second planning permission below) permission for development on the site. However, it does form a relevant fallback position to which significant weight must be attached (consistent with case law including the judgments referenced below). This is entirely logical given if permission is not granted, the applicant will proceed to complete the implemented planning permission.

221294

Erection of new dwelling and garage, granted 22/12/2023

A further recent planning permission is for the land in between the existing dwelling Brindles and the house granted in 2008. Relevant extracts from the approved drawings are provided below.

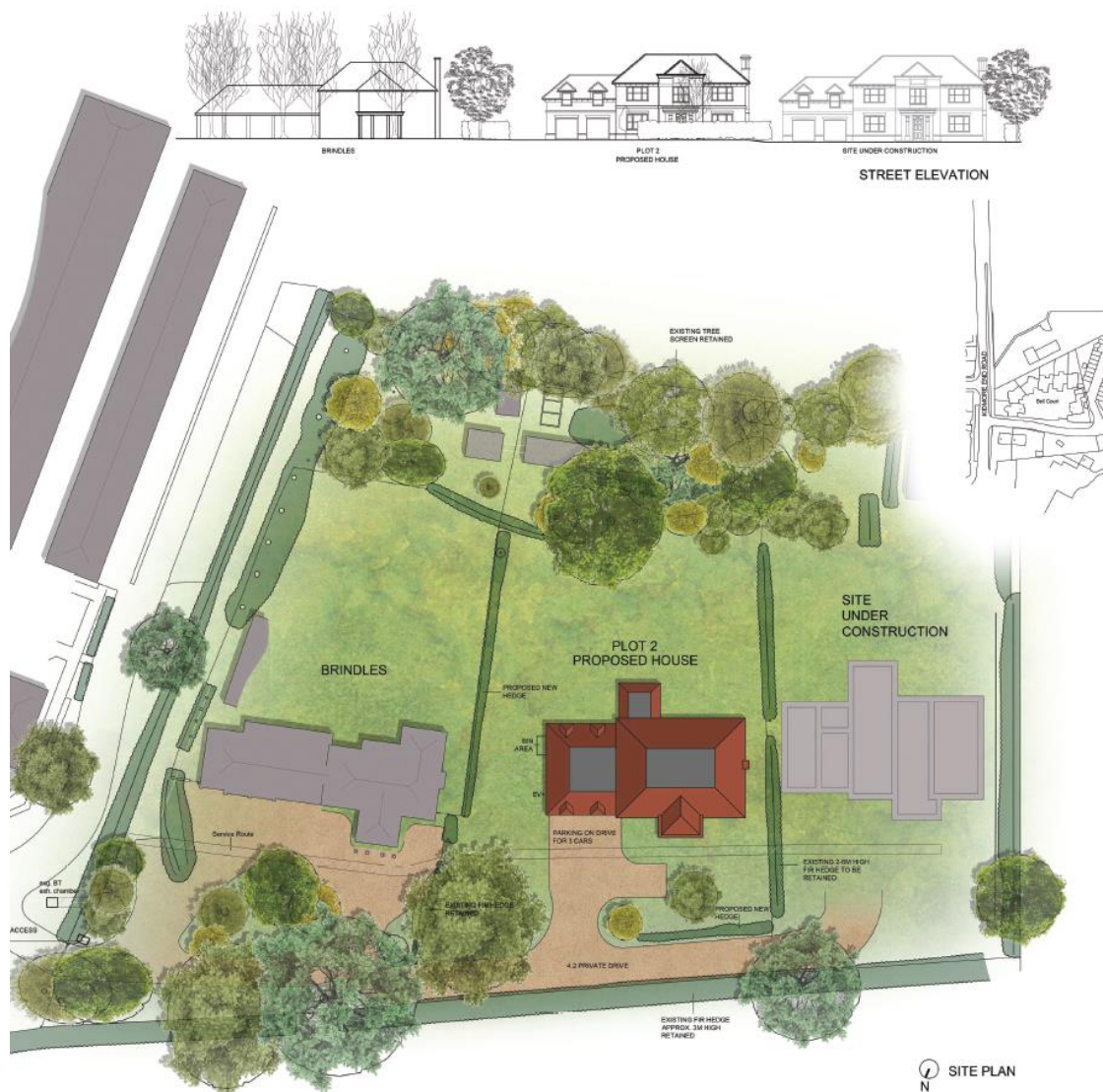


Figure 6a – Extract from approved drawing 1920-SP1B showing site plan and streetscene for the site



Figure 6b – Extract from approved elevation drawing

Together, the two planning permissions for new dwellings on the site establish a number of important principles (or points of agreed ground):

- The principle of developing the site for additional housing is acceptable.
- Utilising the site access for additional vehicular movements is acceptable.
- An approved approach towards the relationship with existing trees along the northern site boundary forming new hardstanding to serve as a private drive.
- The principle of a substantial two storey development.
- A traditional design & architectural style of new dwellings.

Case Law Relating to a Fallback Position

A fallback position comprises an alternative course of action that may be taken if an original plan fails. The following points arise from the case law:

- Whether there is a real prospect is matter of planning judgment but a 'real prospect' is one that is more than 'a mere legal or theoretical entitlement' (R (Ahern) Secretary of State for the Environment and Havering BC [1998] Env. L. R 189 at [196]);
- For a prospect to be a 'real prospect', it does not 'need to be probable or likely: a possibility will suffice' (Samuel Smith Old Brewery (Tadcaster) v SSCLG [2009] EWCA Civ 333 per Sullivan J at [21]); and
- A developer does not need to have 'said precisely how he would make use of any permitted development rights available to him' (Michael Mansell v Tonbridge and Malling BC [2017] EWCA 1314 at [27]). Where it was a 'simple and obvious reality' that the developer had the firm intention to redevelop a site in any event and to exercise permitted development rights to do so were planning permission refused, this is a consideration to which a local authority ought to have considered (see paragraphs [28] and [30] of Mansell).

The implemented and approved schemes form recognised fallback positions. They are realistic opportunities that will be pursued if this application fails. For the reasons detailed throughout this statement, the proposed scheme offers a proposal that complies with the development plan but also offers a far improved set of planning benefits when compared to the fallback position.

Further planning history relating to the site

Further planning history (of less relevance to the subject scheme) includes:

- 101887 – Single-storey and first floor rear extension (to Brindles), granted 23/12/2010.
- 162274 – Branch pruning to one sweet chestnut, refused 15/12/2016.

3: Site Constraints

The site is not constrained by listed buildings nor is it located within a Conservation Area. Further, the site is not located within the Green Belt.

Brindles contains 3 TPO trees; two Limes by the entrance off Lyefield Court and a Sweet chestnut in the rear garden of the retained (original) house. These will be retained and protected as required during the construction phase.

As evidenced by the below Environment Agency Flood Map, the site is entirely within flood zone 1. It is also identified as being at low risk for surface water flooding. There are therefore no flood risk constraints to the proposed development. The site area is also below 1ha, so a Flood Risk Assessment is not required.

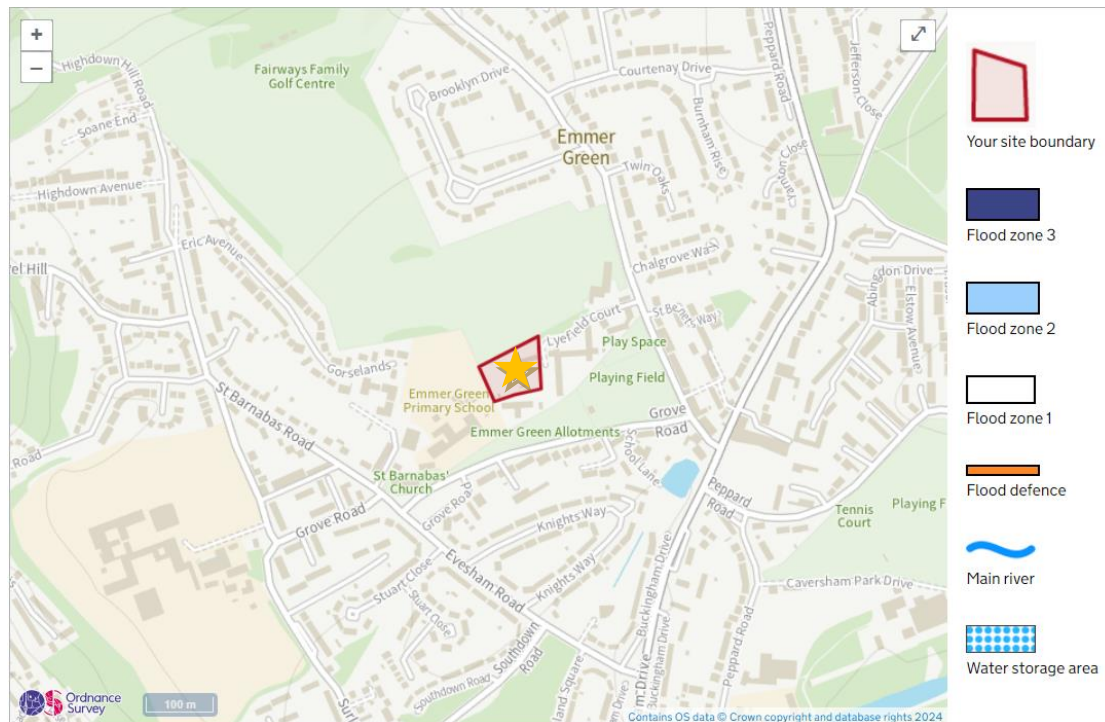


Figure 7 – Environment Agency’s flood risk map for planning

4: Planning Policy Context

The development plan covering the site consists of the Reading Borough Local Plan (adopted 2019).

This development plan is supported by a number of supplementary planning documents. Those considered relevant to redevelopment of the site for housing include:

- Revised Parking Standards and Design SPD (2011);
- Sustainable Design and Construction SPD (2019); &
- Affordable Housing SPD (2021).

Local Plan

Reading Borough Local Plan was adopted in November 2019. The policies considered relevant to this proposal are set out below:

- CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
- CC2: SUSTAINABLE DESIGN AND CONSTRUCTION
- CC3: ADAPTATION TO CLIMATE CHANGE
- CC5: WASTE MINIMISATION AND STORAGE
- CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT
- CC7: DESIGN AND THE PUBLIC REALM

- CC8: SAFEGUARDING AMENITY
- CC9: SECURING INFRASTRUCTURE
- EN9: PROVISION OF OPEN SPACE
- EN12: BIODIVERSITY AND THE GREEN NETWORK
- EN14: TREES, HEDGES AND WOODLAND
- EN18: FLOODING AND DRAINAGE
- H1: PROVISION OF HOUSING
- 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

The Proposals Map confirms that the site has no policy constraints and is located within the settlement boundary of Reading, such that the presumption in favour of sustainable development is applicable under Policy CC1.



Figure 8 – Local Plan Proposals Map extract showing no policy constraints at the site

Affordable Housing Statement (Policy H3)

The development proposals comprise 9 dwellings and therefore falls within the 5-9 units category for contribution towards affordable housing. This requires a financial contribution equivalent to 20% of units provided. Paragraph 1.5 of the Affordable Housing SPD confirms that “Existing dwellings retained as single dwelling units as part of any scheme will not count against the affordable housing requirement”. The applicant acknowledges the need to provide a financial contribution as part of the proposals (from 2 valuers) and will provide details of the Gross Development Value of the proposals and a resulting calculation of the proposed level of financial contribution as part of the legal agreement process. It is anticipated that the only head of term needing to be included in a legal agreement is a financial contribution towards affordable housing.

Development of Private Residential Gardens (Policy H11)

The policy supports such development where the proposal makes a positive contribution to the character of the area, the site is of an adequate size to accommodate the development proposed, does not lead to tandem development, does not cause a significant detrimental impact to the amenity of neighbours, the emphasis is on family sized housing, and where possible the development provides biodiversity net gain. For the reasons detailed later in this statement, the scheme complies within this policy in full.

Revised Parking Standards and Design SPD (2011)

The site is within Zone 3 'Secondary Core Area' which has the following parking requirements:

	Residential Parking Provision			
	Zone 1	Zone 2	Zone 3	Zone 4
Residential				
C3 Retirement Home with Warden (spaces per individual units)	0.5 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff
C3 Dwelling Flat 1-2 bed	0.5	1	1.5	1.5
C3 Dwelling Flat 3+ bed	1	1.5	2	2
C3 Dwelling House 1 bed	0.5	1	1	1
C3 Dwelling House 2 bed	1	1	1.5	2
C3 Dwelling House 3 bed	1	2	2	2
C3 Dwelling House 4+ bed	2	2	2	3
Visitor Parking	0	1 space per 10 dwellings (Flats only)	1 space per 4 dwellings (Flats only)	1 space per 4 dwellings (Flats only)
Houses in Multiple Occupation (HMOs)	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**

As the table above shows, 3 and 4 bedroom dwellings require the provision of 2 parking spaces per plot. The scheme complies with these requirements, whilst enabling some excess provision to ensure no overspill parking on the surrounding network occurs.

National Planning Policy Framework ("NPPF") (Dec 2023)

The NPPF in its latest iteration continues to provide support for the overarching objective to boost significantly the supply of housing (para. 60). It also includes further emphasis on making the most effective use of brownfield sites within settlement boundaries, in paragraphs 23, 124d, 125, 126b, 129 and 130 and in the fact that it further restricts the consideration of the release of Green Belt land to accommodate additional residential development (para. 145).

Paragraph 130 is new to the NPPF and is in effect an implementing paragraph / policy. It states:

“In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan”.

It is evident, in the context of the NPPF as a whole, that a “significant” uplift in the average density of residential development may be inappropriate if the resulting built form would be “wholly” out of character with the existing area. This represents up-to-date policy and is material in the determination of planning applications.

The application scheme is reflective of the prevailing mixed vernacular immediately surrounding the site. Accordingly, the proposal in terms of its scale and intensity is acceptable and should be supported in principle. The key point arising is that the revisions to the NPPF stress the yet greater importance of delivering efficiently on sites within urban areas and it is only if a scheme is wholly out of character with the existing area that it should be refused. In this case, the scheme is wholly consistent in character terms and ultimately comes nowhere near to breaching this policy threshold.

5: The Proposal & Planning Policy Assessment

The scheme proposes the retention of the existing dwelling Brindles, with the demolition of an existing extension, and the erection of 9 no. dwellings, in a mix of 3, 4 and 5 bedroom 2 storey (with some limited accommodation in some roofscapes) semi-detached and detached dwellings. The below photo is of the existing dwelling and illustrates the part of the existing dwelling to be demolished and replaced with plot 1.



Figure 9 – Photograph of the existing dwelling, with the area to be demolished identified in orange dashed line.

The proposed dwellings have been laid out informally, with the existing access road continued and extended to the west and then in a southward direction in order to bring access into the site. The dwellings are all orientated facing onto the access road, with gardens situated to the rear, backing onto the site’s boundaries to the west and south. Plots 1 & 2 and the retained dwelling Brindles have south facing gardens

which back onto the boundary of plot 3. Plots 4 to 9 then have due east or west facing aspects so to ensure all plots will have good access to direct sunlight. On-plot parking is provided in the form of garages and driveways, with good sized private gardens provided to serve all dwellings.

Most of the existing trees and boundary planting are to be retained, and are proposed to be supplemented with additional planting. Indicative landscaping is shown on the proposed site layout plan and in the illustrative proposals prepared by the arboriculturalist. A detailed landscaping plan can be secured by way of a planning condition.

The location of the site access to serve the proposed development is as existing, and the route of the access road is similarly located to the access approved as part of the two extant planning permissions. This is helpfully illustrated on the below extract where a 4.2 wide private drive is shown to run along the site's northern boundary.

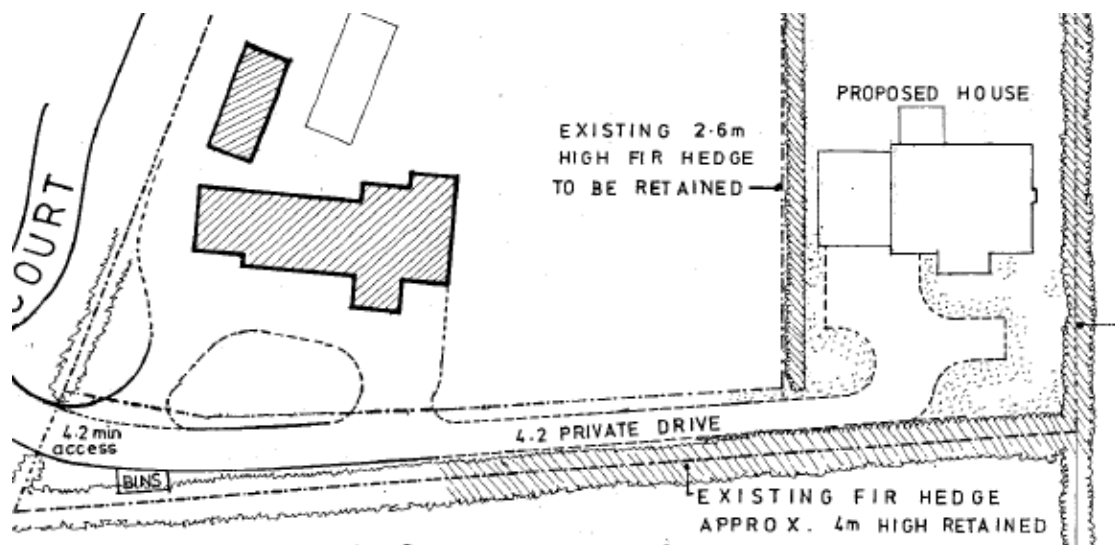


Figure 10 – Extract from approved site plan drawing 6B from planning permission 08/00161/FUL showing the siting of the access road along the northern site boundary.

Design

The dwellings have been designed in a traditional style, with brick banding, chimneys, half hipped roof details, brick headers, bay windows, tile hanging detail and gable detailing. These architectural details have been drawn from the surrounding vernacular, and brought together in the design of this development to create a sympathetic style. Some of these features were used in the relatively modern Bell Court, at the Kidmore End Road end of Lyefield Court. A traditional brick finish is envisaged consistent with the site's suburban context.



Figure 11 – Photograph of Bell Court development showing architectural details such as brick banding, brick headers and column detailing.

The proposals are for a conventional two storeys in scale but to include some limited accommodation in the roofscapes of plots 1, 2, 3, 4 and 7 / 8. The height of the dwelling remain of a typical two storey scale and very similar to the existing dwelling and the two and a half storey scale found at The Conifers to the south. Further, 2 to 3 storey development is found on the Golf Course redevelopment to the immediate north of the site. It follows that the proposed scale is consistent with the site's mixed surroundings that comprises a mix of 2 to 3 storeys in height.

Density & Mix

The site area is approximately 0.6ha. With the proposed 9 dwellings, and retained existing dwelling Brindles, the development proposed would result in a density of 17dph. Whilst this is below the policy H2 requirement of 30dph minimum, given the site circumstances and the extant planning permission for 2 additional dwellings on site (which would result in a much lower density of just 5dph), it is considered that the proposal as submitted represents a good balance between increased efficient use of the site and respecting and maintain the character of the site and surrounding development amenity. Furthermore, the provision of family housing, as preferred in Policy H11, results in a lower density than, for example, flatted development. Given the various elements for consideration in the preparation of this proposal, the mix and density is considered to be in accordance with the requirements of Policy H2, when set against other material considerations. It is therefore wholly justified and if higher would generate a potential character concern or fewer benefits than the proposals focus upon family sized housing.

The Need for Housing & Dwelling Mix

The principle of additional housing development on the site has been established by virtue of the extant planning permissions for additional residential development on the land. Supporting text to the Local Plan at paragraph 3.2.8 identifies that around 700 new homes will be delivered in North Reading during the plan period. Further, Policy CA1b allocates the land to the immediate north of the site for a medium density housing development (that is now under construction by Bovis Homes).

Policy H1 identifies a need to at least an additional 15,847 dwellings over the plan period. This is a minimum requirement (not a capped figure) and the scheme contributes positively towards this requirement through the provision of 9 new dwellings.

Further, Policy H2 details a preference for residential development to focus upon 3 bedroom or more housing outside the central area. Whilst this policy technically only applies to schemes of 10 or more units, the scheme achieves the active delivery of dwellings comprising the precise size most needed in this suburban area. This is further confirmed by the SHMA findings as detailed below:

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

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

The scheme therefore complies with and positively performs against Policies H1 and H2.

Affordable Housing

The equivalent of 20% provision as a financial contribution will be secured by a S106 Agreement, and is in accordance with the requirement of Policy H3. This can be agreed during the planning application process.

Parking Provision

The 4 plus bedroom houses all have a single garage, either attached or integral, in addition to 2 driveway parking spaces. The 3 bedroom houses have 2 driveway spaces each. This level of provision accords with the requirements set out in the adopted parking standards. Furthermore, the driveways will be laid out in permeable block paving to ensure they drain effectively.

Residential Amenity

Each house will have a generous private rear garden area, as well as spacious landscaped frontages which exceed the standard for private outdoor space set out in Policy H10. Furthermore, each dwelling comfortably exceeds the internal living space standards set out nationally and in accordance with Policy H5. A high quality of both internal and external amenity is secured through the proposals.

Impact upon Neighbours

Care has been taken in the design and evolution of the scheme to ensure that there are no adverse impacts on existing neighbours adjoining the site.

Plots 5-9 have their rear gardens backing onto the boundary shared with the primary school. This is in a similar arrangement to those on the shared boundary of the school and the former golf club site. This will provide security of the boundary by having it in private ownership. The existing hedge is proposed to be in part retained, which will provide natural screening of the development from the school site. Furthermore, the separation distance between the rear elevations and boundary is 12m, which is a standard rear garden length in a suburban setting.

The location of the access road along the northern site boundary mirrors the layout of development in the adjacent site to the north, on the former golf club, which also has an access road along this boundary, with new housing facing southwards. Given the distances involved and the presence of mature boundary planting, there will be little or no intervisibility between the developments.

To the east, proposed plot 1 will side onto the boundary with Lyefield Court access road, which continues around the east and south of the site to provide access to 25-32 Lyefield Court and The Conifers. Lyefield Court on the corner of the application site has a flank elevation. There is also intervening screening between the two developments, so no adverse impact will arise.

To the south is the 2 and a half storey flatted development of The Conifers which faces onto the site. Plots 4 and 5 have side elevations which address this boundary. Only 1 first floor window is proposed in each of plots 4 & 5, and that is serving the en-suites, so will be obscure glazed in any case. There will therefore not be any opportunity for intervisibility between the residents of The Conifers and the new development.

In terms of the relative siting and orientation of the buildings, The Conifers is predominantly situated in the centre of the southern site boundary, looking along the proposed access road. There will be an oblique view from the end unit (labelled as no.9 The Conifers) across the frontage of plot 5. The angle is sufficiently oblique and the development site is located to the due north so to ensure that no undue impact occurs in respect of any conceivable overbearing or overshadowing impact.

Overall, the scheme proposes relationships with neighbours that are commensurate with its suburban location and within conventional development management standards. It complies with Local Plan Policy CC8.

Access & Arboricultural Considerations

The principle of the location of the access has been established, and confirmed by the extant permissions. The supporting Transport Statement confirms that the site lies in an accessible location and confirms the site layout complies with Manual for Streets and local requirements for access road design, turning facilities and car parking provision. All dwellings will be provided with electric vehicle charging points consistent with Policy TR5. Accordingly, the scheme is appropriate in all highway respects.

In relation to trees, the 3 TPO'd trees are retained as part of the proposals. Where possible, existing mature trees are to be retained. Where removal is necessary to facilitate the proposed development, the illustrative landscaping scheme will replace and enhance the planting to ensure an attractive and high-quality development which accords with Policy EN14. The proposed access road follows a similar alignment as that approved under the extant permissions but actually turns southward earlier thus reducing the necessary hardstanding required within the root protection area of the off-site Oak tree located to the north of the site. For the reasons detailed in the Arboricultural Impact Assessment, the scheme has an appropriate relationship with retained trees and accords with Policy EN14.

Biodiversity Considerations

The supporting Ecological Appraisal confirms that there are no habitats of international, national, county or local importance that would be directly affected by the proposals. The site is of overall low ecological value, with the species recorded

described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded. Further, the appraisal refers to opportunities for the site to be further enhanced by providing roosting, nesting and sheltering opportunities for a range of species and the creation of new wildlife habitats, such as some of those recommended by the Chartered Institute of Ecology Environment and Management's published Biodiversity Net Gain Good Practice Guidance:

- Nest boxes
- Bug hotels
- Bat boxes
- Hedgehog houses
- Pollinator nest sites
- Planting wildflowers

Overall, the findings of this Ecological Appraisal confirm that there are no ecological constraints to the redevelopment proposals to preclude planning permission being granted. The scheme is submitted prior to the biodiversity net gain small site exemption deadline and thus no formal requirement to achieve a gain exists. However, a condition to enable the above ecological opportunities can be secured by way of the below planning condition (also attached to the extant December 2023 permission):

No development shall commence on site until details of biodiversity enhancements, to include at least two integral bird and bat boxes, tiles or bricks on the new buildings and native and wildlife friendly landscaping (including gaps at the bases of fences to allow hedgehogs to traverse through the gardens), and to include a timetable for implementation, has been submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancements shall thereafter be installed in accordance with the approved details and timetable and retained and maintained as such at all times thereafter.

The scheme is therefore been developed in accordance with the requirements of Policy EN12.

Flooding & Drainage Considerations

As detailed in section 3, the scheme is located in areas at the lowest risk of flooding. As a minor development, no Flood Risk Assessment or drainage strategy is required but a sustainable drainage system can be secured by way of an appropriately worded condition. The scheme therefore accords with Local Plan Policy EN18.

Planning Policy Summary

In summary, the scheme complies with all of the Local Plan policies and can be supported accordingly. This includes Local Plan Policy H11 whereby the scheme makes a positive contribution to the character of the area in respecting the prevailing suburban type of development found in the immediate locality and by ensuring no of arboricultural harm. The scheme's density strikes an appropriate balance between efficient use of the land, providing family sized housing and respecting the character of the area. The scheme complies, with highway requirements, provides appropriate residential amenity for future occupiers, offers ecological mitigation measures detailed within the supporting report and does not lead to any form of tandem development. The amenities of neighbours have been carefully considered in the scheme's design as consistent with conventional development management

requirements. Accordingly, the scheme complies with Policy H11 and all other policies such that it can be supported as development plan compliant. It also complies with the NPPF that seeks the efficient use of sites in existing urban areas and the provision of housing to meet minimum national housing targets. In this respects, the scheme also performs positively when compared to the fallback position, whereby the provision a far lower number of dwellings would be forthcoming despite the site forming a rare accessible location to contribute more substantively towards housing needs (as the subject scheme achieves).

6: Conclusion

The proposed development for 9 new dwellings represents a comprehensive and more efficient use of the site than the existing dwelling and the two extant planning permissions for single new houses. The site is located within the urban area and is in a accessible location, such that this development proposals can be supported in principle by the Council.

In summary, the proposal has been developed in response to the site specific characteristics and reflecting the local vernacular, whilst taking account of the various technical considerations and policy requirements. There is policy support, both in the NPPF and the development plan for development which is in keeping with the character and that makes a positive contribution to its locality.

As has been set out in this Planning Statement and supporting plans and documents, the proposed development has taken into consideration all relevant matters in terms of design, layout, access, parking, amenity space and trees. The proposals have been demonstrated to accord with the relevant Local Plan Policies as well as all relevant supporting guidance. As such, the scheme can be supported by the Council as one that wholly complies with the development plan.

Yours faithfully

Woolf Bond Planning

Woolf Bond Planning Ltd.
Encs.