

DELEGATED PLANNING APPLICATION REPORT

Ward: Battle

App Ref: 231491/FUL

Address: 21 Western Elms Avenue, Reading

Proposals: Proposed construction of three town houses

Case Officer: Marcie Rejwerska

Date received (valid from): 16 October 2023
(ext.)

Target Decision date: 16 February 2024

1. SITE DESCRIPTION

The application site comprises the rear gardens of 19-21 Western Elms Avenue, adjacent to the properties on Ivanhoe Close. The site is bounded by railway tracks to the east. The surrounding area is predominately residential with a mix of two to three storey semi-detached and detached dwellings. The application site is not listed nor within a conservation area. The site is located within the Air Quality Management Area and the east section of the site is located within an identified Green Link.



Aerial view of the site. Image taken from Google Maps on 20/03/2024.

2. PROPOSAL AND SUPPORTING INFORMATION

Planning permission is sought for 3x terraced 4-bedroom townhouses to continue the building line of the existing properties on Ivanhoe Close, with associated parking at the front of the site. The townhouses would be 3 storeys with 3 of the proposed bedrooms contained within the second/loft floor. The properties have been designed to follow

the character of the properties on Ivanhoe Close. Associated landscaping is also proposed at the front and rear of the properties.



Proposed front elevations

Plans considered:

Design and Access Statement, dated October 2023

Ecological Assessment, dated October 2023

Report of UK Habitat Baseline Survey, Arbtech, dated 11/07/23

1314/1/a Location Plans, dated May 2021

1314/20 Proposed Site Plan, dated July 2023

1314/21 Block Plan, dated October 2023

1314/3/c Plots 1-3: Plans and Elevations, received May 2021

Received by the LPA on 16/10/2023

PB/AIA-23/12.21, Arboricultural Impact Assessment, Urban Tree Experts, dated 12/01/24

Received by the LPA on 15/01/24

1314/22 Proposed Landscaping, dated January 2024

Received by the LPA on 02/02/24

3. RELEVANT PLANNING HISTORY

220582 - Construction of three townhouses - Application refused on 22/07/2022

Due to the following reasons:

- Failure to demonstrate that there would be no detrimental impact on biodiversity.
- Failure to demonstrate biodiversity net gain (using DEFRA metric 3.1).
- Failure to demonstrate no harm to important trees on the east side of the site.
- Failure to provide adequate and functional amenity space and risk of poor access to natural light from overshadowing from existing trees.

221710 - Construction of three townhouses - Application refused on 31/03/2023

Due to the following reasons:

- Failure to demonstrate that there would be no detrimental impact to the Green Link or that the need for development outweighs the need to protect the ecological value of the site.

- Failure to demonstrate that there would be no net loss or that a biodiversity net gain would be achieved.
- Failure to demonstrate no harm to existing trees on the east side of the site and the likely future pressure to prune or fell those trees.
- Failure to provide adequate and functional private amenity space as the space would be compromised by overshadowing from existing trees.

4. CONSULTATIONS

Non-statutory:

RBC Transport -

- In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide parking provision of 2 parking spaces for each dwelling. Each parking space should be a minimum of 2.4m x 4.8m with forecourt depths of 6m.
- Submitted plans indicate that a total of 8 parking spaces are to be provided of which 2 are disabled bays and 2 for visitors. A total of 6 parking spaces are required for the 3 dwellings these have been identified on the submitted site plan.
- Dimensions of the parking bays conform to standards; however, the forecourt depths fall short of the recommended 6m depth. Given the existing dwellings located on the opposite side of Ivanhoe have a similar layout and that this is for a short stub and the area of dropped kerb can provide additional width, I am happy that this is acceptable in this instance.
- The proposal seeks to extend the access road and footpath to connect with those already constructed in Ivanhoe Close, which connects to the existing path and roadway in Western Elms Avenue. The width of the access road and footpath are deemed acceptable, however as previously advised in application 220582 and 221710, plans are required illustrating the proposed dropped crossings.
- As a result of recent changes to the Local Transport Plan (TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING). Developments should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport; All new houses with dedicated off-street parking should provide charging points. In view of this, the development must provide 1no. Electric Vehicle (EV) charging point at time of build for each dwelling. Details of this will need to be provided and illustrated on plans.
- In accordance with the Council's Parking Standards and Design SPD, each dwelling should be provided with 2 secure lockable cycle storage spaces. In dwellings of this nature a secure garden shed would be acceptable. Plans identify cycle storage in the rear private garden areas of each proposed dwelling, this is therefore deemed acceptable.
- Bin storage should not be further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods. Bin storage and collection points are required to be illustrated on plans. The Council's waste and Recycling team should be contacted to confirm collection and access arrangements. Tracking diagrams of for a refuse vehicle entering and turning on site will be required.

RBC Natural Environment -

- Previous Natural Environment comments raised an objection due to the need to remove trees off-site (T6 on the AIA) to enable development (unclear how this can be approved without the consent of the trees' owner) and due to the landscaping principles not being demonstrated.

- The latest submission includes a Landscape Plan but still does not address the matter of off-site tree removal. This remains the basis for an objection.
- With reference to the Proposed Landscaping Drg. No. 1314/22 dated January 2024, the following are noted:
- This plan provisions 6 new trees on the frontage, all within or near the driveway and parking areas. The species should be carefully selected for appropriate ultimate size and soil volume availability (which will need to be confirmed). The use of Prunus is not encouraged due to this being the most prolific genus in the borough, hence an alternative should be proposed.
- Some of the new trees/shrubs' names listed in the Key section are misspelled. These should be amended.
- Given the location of the proposed planting, detailed tree pit details must be submitted to demonstrate soil volume availability as well as measures to mitigate conflict between the trees' roots and surfacing.

RBC Environmental Health -

- A noise assessment should be submitted in support of applications for new residential proposed in noisy areas. This site is likely to be affected by noise from the nearby railway line and station.
- The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (may breach the EU limit value for NO2) and introduces new exposure / receptors, in close proximity to a railway line. An assessment and/or mitigation measures should be provided as part of the application.
- Until an assessment and or mitigation plan has been submitted and approved by the Environmental Protection Team it is impossible to determine whether the proposed development is appropriate for the proposed location, therefore until the above has been received I would recommend refusal on air quality grounds or the following condition.
- The development lies directly adjacent to the site of a railway station which has the potential to have caused contaminated land. The proposal may introduce new pollutant linkages between contaminated land and sensitive receptors at the site. The developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action. A contaminated land assessment should be submitted to give an indication as to the likely risks and to determine whether the site is suitable for the proposed use or can be made so by remedial action.

Ecology -

- The application site is an area of land that abuts the railway line in a predominantly urban and residential part of Reading. This application is similar to a previous application 221710 and our previous comments remain and are repeated below:
- The application site is an area of land that abuts the railway line in a predominantly urban part of Reading. The railway corridor and associated vegetation (which the site forms part of) is designated as a green link as per policy EN12.
- It appears to have been previously woodland/ trees. The site has been cleared this appears to be pre-emptive clearance (pre-emptive clearance is when a developer removes vegetation or habitats that they think will impede their development proposal by limiting the amount of space available for development).
- It is likely to have had substantial ecological value as there are few trees in this part of the borough and it would have been a valuable part of the green network.
- The proposals will result in the loss of biodiversity units as measured using the DEFRA 3 metric. The fact that the site has been cleared does not alter this as National

Planning Policy Guidance and the user guide for the DEFRA 3 states that the baseline needs to be the undegraded site prior to clearance.

- Development of this site is would therefore not comply with Policy EN12 which reads: “The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network” If the developer were to conclude that these losses could be offset (at an alternative site), unless there were “exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site “ (as required by EN12) - which there are unlikely to be as there are alternative sites for housing - then the proposals would still not comply with the mitigation hierarchy as set out in policy EN12.
- [The submitted Ecology] statement however does not address our concerns and our comments and as such our advice remain the same. Unless there were “exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site “(as required by EN12) - which there are unlikely to be as there are alternative sites for housing - then the proposals would still not comply with the mitigation hierarchy as set out in policy EN12.

Public:

The following addresses were consulted by letter.

25A Western Elms Avenue, Reading, Berkshire, RG3 2AL
25 Western Elms Avenue, Reading, Berkshire, RG30 2AL
25C Western Elms Avenue, Reading, Berkshire, RG30 2AL
25b Western Elms Avenue, Reading, Berkshire, RG30 2AL
3 Wood Green Close, Reading, RG30 2AW
7 Wood Green Close, Reading, RG30 2AW
9 Western Elms Avenue, Reading, RG30 2AL
21 Western Elms Avenue, Reading
23 Western Elms Avenue, Reading, RG30 2AL
15 Western Elms Avenue, Reading, RG30 2AL

Letters of representation have been received as follows:

3 objections relating to:

- Incorrect address on the application form.
- Future competition for parking space resulting from potential conversion to self-contained flats.
- No significant improvement in biodiversity matters from previous applications.

A site notice was also displayed on site.

5. 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) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

National Policy and Guidance

National Planning Policy Framework
National Planning Practice Guidance

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

EN12: BIODIVERSITY AND THE GREEN NETWORK

EN14: TREES, HEDGES AND WOODLAND

EN15: AIR QUALITY

EN16: POLLUTION AND WATER RESOURCES

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

TR1: ACHIEVING THE TRANSPORT STRATEGY

TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

SPD

Affordable Housing (2021)

Revised Parking Standards and Design (2011)

Planning Obligations Under S106 (2015)

Sustainable Design and Construction (2019)

Equality Act 2010:

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.

APPRAISAL

Land use principles

Paragraph 123 of the NPPF states *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”.*

The definition within the NPPF states that brownfield land (previously developed land) is defined as: *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”* The definition excludes residential gardens.

The development would therefore need to be assessed in terms of the requirements of the NPPF paragraph 72 that seeks to ensure that policies are set out to resist inappropriate development of residential gardens. Also, at local level, the Council's Local Plan (Policy H11) establishes a number of criteria against which applications for the development of private residential gardens need to be assessed

Proposals for new residential development that includes land within the curtilage or the former curtilage of private residential gardens will be acceptable where:

1. *The proposal makes a positive contribution to the character of the area in terms of:*
The relationship of the existing built form and spaces around buildings within the surrounding area;
 - *A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and existing pattern of openings and boundary treatments on the site frontage;*
 - *Providing appropriate hard and soft landscaping, particularly at site boundaries. This includes features such as the variety of trees, hardstanding/lawns and hedges, etc.;*
 - *Compatibility with the general building height within the surrounding area;*
 - *The materials and elevational detail. These should be high quality, and where appropriate distinctive and/ or complementary;*
 - *The arrangement of doors, windows and other principal architectural features and their rhythm between buildings. Discussed later in the report.*
2. *The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking; Discussed later in the report.*
3. *The proposal includes access, which meets appropriate highway standards; Discussed later in the report.*
4. *The proposal does not lead to tandem development; The proposal does not lead to tandem development as the proposed dwellings are located to the side of the existing building line on Ivanhoe Close and will utilise the existing spur road for access.*
5. *The design and layout minimises exposure of existing private boundaries to public areas, and avoids the need for additional physical security measures; Discussed later in the report.*
6. *The proposal does not cause a significant detrimental impact to the amenity of adjacent and nearby occupants; Discussed later in the report.*
7. *The emphasis is on the provision of family-sized housing; Proposal is for 3x 4-bedroom properties.*
8. *The development provides biodiversity net gain wherever possible, and would not have an adverse impact on biodiversity in terms of the fragmentation of blocks of gardens which as a unit or in association with adjacent green space are deemed to make an important contribution to biodiversity and contribute to the green network; and Discussed later in the report.*
9. *The proposal does not prejudice the satisfactory development of a wider area.*

It is not considered that the proposed development would prejudice the satisfactory development of the wider residential area, which consists largely of family sized homes.

There is also no in principle objection to the proposed development, provided the development complies with the policies set out within the Reading Borough Local Plan, which will be discussed further within this report.

Design

Policy CC7 of the Reading Borough Local Plan requires all development to be of high quality design and maintain and enhance the character and appearance of the surrounding area. In this specific case; this concerns the following components:

- Layout
- Landscape
- Scale: height and massing; and
- Architectural detail and materials

The application is also subject to the relevant criteria of Policy H11 as outlined above.

The proposed development seeks to replicate the design of the existing dwellings along Ivanhoe Close. Three four-bed dwellings are proposed at three storeys. In terms of the development's interaction with the built environment, the scheme is considered to integrate well with existing architectural detailing of buildings along Ivanhoe Close, as well as the scale and massing of nearby dwellings.

The proposed dwellings are set 2m forward from the established building line on Ivanhoe Close, however, this is not considered harmful to the rhythm or pattern of development in this location. Over 7m is maintained at the front of the properties for provision of allocated parking spaces and some minimal landscaping. The back to back distance from the rear façade of 19 and 21 Western Elms Avenue and the front façade of the proposed dwellings is in excess of 35m.

The overall layout of the development for the most part follows the pattern of development along Ivanhoe Close and is generally considered acceptable. The proposed dwellings are not considered to harm the character and appearance of the surrounding area. In accordance with Policies CC7 and H11 of the Reading Borough Local Plan, the proposed is considered to respond positively to the local context, in particular 1 to 5 Ivanhoe Close. Where the development falls short, however, is the limited landscaping principles which is discussed later in the report.

Standards for new housing

As this application seeks three new dwellings, policy H5 (Standards for New Housing) of the Reading Borough Local Plan is relevant.

Policy CC3 (Adaptation to Climate Change) requires that development proposal incorporate sustainable design practices to take account of climate change. Policy H5 (Standards for New Housing) requires that all new housing is be built to the higher level of water efficiency standards under Building Regulations and achieves at a minimum a 19% improvement in the dwelling emission rates above the Building Regulations standards and details of this in the form of design and construction stage SAP reviews can be secured by way of conditions.

The proposed dwellings exceed the minimum gross internal floor areas and storage requirements as set out in policy H5 of the Reading Borough Local Plan. The gross internal floor space of each of the proposed new dwellings is approx. 140m², which is above the minimum space requirement of 121m² for a four bed, seven-person, three storey dwelling.

Therefore, the proposed development is considered in accordance with policy H5 of the Reading Borough Local Plan.

Safeguarding amenity

This proposal has also been assessed against Reading Borough Local Plan policy CC8: Safeguarding Amenity, which states that proposals are acceptable where they will not cause a detrimental impact on the living environment of existing residential properties with regard to:

- Privacy and overlooking
- Access to sunlight and daylight
- Visual dominance and overbearing effects of a development
- Harm to outlook

The submitted plans demonstrate a separation distance of 2.16m between the proposed properties and 5 Ivanhoe Close; there would be no harmful loss of light to habitable rooms, particularly at number 5 which is closest to the development. The 45 degree line taken from the nearest habitable room window at number 5 is not infringed upon by the proposed development. There are side windows proposed on all floors which do not serve habitable rooms; should this application have been found to be acceptable it would be reasonable to condition these windows to be obscure glazed to prevent overlooking and loss of privacy to neighbouring properties. The proposed fenestration layout on the front elevation is not considered to pose a risk of harm to neighbouring properties as appropriate separation distances are achieved with 19 and 21 Western Elms Avenue. Similarly, the proposed fenestration layout is considered to provide adequate access to natural sunlight/daylight; concerns have been previously raised with regards to potential overshadowing from existing trees which line the railway tracks on the east side of the plot, however, the building line has been moved forward and overshadowing to habitable room windows is not considered to be an issue in this case.

Overall, there are minimal concerns in relation to amenity of neighbouring residential properties nor the future occupiers of the proposed development.

Private and communal outdoor space

This proposal has also been assessed against Reading Borough Local Plan policy H10: Private and Communal Outdoor Space, which states that:

- *Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.*
- *The design of outdoor areas will respect the size and character of other similar spaces in the vicinity, clearly identify whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.*

The proposed private outdoor amenity spaces (rear gardens) for each plot measure 114m², 87m² and 106m², however, approximately half of this space to the east of the site is reserved for a reptile habitat. It is unclear if this area will be accessible for future occupiers and if it will form part of the rear gardens. This is a similar arrangement to the existing properties on

Ivanhoe Close where the east portions of the rear gardens provide a reptile habitat, and form part of the useable amenity space. The rear garden provision is therefore considered adequate in terms of space alone and roughly follows the pattern of layout of other residential properties in the vicinity. There is however, concern of overshadowing from existing mature trees to the south of the site into the rear gardens, particularly the southern-most plot - this could increase future pressure to prune or fell those trees. Impact on existing trees is discussed further in the next section of this report.

Trees, landscaping and ecology

Paragraph 036 of the NPPG includes considerations for biodiversity net gain on sites where there has been pre-clearance or degradation. The application site was subject to 'unauthorised degradation' in 2019. The NPPG defines 'unauthorised degradation' as any degradation not related to a previous planning permission. It further states *"If there has been degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it."*

It has been acknowledged in this application and earlier refused applications that the site prior to the unauthorised clearance contained a number of mature trees which likely had a substantially high ecological value due to the site being in the ward with the lowest canopy cover in the borough, and its connection to the identified Green Network. The submitted baseline ecological survey has not taken this into account, and only presents the account of the site at present as having little value. In the context of this, officers have decided to assess the application in the context of the likely high ecological value of the site prior to clearance, which was more than likely completed in anticipation of residential development of the site. No biodiversity metric calculations have been provided to demonstrate pre- or post-development habitat values. A submitted ecology statement makes reference to biodiversity enhancements proposed falling short of a value not provided, and requests to off-set the loss through off-site compensation.

Policy EN12 outlines the hierarchy of biodiversity interventions in planning:

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.

Development should:

- Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity.

Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.

The above hierarchy has not been followed and no data using the relevant DEFRA metric has been provided. It is therefore unclear what the pre- and post-development values are and what the apparent biodiversity loss is. While some enhancements and landscaping are proposed, these are not adequate to avoid or mitigate the ecological harm. The proposal has not demonstrated that the harm has been adequately addressed on-site, and therefore does

not qualify to reach the point where off-site compensation may be considered. In addition, the public benefit of the proposal is not considered to outweigh the likely ecological harm of this proposal - the application site is not brownfield land, is a limited provision of housing and provides no on site affordable housing.

The development is therefore not in accordance with Policy EN12 of the Reading Borough Local Plan, criteria 8 of Policy H11 of the Reading Borough Local Plan, and paragraph 186 of the NPPF.

Furthermore, Policy EN14 of the Reading Borough Local Plan states “New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained”.

At the time of issuing this decision notice, an amended Arboricultural Method Statement was submitted by the applicant which outlines the removal of a group of Category B trees outside of the application site, which line the railway tracks. This was queried and the Arboricultural consultant instructed by the applicant confirmed this was an error and no removal was necessary for this development. However, a contradicting email was received from the applicant which suggests that these trees may have already been removed. At this stage, it is not clear whether further unauthorised clearance, in addition to that having been completed in 2019, has taken place. Unnecessary removal of any trees has not been justified and would not be considered appropriate.

The proposed landscaping plan includes the planting of 6 new trees at the front of the site near areas of hard surface and parking. The Natural Environment team have subsequently requested further information regarding soil volumes and tree pits to ensure this proposal is viable. This information has not been received yet at the time of this report, however, is not considered appropriate to form a reason for refusal, as landscaping could be reasonably conditioned.

Transport

As per the Transport Development Control team’s consultation feedback there are no principle objections to this development from a highways perspective, however, additional information was required in order to be policy compliant. This includes electric vehicle charging points and bins storage and collection points. While this information has not been submitted, it is not considered appropriate for this to form a reason for refusal as these details could be secured by condition.

Affordable housing

In accordance with Policy H3 of the Reading Borough Local Plan; “Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading:

- (...) on sites of 1 - 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.”

Given that planning permission is to be refused for other reasons a section 106 has not been drafted and therefore this would amount to an additional reason for refusal of the planning application.

CIL

The proposal includes the creation of more than 100sqm of new floor space and so would be CIL liable.

Conclusion

The proposal has been assessed against the adopted policies as outlined above and is considered contrary to Policies EN14 and EN12 of the RBLP and is therefore recommended for refusal.

RECOMMENDATION

REFUSE

Due to the following reasons:

1. The proposal has failed to demonstrate the impact on the ecological value of the site, and that there would be no net loss in biodiversity. The application has failed to correctly establish the baseline ecological value of the site prior to pre-clearing and has failed to demonstrate that there would not be detrimental impact to the ecological value of the site nor the Green Network. The proposal has also failed to demonstrate whether the biodiversity harm could be avoided or mitigated. The proposal is therefore contrary to Policies H11, EN12 and EN14 of the Reading Borough Local Plan 2019.
2. In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough. The proposal is therefore contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021.