

**DELEGATED APPLICATION REPORT - Application No. 240015/FUL**

**Address:** 70-78 Wokingham Road, Reading

**Proposal:** Demolition of existing building and construction of 6no 3 bed flats and 6no 2 bed flats over 3 storeys including parking, landscaping, bin and cycle stores.

**Case officer:** Ethne Humphreys

**Target date:** 7/5/2024

**Site Description and Surrounding Area**

The application site relates to the 'Tower Hotel' located on the south side of Wokingham Road, opposite Palmer Park. The site has been in use as a hotel for a number of years and is rather piecemeal in appearance with elements being linked together to form two large buildings joined by a first floor bridge. The hotel comprises 33 bedrooms and there is a restaurant/bar at ground floor.

The surrounding area is largely residential, with some commercial uses and to the north of the site on the opposite side of the road is Palmer Park a designated 'Local green Space and Public Open Space' (EN7Ed).

The site is located on a 'treed corridor' as designated in the Tree Strategy.

The site is located outside of a district or local centre, and the Wokingham Road local centre is located approximately 190m to the south east.

The site is also located within an area of potentially contaminated land and within an air quality management area.

**Proposal**

The application seeks full planning permission for the demolition of existing building and for the erection of two residential blocks linked at first floor level containing 12 flats in Use Class C3 with associated access and parking. This would comprise 6 x 2 bed and 6 x 3 bed flats.

The proposed materials include:

Red facings with contrasting brick detail

Slate tile

White upvc windows

Aluminium doors

10 car parking spaces are proposed, along with indicative soft landscaping.

**Plans Considered**

Location Plan PL-01

Existing Ground Floor Plan PL-04

Existing First Floor Plan PL-05

Existing Second Floor Plan PL-06

Existing Roof Plan PL-07

Existing Elevations (Front and Rear) PL-08

Proposed Site Plan PL-09  
Proposed Ground Floor Plan PL-10  
Proposed First Floor Plan PL-11  
Proposed Second Floor Plan PL-12  
Proposed Roof Plan PL-13  
Proposed Elevations (Front and Rear) PL-14  
Proposed Street Scene PL-15  
Proposed Side Elevations Block A PL-17  
Proposed Side Elevations Block B PL-18  
Proposed Section PL-19  
Proposed Overlay Plan PL-20  
Received 9th January 2024

### **Planning History**

211714/FUL Demolition of hotel and erection of 14 apartments. Refused.  
021361/FUL Erection of two single storey front extensions for enlarged bathroom and shower room. Permitted. 990782/FUL Second Floor Extension. Refused and Dismissed at Appeal.  
991637/FUL Erection of second storey to hotel to form 4 additional bedrooms, and fire escape from bridge. Refused.

### **Consultation Responses**

Transport - Objection, due to lack of turning area and waste collection details, discussed further below.

Natural Environment - Object. Insufficient landscaping principles. Discussed further below.

Environmental Protection - No objection subject to conditions to control construction hours, submission and approval of a construction method statement, bin store details, contaminated land assessment/remediation scheme and noise assessment and mitigation scheme.

Ecology - Object. Insufficient detail relating to Biodiversity Net Gain (BNG). Discussed further below.

RBC Housing - No comments received.

LLFA - No objection subject to conditions, discussed below.

Thames Water - No objection subject to condition relating to piling method statement.

### ***Public Consultation***

Nearby neighbouring properties were notified by letter and a site notice was displayed at the site.

3 letters of representation received (2 from the same person) raising the following concerns summarised as:

- Excessive height/visually dominant

- Loss of privacy/Overlooking
- Discrepancies with materials proposed
- Discrepancies in documents submitted
- Out of keeping
- Insufficient parking
- No provision for vehicle electric charging points

### **Correspondence from Councillors**

This decision is proceeding under delegated powers, as per alterations to the scheme of delegation (as agreed at Policy Committee 27/4/20). This allowed major planning applications, recommended for refusal by officers, to be determined under delegated powers, rather than be considered by the Planning Applications Committee. The application was originally 'called-in' by Councillor White. However, further to discussion with Members, it was agreed for the application to be determined under delegated powers.

### **Summary of discussions with applicant/agent:**

The agent was advised of concerns including relating to the design/bulk/massing/plot coverage and impact on the street scene, insufficient landscaping, ecology concerns and affordable housing matters. The applicant confirmed they wanted to receive the decision notice.

No formal pre-application advice was sought from the LPA prior to the submission of this application. However, following the refusal of application 211714, the case officer provided informal comments on revised plans 8/6/23. The feedback given has not fully been taken on board.

### **Equality Act**

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

### **Legal and Planning Policy Context**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".

Accordingly, the National Planning Policy Framework and the following development plan policies and supplementary planning guidance are relevant:

National Planning Policy Framework 2023  
National Planning Guidance 2014 onwards

The relevant sections of the NPPF are:

Section 2 - Achieving Sustainable Development  
Section 8 - Promoting Healthy and Safe Communities  
Section 9 - Promoting Sustainable Transport  
Section 11 - Making Effective Use of Land  
Section 12 - Achieving Well-Designed and Beautiful Places  
Section 15 - Conserving and Enhancing the Natural Environment

#### Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development  
CC2: Sustainable Design and Construction  
CC3: Adaptation to Climate Change  
CC5: Waste Minimisation and Storage  
CC6: Accessibility and the Intensity of Development  
CC7: Design and the Public Realm  
CC8: Safeguarding Amenity  
CC9: Securing Infrastructure  
EN7: Local Green Space and Public Open Space  
EN12: Biodiversity and the Green Network  
EN14: Trees, Hedges and Woodland  
EN15: Air Quality  
EN16: Pollution and Water Resources  
EN18: Flooding and Sustainable Drainage Systems  
H1: Provision of Housing  
H2: Density and Mix  
H3: Affordable Housing  
H5: Standards for New Housing  
H10: Private and Communal Outdoor Space  
TR1: Achieving the Transport Strategy  
TR3: Access, Traffic and Highway-Related Matters  
TR5: Car and Cycle Parking and Electric Vehicle Charging

#### Supplementary Planning Documents

Affordable Housing SPD (2021)  
Revised Parking Standards and Design SPD (2011)  
Revised SPD on Planning Obligations under Section 106 (2019)  
Sustainable Design and Construction SPD (2019)  
Employment Skill and Training SPD (2013)  
Tree Strategy (2021)  
Biodiversity Action Plan (2021)

### **Appraisal**

#### Land Use matters

Hotels are defined as 'Centre Uses' in the Local Plan. Policy RL3 (Vitality and Viability of Smaller Centres) states that within district, major local and local centres, development will not be permitted where there is net loss of 'centre uses' for 'non-centre uses' at the ground

floor. In this instance, the site is outside the town centre and other district centres. There is no other specific policy which would protect the loss of the hotel and, therefore, there is no in-principle policy conflict with the loss of the hotel. The existing building is of no architectural merit, nor is it listed, locally listed or within a conservation area. It is also noted that the hotel is somewhat 'rundown' in appearance.

Further to the above, the proposed replacement of hotel on the site with residential development would provide additional dwellings to the Borough's housing on stock on previously developed land - the principle of which aligns with the broad objectives of Policy H1 (Provision of Housing) in assisting meeting annual housing targets. The application is also situated within a predominately residential area, whereby its location and accessibility are considered to accord with Policy CC6 (Accessibility and the Intensity of Development).

From a purely land use perspective, provision of housing is welcomed. Had the proposal been supportable, a condition would have been used to secure the mix proposed to remain policy compliant in this respect. However, this is subject to the more detailed considerations of relevant Local Plan policies and the context of the application site. As the remainder of this report demonstrate, the proposal has failed to satisfactorily meet a number of other policy criteria.

#### Affordable Housing

Policy H3 (Affordable Housing) requires that within new residential development of 10 more dwellings 30% of the dwellings provided are in the form of on-site affordable housing. In support of the application a financial viability appraisal assessment has been submitted, seeking to justify a nil contribution towards Affordable Housing.

A Viability Appraisal has been submitted with the application. It would appear that payment of the viability review has not been made and as such the appraisal has not been reviewed by the Council's Valuers.

However, the application proposal raises other concerns that are detailed elsewhere in this report. The concerns raised are well beyond any situation whereby an Affordable Housing offer would affect the overall planning balance in this instance, noting also the nil provision proposed.

Therefore, the viability submission is not agreed, and it is not considered that the proposal is making an appropriate contribution towards affordable housing. Therefore, the application will be refused on the basis of not providing an appropriate contribution to affordable housing and being in the absence of a s106 legal agreement to secure that appropriate contribution towards affordable housing, contrary to Policy H3.

#### Unit Mix

The proposed scheme seeks to provide 6 x 2 bed units and 6 x 3 bed units. Policy H2 (density and Mix) is clear that on new developments for 10 or more dwellings outside the central area and defined district and local centres (with this site outside of all those areas) planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard

to all other material considerations. The scheme proposes 6 x 3 bed units which equates to 50% 3 bed units, and is in compliance with Policy H2.

#### Design Considerations and Impact on Street Scene

Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments.

Policy EN7Ed identifies that proposals will not be permitted that “erode their (Local Green Space’s) quality through insensitive adjacent development...”.

Since planning application 211714 was refused, the NPPF has been revised (December 2023). Beauty and a requirement for beautiful design components features heavily as a consideration in the new NPPF.

It is noted that the NPPF itself does not include substantial detail on how to assess beauty. However, it is used in relation to delivering beautiful new buildings and other development, which emphasises the importance of development to be well-designed and attractive in appearance in a way that integrates well with its surrounding context on order to satisfy the aim of creating beautiful development and beautiful places.

Paragraph 96 of the NPPF 2023 details that ‘beautiful buildings’ will be required from planning policies and decisions paragraph 135 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment.

Paragraph 139 of the NPPF 2023 advises that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.

The National Design Guidance identifies 10 key components for good design and of particular note is the characteristic of ‘Context’ and it states that “well designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones.” Additionally, there is specific reference to ‘views inwards and outwards’.

The existing character of the immediate surrounding residential buildings is typically one of two storey scale (with roof accommodation/dormers) Victorian buildings. As above, there is no in-principle objection to the existing hotel building being demolished in design terms and it is considered that there is some scope for increased scale in this location. However, this needs to be of a carefully considered design to ensure that new development maintains and enhances the character of the area and produces a beautiful building. Whilst there is no objection to the loss of the existing building, its set back into the plot means that it is not overly dominant in views from the street scene.

Since application 211714 was refused, the buildings have been sited further forward in the plot and there has been limited reduction in the depth and of the buildings, noting the single storey flat roof elements to the rear which reduce bulk but not depth.

There has been some improvement in design terms, such as some brick detail on side elevations. However, this is limited.

The proposal has been described as two buildings that incorporate a link. However, the undercroft feature exacerbates the bulk, width and scale of the proposal, the effect of which results in the infilling of the site with a significant amount of built form. Furthermore, the need for the undercroft feature - which cannot reasonably be described as attractive or good design - is symptomatic of the overdeveloped nature of the proposals. The existing undercroft is noted; however, this was constructed a number of years ago and is not considered appropriate for new development. It is also noted that the existing undercroft is set further back in the plot and of a considerably reduced scale than that proposed.

Since application 211714, the overall height of the buildings has been reduced and accommodation omitted from the roof space. However, the eaves would still be significantly higher than immediate neighbouring properties either side (exacerbating the height) and, due to its width and the forward projecting elements, the buildings would be much larger and more bulky. The proposals are still considered to appear overly dominant and not considered to successfully act as a visual transition between the neighbouring properties. The revised NPPF 2023 places greater emphasis on 'beautiful' buildings. The proposals, due to the introduction of inappropriate design and layout elements would be contrary to Policies CC7 and EN7 and the NPPF 2023. Furthermore, the proposed scale and layout would also result in other concerns as set out below.

As can be seen from the proposed site plan, and whilst indicative soft landscaping is shown, there would still be a dominance of built form and hardstanding with little space for meaningful soft landscaping, resulting in overdevelopment of the site. As noted further below, the indicative hedging along the front boundary is positive. However, it would be reasonable to expect tree planting to the frontages, particularly given the sites location opposite Palmer Park and within a 'treed corridor' and the scale and layout of the development needs to provide sufficient space for this.

The combined footprint, scale and bulk would be notably greater than neighbouring properties and the proposal would result in an excessively large, cramped, overdeveloped arrangement in terms of scale and a cramped relationship between buildings and spaces within the site in terms of layout. Whilst the proposed materials would broadly reflect that used in the locality, the materials are not considered sufficient in themselves to create visually interesting buildings or to mitigate the shortcomings of the architecture. The proposals are considered to introduce a dominant form of development within a prominent location which would appear visually incongruous with the adjacent buildings, would not enhance the street scene and nor would it enhance the visual amenities of the adjacent Palmer Park.

There is no objection to the redevelopment of the site. However, in overall terms, the proposal appears overdeveloped with little regard to existing character, or the need to provide

appropriate landscaping. The proposal is not of sufficient high quality design and would not respond positively to its context, contrary to Policies CC7 and EN7. Furthermore, the proposals would not enhance the character of the area or reach the high standards of the Government's 'Build Beauty'. As such, conflict arises with the NPPF 2023 as it seeks to ensure the creation of high-quality, beautiful and sustainable buildings and places; and developments that are sympathetic to local character.

#### Impact on Neighbouring Amenity

Policy CC8 (Safeguarding Amenity) requires developments to not cause a detrimental impact on the living environment of existing properties in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; and Crime and safety.

In relation to No.80 Wokingham Road to the south east, whilst the proposed building Block B would extend to a considerable depth along this boundary, given the distance to No.80 itself, no material overbearing effects are considered to occur. Similarly, whilst there are upper floor windows proposed on the flank elevation facing towards No.80, given these would be secondary windows and could be conditioned to be obscurely glazed, no significant material loss of privacy is considered to arise.

In relation to No. 68 Wokingham Road to the north west as above, whilst the proposed building Block A would be deep along this boundary, given the distance to No.68 itself, no material overbearing effects are considered to occur. Similarly, whilst there are upper floor windows proposed on the flank elevation facing towards No.68, given these would be secondary windows and could be conditioned to be obscurely glazed, no significant material loss of privacy is considered to arise.

No. 1 College Road and its garden is located to the rear of the site for effectively the entirety of the rear boundary. Application 211714 was refused in part due to the overbearing impact the proposal would have on the rear garden of No.1 due to the 3/4 storey height of the buildings at a distance of 13m. Whilst concerns remain about the overdeveloped nature of the proposals, the built form at upper floor levels has been set further away from the rear boundary at a distance of approximately 18m. Whilst clearly visible to the occupiers of No.1 and users of the garden, it is not considered to be so overbearing to warrant a refusal on this basis. However, whilst balconies have been omitted from the scheme since 211714 was refused, there has been an increase in windows which, including on the undercroft feature, span the entire width of the buildings. At a distance of less than 20m (the recommended separation distance under Policy CC8) this is considered to result in both a perception of, and actual, overlooking to this property and its private amenity space and to a limited extent No.3 College Road.

The unacceptable relationships identified above are considered to further demonstrate that the proposals are an overdevelopment of the site. Contrary to Policy CC8.

The construction phase of the proposed development would also have potential to impact on the amenity of surrounding occupiers. Should the application have otherwise been supportable, conditions would have been recommended to secure a submission and approval of a

construction method statement and to control construction hours to mitigate potential noise and dust impacts on the surrounding area.

#### Amenity of Future Occupiers

Policy H5 (Standards for New Housing) seeks that all new housing is built to high standards. Policy EN15 (Air Quality) seeks to protect existing and future occupiers from the impact of poor air quality and Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.

All the proposed units would meet the size standards (some at the minimum) set out in the Nationally Prescribed Space Standards under Policy H5.

Whilst most units are considered to be served by adequate outlook and daylighting, bedroom 2 of flat 2 of Block A and bedroom 2 of flat 1 of Block B would face directly opposite each other at short distance (approximately 5m). The plans (proposed side elevations) indicate that the Block B bedroom window would be obscurely glazed, and the Block A window would have frosted glass. Given these would be the sole windows serving these bedrooms, this is not appropriate and as such there would be unacceptable outlook and daylight serving these bedrooms (noting no daylight report submitted with the application) and given the short distance, combined with undercroft feature, this is considered to be overbearing and oppressive. This would be contrary to Policies CC8 and EN5 and forms a reason for refusal.

A communal garden is proposed at the rear. Whilst this might be acceptable in terms of soft landscaping (expanded upon below), there appears to be no defensible space for ground floor units, resulting in a loss of privacy for occupiers of those units, contrary to Policies CC8 and EN5 and forms a reason for refusal.

Policy H10 deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. "The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity". Para 4.4.87 of the RBLP sets out that "in the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals: (b) Flats outside central Reading: 1 and 2-bedroom: 25 sq m per flat..".

The planning statement indicates that all units would have access to a communal garden area located to the rear of the site. Whilst as an area of soft landscaping this would go some way to softening the appearance of the site (at the rear), it is less likely to be an appealing space for relaxing given its siting immediately adjacent the parking and the parking area of No.80 Wokingham Road immediately to the east. Given the above, combined with the site constraints and proximity to nearby open space (Palmer Park directly opposite) limited amenity space is not considered to warrant a refusal in this instance.

The site is located close to the busy Wokingham Road and a noise assessment has been submitted with the application which has been reviewed by Environmental Protection Officers. The noise assessment submitted shows that the recommended standard for internal noise could be met, if the recommendations from the assessment are incorporated into the design.

However, with windows open the noise levels would be higher than guideline values. The ventilation strategy is yet to be decided although various options are proposed. Should the application have otherwise been supportable, Environmental Protection Officers have recommended conditions to be attached to secure submission and approval of a noise assessment and mitigation scheme prior to commencement of development to ensure an appropriate glazing specification and mechanical ventilation scheme are secured.

An air quality assessment has also been submitted with the application. Environmental Protection Officers are satisfied that this demonstrates that pollutant levels at the new dwellings would be below threshold values such that further assessment or mitigation is not required, and future occupiers would not be subject to poor air quality. Environmental Protection Officers are also satisfied that the air quality assessment demonstrates that the development itself would not detrimentally impact on air quality levels at and surrounding the application site (notwithstanding concerns raised elsewhere in this report in respect of air quality and benefits of tree planting).

A condition would also have been recommended to secure submission and approval of details of the bin storage arrangements for the developments including measures to protect the bins from pests and vermin.

#### Contaminated Land

Policy EN16 (Pollution and Water Resources) required that developments on land affected by contamination can be satisfactorily managed or remediated against so that it is suitable for the proposed use.

The site is adjacent to the site of an historic gravel pit, which has the potential to have caused contaminated land. Should the application have otherwise been supportable, Environmental Protection officers recommend a standard unidentified contaminated land condition (in the event contamination discovered, works to stop and contamination report and remediation scheme to be submitted to LPA).

#### Transport

Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development.

The application site is located along A329 Wokingham Road, opposite Palmer Park. The A329 Wokingham Road has parking restrictions preventing on-street parking and forms part of the Red Route 'no stopping' corridor. A westbound bus/cycle/taxi lane is located across the front of the site. The site currently benefits from two dropped kerb accesses onto the Wokingham Road.

The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

In accordance with the Parking Standards and Design SPD, the development would be required to provide 1no. on-site parking space per 2 bed unit and 1.5 spaces per 3 bed unit. In addition, visitor parking at ratio of 1 space per 10 units would also be required equating to 16 off-street car parking spaces. The Proposed Site Plan shows there would be a total of 10 car parking spaces which is below the Council's adopted standards.

A transport statement has been submitted with the application. Whilst the statement has not been updated to fully reflect the current proposal, the Council's Transport officers are satisfied that it acceptably justifies the proposed parking provision stating that the site is located in a highly accessible location by means of public transport or active travel options. In addition, it is stated that the local highway network is subject to a number of waiting restrictions that preclude the ability for vehicles to park on-street without the necessary permits. The Council's Transport Officer considers this to be suitable justification for the proposed parking provision and it is noted that this did not form a reason for refusal of application 211714. Given the surrounding road network has extensive parking restrictions in place preventing unauthorised on-street parking it is considered that any overflow in parking would not affect the flow of traffic on the classified road network. As the proposal would generate additional pressure for parking in the area, there should be an assumption that any future occupants of the town houses and flats would not be issued with resident or visitor parking permits. Should the application have otherwise been supportable, this would have been secured by way of condition.

The transport statement notes that 2 x cycle storage areas would be provided (one storage space for each unit) to the rear of each of the two blocks. In principle, this is acceptable. However, only one is shown on the site plan located behind parking bays 6, 7 and 8. The type of storage proposed has also not been illustrated. Further details would be required to ensure a suitable layout could be achieved and should the application have otherwise been supportable, this would have been secured by way of condition.

Plans illustrate that the existing vehicle access crossing is to be retained and utilised. Given that the site is served via 2 accesses one will need to be reinstated and realigned with the footway. This would need to be illustrated on the plans. This does not form a reason for refusal, and should the application have otherwise been supportable, this would have been secured by way of condition.

In accordance with Policy TR5, a minimum of 10% of all vehicle parking space within the site should be provided with electric vehicle charging points. Should the application have otherwise been supportable, detailed specification of vehicle charging points and their implementation would have been secured by way of condition.

Whilst the above matters could be dealt with by way of conditions, the Council's Transport officer has confirmed that the following matters pertaining to turning area and waste collection, could not reasonably be conditioned and given the need for potential change to site layout.

All new developments accessed from a classified road would be required to provide a turning area to cater for vehicles that would regularly need to enter the site. Whilst the parking

dimensions conform to the Council's parking standards, the internal layout of the site does not make provision for a turning area for small delivery vehicles, should all the parking bays be occupied.

2 x internal bin storage areas have been illustrated on plans located towards the front of the building for each building block. Bin storage must comply with the Council's Waste Management Guidance and the space in the collection area must be sufficient to enable operatives to return empty bins to a position that does not obstruct the manoeuvring of those containers that are yet to be emptied. The storage areas should be located no further than 10m from the access point of the site to avoid the stationing of service vehicles on the carriage way for excessive periods. Bin collection points have not been illustrated on plans although the planning statement makes reference to kerb side collection.

The Highways Authority have confirmed that given the above concerns, the development would likely lead to the stationing of waste collection/delivery vehicles on the access way or within the inbound bus lane, and/or reversing movements onto a classified road. This would be in conflict with Policy TR3 and forms a reason for refusal.

The construction phase of the proposed development would be likely to impact the surrounding highway network given the prominent location. Should the application have otherwise been considered supportable, a condition would have been attached to secure submission, approval and implementation of a detailed Construction Method Statement.

#### Natural Environment

Policy EN14 (Trees, Hedges and Woodland) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks proposal should include appropriate landscaping. Given that the site is also located within an Air Quality Management Area, is located on a 'treed corridor' (as designated in the Tree Strategy) and is opposite Palmer Park, a significant park and designated 'Local Green Space and Public Open Space', proposals should demonstrate an appropriate level of greening, including tree planting on the frontage.

The site does not contain any existing greenery or vegetation and therefore would not affect any existing trees. Therefore, the proposals represent an opportunity to provide landscaping and tree planting and a net gain in green cover on the site. This is necessary to achieve multiple benefits including visual amenity, ecology, shading, urban cooling, sustainable drainage etc.

A landscape principles statement has been submitted. However, this only indicates that hedging would be provided on the frontage which is insufficient. The statement only briefly mentions trees and hedges but offers no further details. In view of the requirements of the site, tree planting is required on the frontage as well to enhance visual amenity. Hedge planting in itself is positive. However, as confirmed by the Council's Natural Environment Officer, it would need to be a species that would exceed the height of the proposed front wall so that it could be seen and to aid visual softening of the site. Trees and hedging would also aid pollution filtration. It is noted that the building line is also closer to Wokingham Road since application 211714, which further limits space available for meaningful frontage tree planting.

No other landscape principles are mentioned, and this brief level of landscaping detail is not sufficient given the total redevelopment of the site. Other than hedging on the frontage, side and rear are mentioned, which is not sufficient. This is also disappointing given insufficient landscaping formed a reason for refusal of application 211714 and the applicant was advised that a better and more detailed landscape principles plan would be required to demonstrate that appropriate landscaping would be provided.

As above, the proposal offers the opportunity to provide greenery on the site. However, the limited submissions are not acceptable. As such, the proposals fail to provide sufficient required soft landscaping, contrary to Policies CC7, EN14 and the Tree Strategy.

### Ecology

Policy EN12 (Biodiversity and the Green Network) seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable.

A Bat Survey report has been submitted with the application which includes details of a single bat emergence survey undertaken in June 2023. No bats were seen to emerge from the building and the report concludes that the building is unlikely to host roosting bats. Nevertheless, due to the transient nature of bats, it is possible that bats would be present should works commence. As such, the report recommends that non-licensed precautionary measures should be adopted during construction works. The Council's Ecologist agrees with the conclusions of the report, and should the application have otherwise been considered acceptable, this would have been secured by way of condition.

Notwithstanding the above, Policy EN12 states "On all sites, development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible." To demonstrate compliance, as well as with national policy for mandatory Biodiversity Net Gain, the application should be supported by a net gain calculation using the DEFRA 4 metric to demonstrate how a net gain in biodiversity would be achieved. This has not been provided and as such the proposal is contrary to Policy EN12.

Given the nature of the scheme, it would also have been appropriate to ensure that ecological enhancements were provided, namely bird/bat boxes and wildlife friendly landscaping. Should the application have otherwise been considered acceptable, this would have been secured by way of condition.

### Sustainability

Policy CC3 (Adaptation to Climate Change) requires that development proposal incorporate sustainable design practices to take account of climate change and Policy CC4 (Decentralised Energy) states that new development of the scale proposed should include provision of on-site decentralised energy provision where feasible/viable or where existing decentralised energy provision is present within the vicinity of the site connect to this network where feasible.

Policy H5 (Standards for New Housing) requires all major category new build housing to achieve the 'zero carbon homes' standard. The policy goes on to set out that as a minimum development should achieve a 35% improvement over the carbon emission rate set out in Building Regulations with a financial contribution to offset any remaining carbon emissions to zero.

Whilst application 211714 was supported by an energy/sustainability statement, no such information has been submitted with this application (albeit was requested at application stage). On the basis of previous information submitted, and in this specific instance, it is considered likely that the proposal would achieve 35% improvement over the carbon emission rate set out in Building Regulations at the minimum. Should the application have otherwise been supportable, then a s106 obligation would have been required to secure a financial contribution to off-set carbon emissions to zero. However, given the recommendation is to refuse planning permission for other reasons, completion of a s106 legal agreement is not being pursued and lack of such an agreement to off-set carbon emissions to zero represents a further reason for refusal of the application.

#### SuDS

Policy EN18 (Flooding and Drainage) requires all major scheme to incorporate SuDs as appropriate and in line with Government's Technical Guidance.

A SuDs strategy has been submitted with the application. Whilst it is concerning that the document refers to a different address and development when discussing the site location and description, the remainder of the document does relate to the proposal. The Council's LLFA officer has confirmed that this is acceptable in principle. The scheme would include the provision of porous paving and reducing the run-off rate to the greenfield rate which complies with national guidance. Should the application have otherwise been considered acceptable, a condition would have been attached to secure a final SuDs strategy to be designed in conjunction with soft landscaping - connecting tree planting pits with proposed soakaways so that trees and smaller plants could filter surface water within the site which would be appropriate. A condition would also be attached to secure a timetable for implementation and details of management and maintenance of the scheme.

#### Employment Skills and Training

In accordance with the adopted Employment Skills and Training SPD (2013) and Policy CC9 (Securing Infrastructure) a development of this nature and scale is required to demonstrate how it would utilise local labour and contribute to skills and training for local labour in the form of a construction phase employment and skills plan associated with the development. Provision of such plan, or equivalent financial contribution, would be secured by way of section 106 legal agreement should the application have otherwise been considered acceptable. However, given that planning permission is recommended to be refused for other reasons, this represents a further reason for refusal.

#### Community Infrastructure Levy

The proposal would be a Community Infrastructure Levy (CIL) liable development. The applicant has provided the CIL Additional Information Form. If the scheme had been acceptable

an informative would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

#### Matters Raised in Representations

All material considerations have been addressed in the above assessment.

Concern has been raised that the proposed materials have been inaccurately referenced. Should the application have otherwise been supportable, a condition would have been imposed requiring further detail and samples of material to ensure good-quality materials in keeping with the local area.

Discrepancies within the report have been acknowledged by the case officer. It is considered that sufficient information is able to determine the application.

#### Overall Planning Balance and Conclusion

It is acknowledged that there would be some planning benefits associated with the proposed development, such as the provision of 12 residential units to assist with the Borough housing targets. However, there are considered to be a number of significant shortfalls and areas of harm, such as the proposed scale, massing and detailed design deficiencies which results in the proposals being harmful to the character and appearance of the area. In addition, there are significant concerns over the impact on the living accommodation of existing nearby occupiers and for future occupiers. Furthermore, the affordable housing, and sustainability elements are unproven/not agreed, while failure to demonstrate BNG and insufficient landscaping are further shortcomings.

#### **RECOMMENDATION:**

REFUSE Planning Permission for the following reasons:

1. The proposed development, due to the relationship between the plot size and overall scale and plot coverage of the buildings, would result in a cramped overdevelopment of the site which fails to accommodate buildings, parking areas and landscaping in a manner which enhances the character and appearance of the area. As such the proposals are contrary to Policy CC7 (Design and the Public Realm) of the Reading Borough Local Plan 2019 and the NPPF 2023.
2. The proposed development, due to its incongruent and inappropriate design combined with its excessive overall height, bulk and massing and prominent siting would appear overly dominant within the street scene failing to relate appropriately to the surrounding context. For these reasons the proposed development would harm and fail to enhance the character and appearance of the area, including Palmer Park. As such the proposals are contrary to Policies CC7 (Design and the Public Realm) and EN7Ed (Local Green Space and Open Space - Palmer Park) of the Reading Borough Local Plan (2019) and the NPPF 2023.
3. The proposed development, due to the combination of its scale, siting, and the number and position of windows, in close proximity to neighbouring dwellings and private gardens existing to the rear of the site along College Road would result in overlooking and loss of privacy to those dwellings and gardens with consequent harm to the amenity of occupiers. As

such the proposals are contrary to Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan 2019 and the NPPF 2023.

4. Not all proposed units would receive sufficient daylight and outlook due to their internal layout, proposed obscurely glazed windows and overshadowing from the undercroft element. Furthermore, there would be no defensible space between the windows of ground floor units and the communal garden areas, resulting in a loss of privacy. As such, it is considered that the proposal would be harmful to the living environment of future occupants due to substandard accommodation. As such the proposals are contrary to Policies CC8 (Safeguarding Amenity) and H5 (Standards for New Housing) and of the Reading Borough Local Plan 2019 and the NPPF 2023.

5. The proposed development fails to demonstrate acceptable provision of tree planting and soft landscaping with consequent harm to visual amenity, air quality, biodiversity and environmental quality of the area. As such the proposals are contrary to Policies CC7 (Design and the Public Realm), EN7Ed (Local Green Space and Open Space - Palmer Park), EN15 (Air Quality) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Council 2019, the Tree Strategy 2021 and the NPPF 2023.

6. The development has failed to demonstrate that there would be a biodiversity net gain at the site through ecological enhancements either on or off-site. As such the proposals are contrary to Policy EN12 (Biodiversity And The Green Network) of the Reading Local Plan 2019 and the NPPF 2023.

7. The proposed development, by reason of its lack of an appropriate contribution towards the provision of Affordable Housing, and in the subsequent absence of a completed legal agreement to secure an appropriate contribution towards the provision of Affordable Housing, fails to make an appropriate contribution to the housing needs of Reading Borough. As such the proposals are contrary to Policies H3 (Affordable Housing) and CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021 and Planning Obligations under Section 106 2015.

8. In the absence of a completed legal agreement to secure an acceptable Employment and Skills Plan (construction phase only; employment and skills plan, or financial contribution), the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm. As such the proposals are contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the Employment Skills and Training SPD 2013 and Planning Obligations under Section 106 2015.

9. In the absence of a completed legal agreement to secure an appropriate financial contribution towards carbon off-setting in the Reading Borough, the proposal would not acceptably adapt to climate change, achieve zero carbon homes standards and not provide appropriately towards energy infrastructure. As such the proposals are contrary to Policies CC3 (Adaptation to Climate Change), CC9 (Securing Infrastructure) and H5 (Standards for New Housing) of the Reading Borough Local Plan 2019 and the Sustainable Design and Construction SPD 2019 and Planning obligations under S106 SPD 2015.