

Planning Department
Reading Borough Council
Civic Offices, Bridge Street Plaza West
Bridge Street
Reading, RG1 2LU

Ref. JL-BS I 402

BY E-MAIL

16 April 2024

Dear Sir or Madam,

RE: LAND AT QUEENS ROAD, CAVERSHAM, RG4 8DN
FP APPLICATION: TWO NEW RESIDENTIAL DWELLINGS
COVERING LETTER: SUPPORTING PLANNING INFORMATION

This Covering Letter: Supporting Planning Information, prepared by JLA ("Agent"), is submitted to Reading Borough Council ("Council"), on behalf of Gravitas Property Group Ltd ("Applicant"), in support of new residential dwellings at Land at Queens Road, Caversham, RG4 8DN ("Site").

This Full Planning Application ("Application") seeks confirmation from the Council for the: *"Construction of 2 x 3-bed / 5-person residential dwellings with associated parking, access, refuse storage and landscaping"*.

The contents of this letter is as follows:

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1. INTRODUCTION

i. Executive Summary

The previous planning application LPA 230844/FUL for 3no three bed, 5-person residential dwellings with associated parking and utilities was refused for a number of reasons as detailed earlier in this section. The new proposals submitted have addressed these concerns as follows:

- **Cue from Architectural Character of the Area:** It is proposed to provide 2no three bed, 5-person residential dwellings reducing scale and site coverage by more than a third. The layout of the residential units align with Mill Road and Coldicutt Street urban grain pattern which provides a more enhanced relationship with the character of the area.

- **Providing Amenity for Future Occupiers:** The development proposals have reduced from a terrace of 3 residential units to 2 within a semi-detached unit. By reducing the built footprint by more than a third and by building over part of the car parking, the site landscape coverage has been significantly increased to provide more than the minimum amenity space policy requirements.
- **Respecting the Privacy to Neighbouring Amenities:** In realigning the proposals with Mill Road, the relationship with the rear of the properties along Coldicutt Street is now back-to-back. A back-to-back distance of 20 metres between dwellings is usually appropriate; however, this will be determined based on on-site circumstances and in some cases, a closer distance may be acceptable without a detrimental effect on privacy. Nonetheless the proposed first floor windows are greater than the usual appropriate distance of 20m and are 24.8m and 28.8m from the rear first floor windows of no 114 Queens Road and 36/ 38 Coldicutt Street respectively. This will ensure that neighbouring dwellings and rear private gardens privacy are retained.
- **Sequential Testing of Flood Risk:** A new Flood Risk Assessment, Sequential and Exception Testing including Drainage Strategy has been submitted with this Application.
- **Biodiversity Provision:** Reading Borough Local Plan (Adopted November 2019) does not have a 10% net gain requirement and it states no net loss in biodiversity. Therefore, only an ecologically sensitive landscape scheme and /or biodiversity enhancement scheme would be required for this development as it is classified as a small development and not part of mandatory BNG. We consider this could be conditioned. Furthermore, considering the poor quality of the 'car park', it considered that the scheme provides significant opportunity to introduce soft landscaping and biodiversity enhancements.
- **Affordable Housing Provision**

Please refer to the supporting Viability Report prepared by AGA and, if necessary, a legal agreement will be agreed to secure an acceptable contribution towards the provision of Affordable Housing.

Policy H1 of the Reading Borough Local Plan highlights a need for at least an additional 15,847 new homes within the Borough between 2013 and 2036, which is equivalent to 689 new homes per annum. Paragraph 4.4.1 of the Local Plan also outlines that there is a pressing need for additional housing in Reading and the surrounding area. The proposed development would contribute to meeting the Council's housing target, whilst also providing new residential accommodation where there is a clear demand.

The proposed development is of a height and scale that is consistent with the character of the surrounding area that is broadly comprised of a mixture of detached, semi-detached, and terraced dwellings. Similarly, the plot widths and sizes are reflective of those along Queens Road, ensuring that the new dwellings will exhibit a similar urban grain and will sit comfortably within the existing urban context.

Each of the proposed dwellings will comply with the Nationally Described Space Standards and will be provided with generous private amenity space in the form of rear gardens. Following the receipt of pre-application advice, the proposed semi-detached houses have been realigned and the rear gardens extended to ensure that maximum levels of daylight are received by the windows on the rear facades of the houses. The alignment of the proposed houses also safeguards the root protection zones of existing trees.

The proposed dwellings have also been orientated in a manner which will ensure that existing levels of privacy and outlook are maintained by occupants of the existing residential properties along Queens Road and Coldicutt Street.

The planning application is supported by a range of technical and specialist assessments, including (but not limited to) arboriculture, transport, drainage, and landscaping. These specialist reports have helped to inform the design development process, thereby resulting in a scheme which is sensitive to its surroundings and the environmental complexities of the adjoining lands.

In summary, we consider that the proposed development accords with the relevant adopted planning policies and associated guidance at the local and national level. We would also respectfully submit that the proposed development is consistent with the principles of proper planning and sustainable development, and that planning permission should be granted.

ii. Full Planning Application Package

This letter should be read in conjunction with the following documents:

- Completed Application Forms including CIL Questions prepared by JLA
- Flood Risk Assessment including Sequential and Exception Test prepared by Syntegra Consulting
- Daylight and Sunlight Report prepared by Syntegra Consulting
- Energy Strategy Report prepared by Syntegra Consulting
- Transport Statement prepared by Kronen Limited
- Viability Report prepared by AGA
- Evidence of Use (1 of 4) prepared by the Applicant
- Tree Constraints Plan including Tree Schedule prepared by Crown consultants
- Design and Access Statement prepared by CDP Architects
- Drawings prepared by CDP Architects comprising:
 - PL-01 – Proposed Block Plan
 - PL-02 – Existing Site Plan
 - PL-03 – Proposed Site Plan
 - PL-04 – Proposed Floor Plans
 - PL-05 – Proposed Elevations
 - PL-06 – Proposed Street Elevations
 - PL-07 – Proposed Bike & Refuse Store for Each Plot
- Decision Notice – 230844/FUL
- Delegated Report – 230844/FUL

The Applicant has paid the Application Fee.

2. BACKGROUND INFORMATION

i. Site Location & Description

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

The Site relates to a parcel of land located on the north side of Queens Road, on the corner with Mill Road to the east. The land is adjacent the rear gardens of No's 114 Queens Road and No's 36-38 Coldicutt Street to the west. The Site appears to have been used as an informal car park, utilising a vehicle entrance from Mill Road. There are some self-seeded grasses on the Site and gravel. There are no elements of hardstanding.

Google Map: View of the Site from Queens Road



Google Map: View of Site from Mill Road



ii. Context

Caversham is a suburb of Reading stretching from the River Thames up to the lowest reaches of the Chiltern Hills. Named areas include Emmer Green, Lower Caversham, Caversham Heights, and Caversham Park Village. The Site sits within Lower Caversham that has no formal boundary, but the name usually refers to the part of Caversham situated on lower ground to the east of central Caversham, close to the river Thames.

Google Map: Aerial Photograph of the Site & Surrounding Area



The area comprises of primarily residential development with some light industrial units located to the east. Services within the area include several primary schools and nurseries, Tesco Extra, bars and restaurants, children's centre, doctor's surgery, a range of different shops, and multiple recreational grounds and parks.

Several of the rear gardens on the east side Mill Road near the Site have large rear outbuildings and contain many vehicles resulting in a crowded streetscene that detracts from the character and appearance of the area.

To the south of the Site is large green area, Christchurch Meadows, and the River Thames. To the north, east and west of the is more residential development.

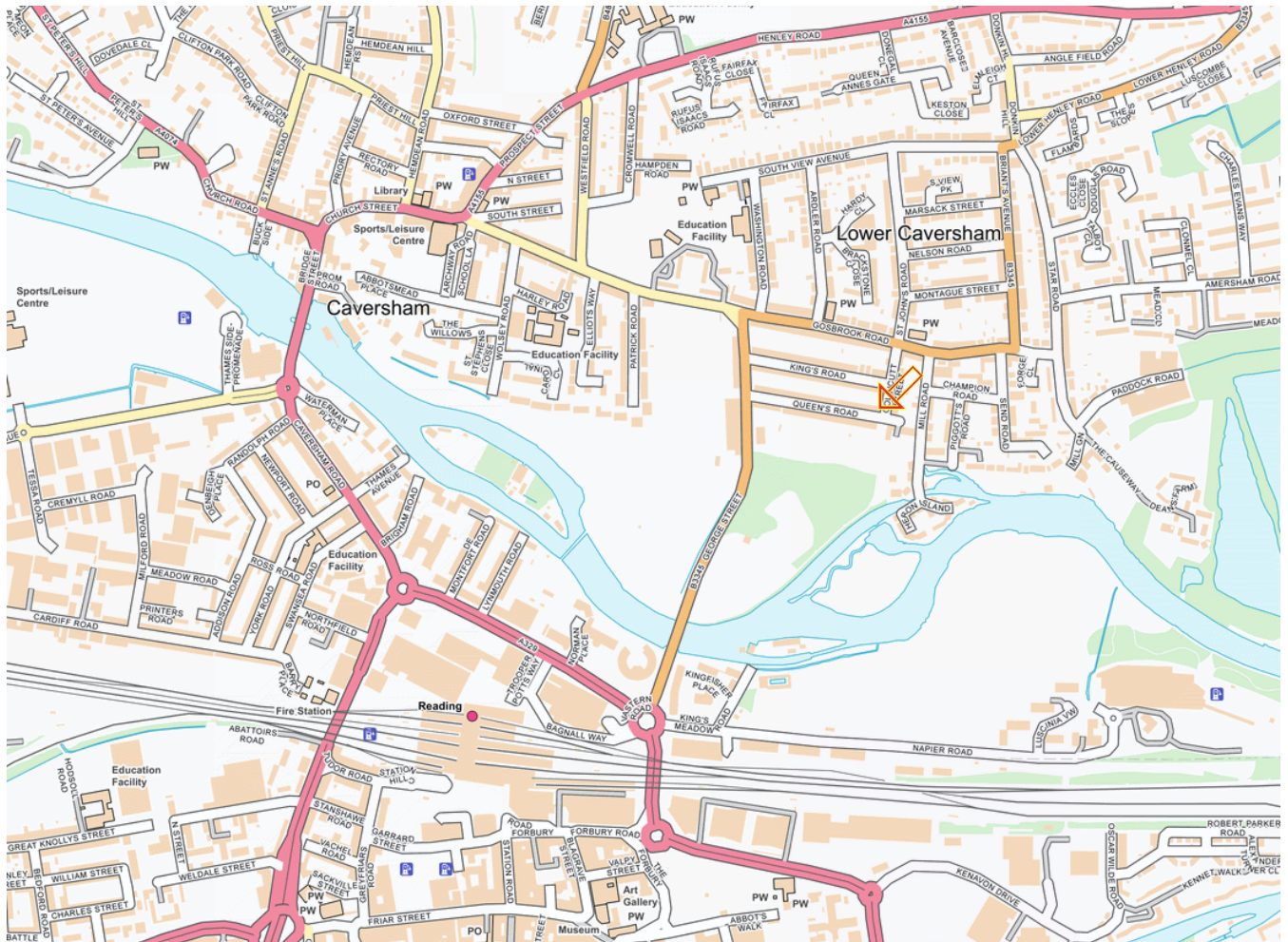
Heritage Assets

The Site is not designated within a Conservation Area.

Transport & Accessibility

Please refer to the supporting Transport Statement prepared by Kronen Limited.

Street Map

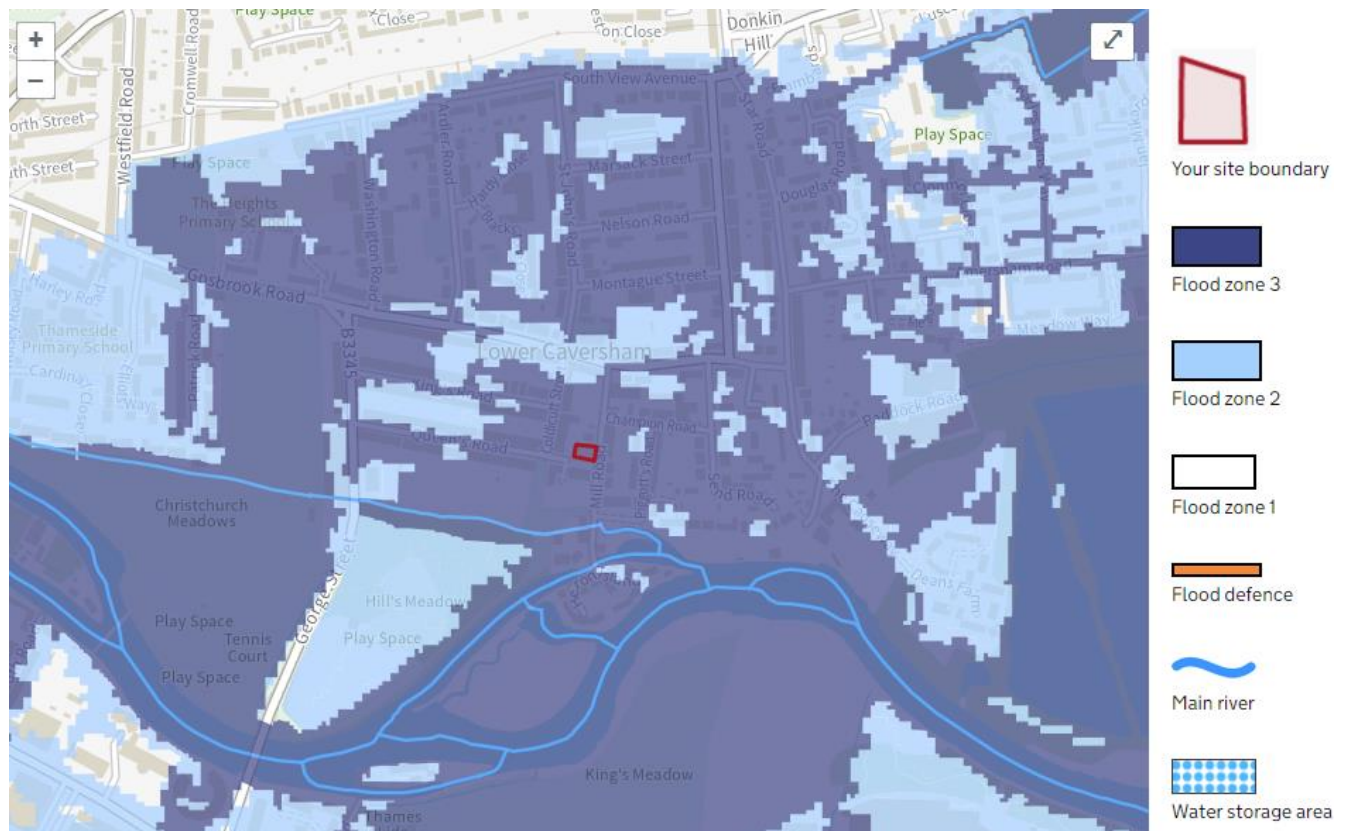


Flood Risk

Please refer to the supporting Flood Risk Assessment including Sequential and Exception Test prepared by Syntegra Consulting.

The Site is located within Flood Zone 2 / 3 (a chance of a chance of flooding from rivers or seas of 1% - 3.3%+) and has a medium risk of flooding from surface water (a chance of flooding of between 1% and 3.3%).

EA Flood Risk Map for Planning



iii. Planning History

A planning history search of the Site has been undertaken by making use of the online property search engine on the Council's website.

More recently, a Full Planning Application (No. 230844/FUL) was refused for the construction of 3 x 3-bed / 5-person residential dwellings with associated parking, access, refuse storage and landscaping.

97-00170-FUL New detached bungalow. Refused and Dismissed at Appeal.

91-0616 Erection of a pair of semi-detached houses. Refused and Dismissed at Appeal.

90-0467 Erection of four flats. Refused and Dismissed at Appeal.

88/TP/437 Erection of one pair of semi-detached chalet bungalows. Refused.

87/TP/728 Erection of one pair of semi-detached chalet bungalows. Refused.

86/TP/1268 Erection of three dwellings. Refused.

Planning History: Nearby Sites of Relevance

Of note:

129 Queens Road

- Ref. 101163 - Erection of 11 no. 2-bed flats following part implementation of outline planning approval 03/01251/OUT and approved matters approval 07/01642/REM – Approved 22/07/2010

34, 36 & 36a Mill Road

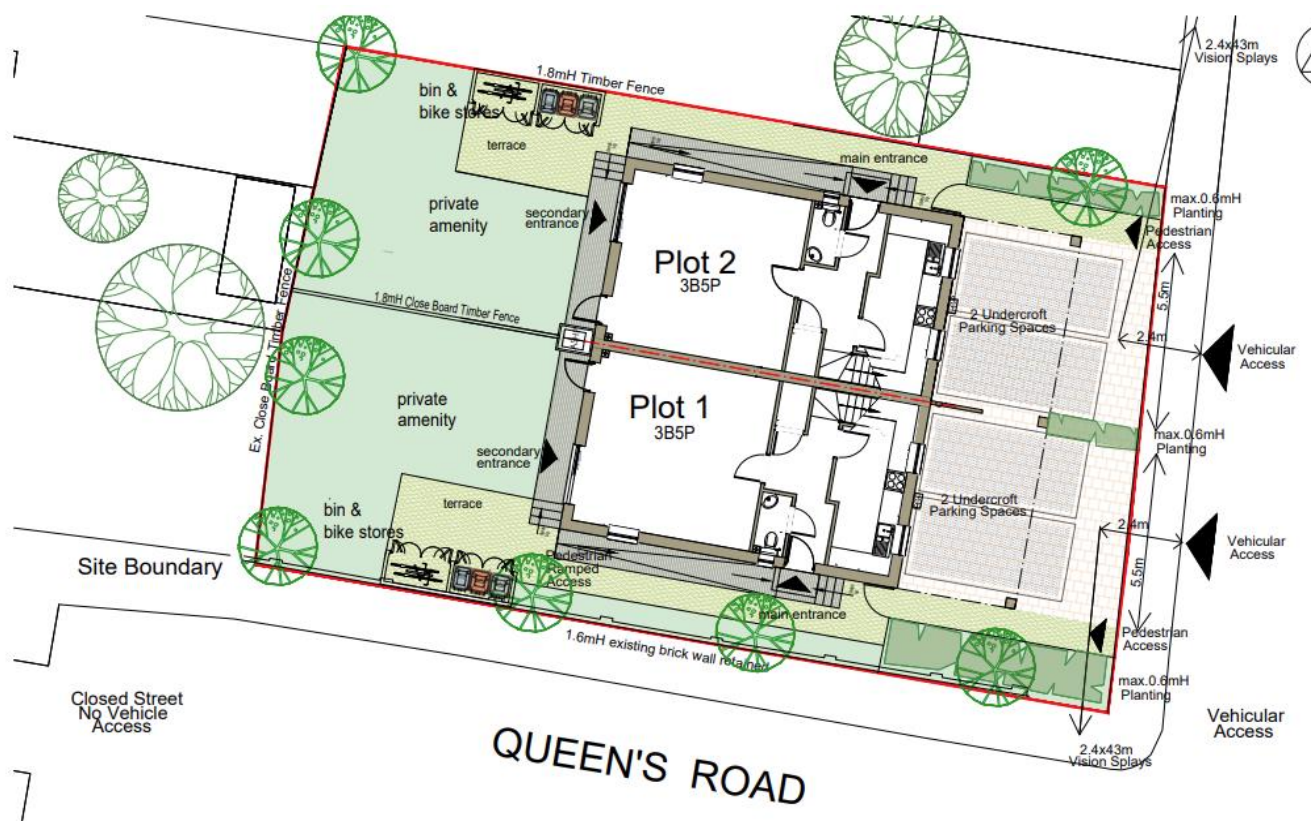
- Ref. 210206 - Single storey front and two storey side and rear extension at 34 Mill Road. First floor rear extension at 36 Mill Road. Single storey front and rear and two storey side extension at 36A Mill Road. Refused and Dismissed at Appeal

3. THE PROPOSAL

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

The Proposal is for the: *"Construction of 2 x 3-bed / 5-person residential dwellings with associated parking, access, refuse storage and landscaping"*.

Dwg No. PL-03 – Proposed Site Plan



Dwg No. PL-05 – Proposed Elevations



4. RELEVANT PLANNING POLICY

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'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2023 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

i. Reading Borough Local Plan, November 2019

The Local Plan was adopted in November 2019 and sets the policies for development in Reading up to 2036. It pre-dates the most recent revision of the National Planning Policy Framework ('NPPF'), updated in July 2021. Whilst not replacing the Development Plan as the starting point for decision-taking, this provides the most up-to-date planning policy guidance, therefore an important material consideration.

The relevant policies include (but are not limited to):

- CC1 - Presumption in favour of sustainable development
- CC2 - Sustainable Design and Construction
- CC3 - Adaption 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
- 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

ii. Reading Borough Online Proposals Map



There are no policy designations of note in place on the Site. However, the Site is located within close proximity to Thames Valley, a designated Major Landscape Feature, Hills Meadow, a Local Green Space and an Air Quality Management Area.

iii. Reading Supplementary Planning Documents ('SPD's') / Guidance ('SPG's')

The Council has several SPD's that are other relevant material considerations against which this planning application should be determined:

- Sustainable Design & Construction SPD (December 2019)
- Revised Parking Standards and Design SPD (October 2011)
- Planning Obligations under Section 106 SPD (April 2015)
- Affordable Housing SPD (March 2021)
- Tree Strategy for Reading (March 2021)

iv. Other Policy / Guidance

- National Planning Policy Framework (NPPF, 2023)
- Technical Housing Standards – Nationally Described Space Standard (DCLG, 2015).
- National Planning Policy Guidance (NPPG)

5. PLANNING CONSIDERATIONS

The main planning considerations are:

- Principle of Development
- Design and Impact on the Character and Appearance of the Area
- Impact on Existing and Future Occupiers
- Amenity Space
- Transport & Parking
- Landscaping, Trees and Ecology
- Sustainability
- Affordable Housing, S106 and CIL Obligations
- Density and Housing Mix

i. Principle of Development

The proposed development comprises the construction of two new residential dwellings (Use Class C3), together with car parking, cycle parking, landscaping, and associated works. The proposed development will, therefore, provide for a net increase of houses.

Policy H1 of the Reading Borough Local Plan highlights a need for at least an additional 15,847 new homes within the Borough between 2013 and 2036, which is equivalent to 689 new homes per annum. Paragraph 4.4.1 of the Local Plan also outlines that there is a pressing need for additional housing in Reading and the surrounding area. The proposed development would contribute to meeting the Council's housing target, whilst also providing new residential accommodation where there is a clear demand.

The provision of new homes on small to medium sites is also supported by the NPPF, with

Paragraph 69 highlighting the important contribution that these sites can make in meeting the housing requirements of an area. It goes on to state that local authorities should identify sites to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

While the Site has been used as a car parking since March 2020, the proposal must still be assessed for its suitability in terms of the design criteria within Policy H11 of the Local Plan:

- 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.*

The layout and design of the proposed development has taken cues from the surrounding area. Plot widths, building heights, separation distances and the orientation of dwellings are reflective of the existing plots and dwelling houses Mill Road. The proposed plots are generally long and narrow and will contain two-storey dwellings with a small setback from the street frontage and generous rear gardens. In this regard, the proposed development exhibits a similar urban grain to that of the surrounding area.

Hard landscaping is proposed within the Site in the form of tarmac and brick paving in a manner that differentiates between vehicle and pedestrian areas. A significant amount of soft landscaping is also proposed to provide greening within the Site, whilst also creating new opportunities for biodiversity.

- 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;*

As highlighted above, the layout of the proposed development is reflective of existing plot sizes in the area. The proposed development comprises two dwellings on a site area of 0.0413 hectares, which is at the lower end of the density range identified in the Local Plan.

- 3) *The proposal includes access, which meets appropriate highway standards;*

The proposed access remains in line with the pre-application scheme which the case officer considered to be acceptable.

- 4) *The proposal does not lead to tandem developments;*

The application site does not provide an opportunity for tandem development to the front or to the rear of the proposed dwellings.

- 5) *The design and layout minimises exposure of existing private boundaries to public areas, and avoids the need for additional physical security measures;*

The majority of the Site is setback from Mill Road and, as such, it is not in an area that is utilised by the public. Whilst the rear gardens will back onto Queens Road they will be fully secured by perimeter fencing.

- 6) *The proposal does not cause a significant detrimental impact to the amenity of adjacent and nearby occupants;*

The Site provides a sufficient amount of space to allow for the new dwellings to be set back substantially from the rear gardens of the existing dwellings Coldicutt Street. The proposed Semi-detached dwellings would sit approximately 24+ metres north of the existing rear boundaries, which is considered a sufficient distance to avoid any impacts on the amenity of neighbouring occupiers.

- 7) *The emphasis is on the provision of family sized housing;*

The proposed development comprises 2 no. five-bedroom houses all of which are family-sized homes. Moreover, the proposed dwelling houses meet and exceed the minimum floorspace requirements set out in the Nationally Described Space Standards, which means that a high quality of residential accommodation is being proposed to serve the intended family needs of the future residents.

- 8) *The development provides biodiversity net gain where 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;*

The proposed development will include a significant amount of planting and the use of wildflower grasses to provide greening to the Site and create opportunities for new habitats and biodiversity. In this regard, the landscaping scheme provides careful consideration of opportunities to achieve a biodiversity net gain.

- 9) *The proposal does not prejudice the satisfactory development of a wider area.*

The proposed dwellings are also orientated in a manner that would allow for the continuation of the new street, which could be achieved along the same building line.

Having regard to the above points, we would submit that that the principle of residential development on the Site is acceptable and in line with the Council's aspirations. Furthermore, it has been demonstrated that the proposals represent a suitable form of development, in accordance with Policy H11 of the Local Plan.

ii. Assessment Against the Council's Reasons for Refusal (Ref. 230844/FUL)

Design & Impact on the Character & Appearance of the Area

The Council's reasons for refusal were as follows:

1. The proposed development, due to its prominent siting, excessive scale, site coverage, layout and insufficient landscaped areas would represent a cramped overdevelopment of the site which fails to accommodate built form, parking areas and landscaping in a manner that enhances the character and appearance of the area. The resultant plots would have uncharacteristic plot sizes, with the siting and layout being at odds with the established urban grain. As such the proposal would be harmful to character and appearance of the street scene and wider area. The proposal is therefore contrary to Policies CC7 and H11 of the Reading Borough Local Plan 2019.

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

Policy CC7 of the Reading Borough Local Plan 2019 states: *"All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located."*

The prevailing character of the area comprises red brick terrace row housing with some lighter brick detailing, large bay windows and pitched grey slate roofs. In addition to this typology, there are examples of other housing forms and styles, including 114 Queens Road which is a large, side facing white rendered house, and Nos. 32 – 36 Mill Road which are semi-detached residential dwellings.

The Design Team has carefully considered the relationship of the proposed development with its surroundings and sought to design a proposed scheme, which is sensitive to the existing context. The proposed dwellings are two storeys with pitched roofs, which follow the existing topography of the site to reduce the perceived height and mass when viewed from Mill Road, thereby ensuring that the new dwellings will not become overly dominant or intrusive within the proposed dwellings in the terraces follow the existing topography of the site to reduce the perceived height and mass when viewed from Mill Road, thereby ensuring that the new dwellings will not become overly dominant or intrusive within the street scene.

The height of the development would be kept at two storeys, including habitable accommodation in the roofspace, to match the heights and styles of the neighbouring residential dwellings whilst making efficient use of the development potential of the Site.

Given the siting and setback of the proposed dwellings, it is not considered that the development would have an overbearing or dominant presence on the street scene or neighbouring properties. Rather, the Proposal is considered to provide a significant improvement to the character and appearance of the street scene and immediate area by replacing the existing informal and unsightly car park with high quality residential dwellings that embody the prevailing design characteristics of the area to meet housing need.

Dwg. No. PL-06 – Proposed Street Elevations



Amenity Space

The Council's reasons for refusal were as follows:

2. The proposed development, due to the minimal size and inappropriate siting of the gardens, combined with the overshadowing from trees on the site, would not provide adequate and functional outdoor private amenity space for future occupiers. This would also not reflect the size or character of private residential gardens in the surrounding area. The proposal is therefore harmful to the amenity of future occupiers contrary to Policies CC7, H10 and H11 of the Reading Borough Local Plan 2019.

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

Local Policy H10 seeks to ensure all developments have adequate and functional private or communal open space, the size of which should respect the size and character of similar spaces in the vicinity.

The Local Plan identifies that, for houses, usable private outdoor space should be no less than the gross floor area of the dwelling to which it relates measured externally and included garage space).

The site layout has sought to ensure that the proposed dwellings are provided with ample private amenity space, whilst protecting the amenity of neighbouring occupiers. It is considered that the area and orientation are optimal and comparable to other gardens in the area.

The amount of private amenity space provided in the immediate area varies. Whilst a high proportion of properties are typified by long narrow rear gardens, many these have been subdivided over the years, comprising informal car parking and dominated by large rear outbuildings.

The Site is also within proximity to a variety of public large open spaces (including Hills Meadow and Christchurch Meadow) as well as other outdoor recreational facilities. Therefore, it is considered that the proposed amenity space is appropriate to the context and commensurate to the prevailing local character, and proposed housing typology.

Public Open Green Spaces within Walking Distant from Site



Neighbour Amenity

The Council's reasons for refusal were as follows:

3. The proposed development, due to its scale, siting, number and position of windows in relation to neighbouring dwellings and private gardens to the rear of the site along Coldicutt Street would result in overlooking and loss of privacy with consequent harm to the amenity of users of those gardens, The proposal is therefore contrary to Policies CC8 and H11 of the Reading Borough Local Plan 2019.

Please refer to the supporting Daylight and Sunlight Report prepared by Syntegra. A new assessment has not been commissioned as the amended design has been improved.

The proposed development has sought to protect the amenity of existing residents, whilst providing appropriate levels of amenity to the future occupiers of the new homes. Policy CC8 of the Local Plan requires development proposals to protect the living environment of existing residential properties in terms of privacy and overlooking, sunlight and daylight, noise, and other matters.

The policy highlights that the position of habitable rooms, windows and outdoor living spaces is particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate; however, this will be determined based on on-site circumstances and in some cases, a closer distance may be acceptable without a detrimental effect on privacy.

The proposals do not include any back-to-back facing windows and the habitable rooms are generally orientated to the rear of the dwellings, thereby reducing any potential overlooking to existing rear gardens.

The main bedrooms and lounge have been located overlooking the rear gardens. Balconies have been excluded from the design. Windows shall be fitted with acoustic ventilators to minimise noise transmission into the dwellings. The properties are also set back from the edge of the highway pavement which forms an important acoustic isolation strip

A 1.8m timber fence is proposed to provide additional privacy to current and future occupants.

In summary, the proposed development will safeguard the amenity of the neighbouring residential properties, while also providing a high level of amenity for the proposed residential dwellings. We therefore consider that the proposed development accords with Policy CC8 of the Local Plan.

Flood Risk

The Council's reasons for refusal were as follows:

4. It has not been demonstrated that there are no alternative sites at lower risk of flooding that should be developed in sequential preference to the application site. The proposal is therefore contrary to Policy EN18 of the Reading Borough Local Plan 2019.

Please refer to the supporting Flood Risk Assessment including Sequential and Exception Test prepared by Syntegra.

The National Planning Policy Framework (NPPF) states that within Flood Zone 3, 'highly vulnerable' uses should not be permitted in this zone. Paragraph 162 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with lower risk of flooding. The submitted Flood Risk Assessment has detailed measures to mitigate the risk of flooding and has demonstrated that there are no suitable locations for the proposed development in area of lower flood risk.

The Sequential Test aims to ensure that development does not take place in areas at high risk of flooding when appropriate areas of lower risk are reasonably available. The site is situated in Flood Zone 3 when using the Environment Agency Flood Map for Planning (Rivers and Sea).

A list of comparable alternative sites within the local area was explored to determine the availability of an alternative sites for residential use was available in an area with a lower risk of flooding. The test was carried out by Syntegra Consulting who found that there were no sequentially preferable alternative sites available for development.

Further to the conclusions of The Sequential Test, an Exception Test was undertaken in accordance with the NPPF to ensure that the proposed development would provide wider benefits that outweigh the flood risks of the Site, ensuring the long-term safety of the proposed users and without increasing the risk of flooding elsewhere.

The wider sustainability benefits of the scheme have been set out in the ensuing section of this report. The following measures have been incorporated to ensure the safety of the development and its users.

The Council's latest Housing Trajectory as published in the Annual Monitoring Review demonstrates that the Council has a greater than 5-year housing land supply and that the total supply of housing exceeds the figure for identified need and therefore sufficient land at a lower risk of flooding exists and the sequential test would be unlikely to be passed and permission unlikely to be granted. However, a closer examination of the figures the need for family housing (3 beds or more), which this proposal offers. The Site is located in Zone 2 and would therefore contribute to the vitality and viability of the town centre.

The Proposal would be raised 0.75m above natural ground floor level to ensure that the ground floor level would be set above the peak flood levels, to be agreed and confirmed with the Environmental Agency. An appropriate flood warning and evacuation plan would be development for the site and put in place for the residents, include provision of a place of refuge. No sleeping accommodation is proposed on ground floor level and no self-contained lower ground floor residential units will be created as part of the development.

In light of the above, it is considered that the Site meets the provisions of the NPPF, is an acceptable site for residential development that would include measures to ensure the long-term safety of the proposed users of the Site.

Full details of a sustainable drainage system for the Site, including confirmation that the proposed development would not increase the risk of flooding elsewhere, would be provided at planning application stage.

Biodiversity

The Council's reasons for refusal were as follows:

5. The proposed development has failed to demonstrate that the development would not result in a net loss of biodiversity or that a net gain for biodiversity would be achieved. The proposal is therefore contrary to Policies H11, EN12 and EN14 of the Reading Borough Local Plan 2019.

Reading Borough Local Plan (Adopted November 2019) does not have a 10% net gain requirement and it states no net loss in biodiversity. Therefore, only an ecologically sensitive landscape scheme and /or biodiversity enhancement scheme would be required for this development as it is classified as a small development and not part of mandatory BNG. We consider a this could be conditioned.

Nevertheless, the proposed development will include a significant amount of planting and the use of wildflower grasses to provide greening to the Site and create opportunities for new habitats and biodiversity. In this regard, the landscaping scheme provides careful consideration of opportunities to achieve a biodiversity net gain. Moreover, artificial habitats can also be included in the landscaping such as bat and bird boxes, loggeries etc.

Affordable Housing

The Council's reasons for refusal were as follows:

6. 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

Please refer to the supporting Viability Report by AGA.

iii. Other Material Considerations

Residential Mix & Density

The proposed development comprises a total of two residential dwellings with five bedrooms. Policy H2 of the Local Plan highlights that residential development should contribute towards meeting the Council's specified housing needs, and particularly for family homes of three or more bedrooms. In this regard, the proposals will provide two family sized homes to help meet a clear and demonstrable need.

The proposed residential mix is similar to what was proposed as part of the pre-application scheme. The pre-application response advised that the unit mix was acceptable and in line with Policy H2, again highlighting the need for family-sized dwellings, and in particular for three+-bedroom units.

With regard to density, Policy H2 suggests an indicative density range of 30-60 dwellings per hectare (dph) in suburban areas. The Site comprises an area of approximately 0.0413 hectares and the proposed density for two dwellings is, therefore, at the lower end of the density range that is considered suitable for the Site. Moreover, the density is informed by the need to safeguard the amenity of the neighbouring residential properties.

As such, the provision of two dwellings is in line with the indicative density for the Site.

Design & Materials

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

The design of the proposed dwellings and the palette of materials have taken cues from the surrounding context which is somewhat mixed in nature and characterised by a mixture of red and yellow brick and white rendered facades.

In terms of materials, the dwellings will be constructed of red brick with white painted weatherboarding and grey tile roofs. They will also feature brick detailing, corbelling and decorative pitched roof porches, which will enhance the articulation and ensure a richness to the architectural style.

The general approach to design and materials was considered acceptable in the pre-application response, which highlighted that the proposals provided a good level of architectural detail that would integrate appropriately with the mixed character of the surrounding area.

Having regard to the above matters, it is considered that the proposals accord with Policy CC7 of the Local Plan, which seeks to ensure that developments respond positively to the local context and have regard to matters including layout, landscape, architectural details and materials and other criteria.

Highways & Parking

Please refer to the supporting Transport Statement prepared by Kronen Limited.

Local Policy TR3 states that in determining proposals involving new or altered access to the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where:

- Access and works to the highway comply with the adopted Transport Authority standards.
- The development would not have a material detrimental impact on the transport network.
- The proposals would not be detrimental to the safety of uses of the transport network including pedestrians and cyclists.
- The proposals would not generate regular HGV movements on unsuitable roads.

Local Policy TR4 requires developments to improve access too and integration of cycling facilities, including through provision of new facilities. Local Policy TR5 requires new developments to provide car parking and cycle parking that is appropriate to the accessibility of sites location within the Borough, and to provide 10% of car parking spaces with electric vehicle charging points.

The Site is located within Zone 2 – Primary Core Area, an area defined as directly surrounding the core area and well served by public transport.

The Revised Parking Standards and Design SPD (2011) identifies the need for 2 parking spaces for 3+ bedroom dwellings located in Zone 2, which this proposal adheres to.

The Application demonstrates that there would be no detrimental impact on the local area arising from the development in regard to parking and highways.

Cycle Parking: The Parking SPD sets out a minimum requirement for cycle parking spaces for the development. Covered and secure communal cycle storage would be provided in the shared amenity space and would provide space for at least 6 cycles in accordance with the Parking SPD.

Refuse & Recycling Facilities: The submitted site plan shows refuse and recycle storage would be located in the shared amenity area to the west of the Site. Refuse and waste storage would be provided in accordance with local requirements.

Energy & Sustainability

Please refer to the supporting Energy Strategy Report prepared by Syntegra.

Policy H5 of the Local Plan requires all non-major new build housing to achieve at a minimum, a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. Policy CC3 of the Local Plan also requires developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.

The Design Team has carefully considered the aforementioned policies and the guidance contained in the Council's adopted Sustainable Design and Construction SPD (2019).

The proposed development seeks to optimise the use of available land by providing family-sized homes in an accessible location. The new dwelling houses will be up to current Building Regulations standards.

sustainable drainage system will be provided for the hardstanding parking areas, details of which can be confirmed by planning condition. The waste management strategy for general site set-up, wheel washing, parking, and working hours can also be adhered to as part of conditions.

The Proposal would comply with water efficiency standards and other sustainability targets as a minimum. Photovoltaic panels and air source heat pumps are proposed.

In summary, the proposed development accords with Policy H5 of the Local Plan and with the guidance set out in the Council's Sustainable Design and Construction SPD.

Ecology & Biodiversity

Please refer to the supporting Design and Access Statement prepared by CDP Architects.

Policy EN12 states that, for all sites, development should not result in a net loss of biodiversity and should provide for a net gain in biodiversity wherever possible. Development should also protect and wherever enhance features of biodiversity interest on and adjacent to sites and provide new tree planting, wildlife friendly landscaping and ecological enhancement.

The Design Team has also carefully considered the proposed layout of the Site, with a view to retaining and supplementing the existing soft landscaping to optimise the biodiversity within the Site including enhancements, as set out above.

Trees & Landscaping

Please refer to the supporting Tree Constraints Plan and Tree Schedule prepared by Crown Consultants, which concludes that no tree removals are required to facilitate the proposed development. The proposals will not have adverse impacts on the long-term vitality of adjoining trees.

The planning application is also supported by a Landscaping Scheme, which includes details of supplementary landscape and wildflower planting, which will strengthen the landscape structure of the Site and provide for an enhancement in biodiversity.

In summary, the proposed development will strengthen the landscape structure of the Site and accords with Policies EN12 and EN14 of the Local Plan.

Community Infrastructure Levy

The CIL charging schedule was adopted in 2015, to be applied to all new residential floor space. The adopted charging rate is £120 per sqm, indexed to £156.71 per sqm as of 31 March 2021.

6. SUMMARY & CONCLUSIONS

The Proposal seeks to maximise the potential of an underutilised site through the construction of two high quality 3-bed, 5-person residential semi-detached dwellings with associated landscaping, parking, cycle storage, and refuse recycling storage. The proposed dwellings have been designed to reflect the local typology and vernacular, resulting in a development that improves the character and appearance of the existing Site, currently used as car park, and of the wide area.

We would respectfully submit that the proposed development represents sustainable development based on the following reasons and considerations:

- The principle of residential development accords with the Local Plan and the proposed density is in line with the Council's aspirations for the Site.
- The proposed development will provide two new family-sized homes and represent a net increase of homes, which will help to address the need for housing in the Borough.

- The proposed dwelling mix is in line with Policy H2 of the Local Plan and was considered acceptable in the Council's pre-application response.
- The proposed design and materials have been informed by the surrounding context to ensure that the new dwellings will sit appropriately within the area, complementing and enhancing the existing character and townscape features.
- The dwellings are sited in a manner which safeguards existing residential amenity, with the terraces set back sufficiently from existing properties to maintain levels of privacy.
- All flank windows in the newly designed houses will be obscure glazed to ensure that there is no potential for overlooking to rear gardens or neighbouring windows.
- The proposed access/egress and internal road layout allows for sufficient manoeuvring and parking.
- The proposed development complies with the standards set out in the BRE Guidance, thereby meaning that the internal daylight levels within existing neighbouring residential properties will be safeguarded, as well as ensuring acceptable daylight levels within the proposed new dwellings.
- The proposed development has been carefully designed with a view to optimising the energy efficiency and sustainability credentials of the new dwellings.
- The proposed development will not require the removal of any trees and the proposals will not have adverse impacts on the long-term vitality of the retained trees.
- The proposed development is supported by a Landscaping Scheme which includes details of supplementary landscape and wildflower planting, which will strengthen the landscape structure of the Site and provide for an enhancement in biodiversity. (Net gain achieved.)
- The dwelling would be sited well above the anticipate flood breach levels and not bedrooms would be located on ground floor level to mitigate flood risk for future occupants.

In conclusion, we consider that the proposed development accords with the relevant adopted planning policies and associated guidance at the local and national level. We would also respectfully submit that the proposed development accords with the principles of proper planning and sustainable development, and that planning permission should be granted.

I trust this letter is satisfactory for the registration and validation of this Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



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