

Responses for Additional Information, 2024-12-18

(in response to Jonathan’s email of the 6th December, 5:14pm)

Table of Content

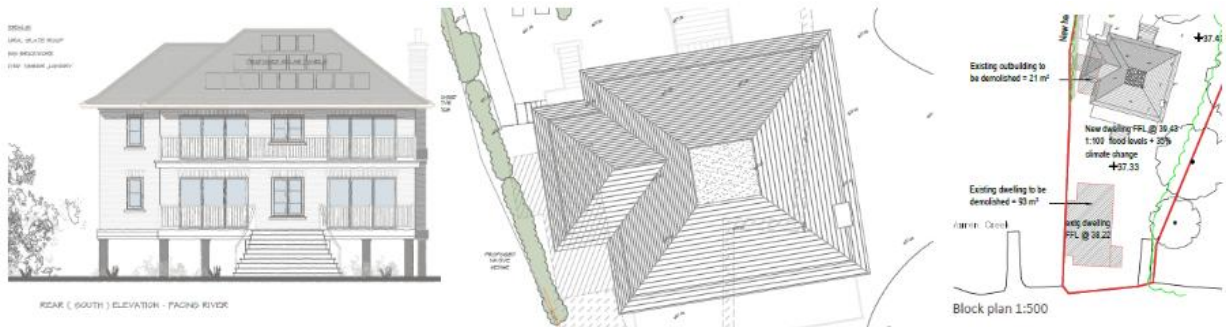
Table of Content	1
Jonathans response	2
Appendix A – Room Sizes	6
Appendix B – Alignment to policy H5	7
Appendix C – Design Changes	8
Appendix D - Policy H11 – Development of private residential gardens.....	9
Appendix E - Policy Assessment.....	12
Appendix F – Heritage Views	14
Appendix G – The title of the submission.....	15

Jonathans response

Dear STL Architecture,

Thank you for your recent application submission to the local planning authority (portal ref PP-13610677). I am the assigned case officer for your application. I have considered the submission for the purposes of validating the application and found it to be invalid. The following information is required prior to the application being valid and thereafter registered (as per the [validation requirements](#)):

1. **UPDATED** - Please submit proposed east-west and north-south section plans through the proposed dwelling and separate section plans through the proposed garage too, with these including land levels, floor levels and eaves/ridge level annotations too. Please also submit corresponding existing section plans through the exact same areas of the site as proposed, to demonstrate the existing land levels at the same points as where the proposed section plans are provided from. This is to demonstrate both existing/proposed land levels, but will also show the floor to ceiling heights within the various floors of the proposed building and (if applicable) the garage too. It will also demonstrate the projection from the roofslope of the proposed solar panels on the southern roofslope. This is required as per validation requirement 19, bullet point 7.
2. **CREATED** - Please provide floor plans (on a floor-by-floor basis) to evidence the stated existing and proposed CIL floorspace figures (with the floor plans showing the precise methodology as to which areas have / haven't been included – usually shown via colour coded annotations). This is required as per validation requirement 19 bullet point 6.
3. **UPDATED** - Please provide an indication as to how the proposed dwelling and garage would appear in comparison with the existing structures at the site and in comparison with the existing neighbouring properties. This is as per validation requirement 19, bullet point 8. Whilst this is acknowledged to reference 'street scenes', in this instance it is more 'river scenes' which are required to be provided. The plans and elevations submitted only specify the application site dwelling and garage in isolation, not showing the proposed structures in any context, without reference to any neighbouring property. Therefore, the level/nature of information submitted to date falls below that required as per the validation requirements, or to actually assess your proposals in full. As such, the further information noted above is required.
4. **UPDATED** - There is inconsistency between the proposed roof plan and proposed south elevation plan submitted. The south elevation plan indicates a series of solar panels are proposed on this roof slope, but these are not indicated on the roof plan or the block plan. Please update the relevant plan(s) accordingly, so that there is consistency between all plans submitted.



5. **UPDATED** - The proposed roof plan and site plan (above) do not appear to indicate the extent of the proposed roof terrace at first floor level, as shown on the first floor plan. Please update the roof plan and site plan accordingly, so that it is consistent with the first floor plan.



6. **See Appendix A** - As per validation requirement 19, bullet point 9, please provide schedules of room sizes to show how they meet the [Nationally Described Space Standards](#)
7. **UPDATED** The proposed garage plan does not specify north/east/south/west elevations, just front/rear/side. When comparing this with the block plan, it is not possible to ascertain with 100% accuracy which elevation is which, so I seek for the annotations to be amended on the garage plan to specify the north/east/south/west elevations please.
8. **UPDATED** Based on a site visit for separate application PL/24/1461, it would appear that the existing north and east elevation plan and floor plan is inaccurate, with one fewer window on each of these elevations (within the bedroom in the north-east corner of the building – see a marked up photo below). Please update this plan accordingly.



An addendum for the 3 images in the “Preliminary Ecological Appraisal and Preliminary Roost Assessment Issue 2” that have been superseded is attached . Appendix 1 in the Preliminary Ecological Appraisal and Preliminary Roost Assessment Issue 2 by Arbtech Consulting Ltd includes plans which are inconsistent with those submitted elsewhere within the application. Please amend the report accordingly, as it appears to be inaccurate in comparison with other documents submitted.

Whilst the following are not matters which prevent the future validation of the application, I would welcome your initial clarifications please (ideally at the same time as the matters referenced above):

- a. [See appendix B](#) At pre-application stage it was advised that a Policy H5 statement be submitted to detail how you consider your proposals comply with the specific elements of this policy. No standalone statement appears to have been submitted. I request this being submitted within 2 weeks of the future validation of the application (if not submitted at the same time as matters which have resulted in the application being invalid as specified at the outset of this email).
- b. The planning statement letter by Woolf Bond Planning includes a section entitled ‘Planning History / Context’, which includes the following commentary *“The proposed scheme is very similar in design respects to that previously refused and therefore does not introduce any need for reconsideration of the above matters. The positive assessment in all of these respects can be made”*. However, based on my first glance of the proposals it would appear to me that the proposed design of the new dwelling has changed and the location/footprint of the proposed garage has moved to a different location within the plot too. [See appendix C](#) Accordingly, I would have expected, and moreover consider it necessary, for you to provide your supporting commentary / information in the following regards, to seek to justify the appropriateness of the currently proposed scheme:
 - [See appendix D](#) Consideration of the proposals against the criteria of Policy H11 - Development of Private Residential Gardens) (e.g. comparable with pages 9-11 of the Planning, Design & Access Statement by STL Architecture and Planning, as received on 17/05/2024 at the time of application PL/23/1270)
 - [See appendix E](#) Consideration of the proposals in terms of the impact on the Thames and Major Landscape Feature (as per policies EN11, EN12, EN13, H11 and CC7) – in this regard, a combination of commentary (e.g. comparable with pages 9-14 of the Planning, Design & Access Statement by

STL Architecture and Planning, as received on 17/05/2024 at the time of application PL/23/1270) and updated visuals (for example, comparable with the 9 pages of Existing and Proposed River Viewpoints received on 17/05/2024 at the time of application PL/23/1270) would be encouraged to be submitted for consideration.

- [See appendix F](#) Consideration of the proposals in terms of impacts on heritage assets (Policy EN1) and significant views (Policy EN5) – in this regard a combination of commentary and visuals would be encouraged to be submitted for consideration (e.g. comparable with pages 12-13 of the Planning, Design & Access Statement by STL Architecture and Planning, as received on 17/05/2024 at the time of application PL/23/1270).

I request any information you wish to be considered in respect of these matters to be submitted within 2 weeks of the future validation of the application, to aid the timely assessment of the application.

Description of development

[See appendix G](#) - I note that you have specified a description of development as follows:

Demolition of existing dwelling & outbuildings and replacement with a Self build 4-bed detached dwelling with garage.

I consider that the description could benefit from some minor refinements, given the reference to 'self build' is not particularly relevant to the assessment of the application. I suggest the following alternative wording:

Demolition of existing dwelling and outbuildings and the erection of a 4-bed detached dwelling with garage.

I would welcome your agreement or comment to this description of development please?

Next steps

The information requested to enable the validation of the application is required to be submitted within 28 days of this email (with view to validating and registering the application thereafter), or your application could be treated as invalid and closed, with a percentage of the paid application fee retained to cover the costs of the work already carried out (see page 3 of the validation requirements document). As such, I will await to hear from you by Friday 10th January 2025 (an extra week has been added on this occasion to account for the upcoming festive break). Please submit additional information via email [direct to me](#) with documents in a pdf format (or via a weblink if the documents are of a significant size – please ensure all individual documents remain under 20mb in size). If these timescales are problematic for you, please feel free to contact me to discuss this further.

I hope that the above is clear and is of assistance to you. Should you have any questions or queries, please feel free to contact me to discuss this further. I look forward to hearing back from you.

Appendix A – Room Sizes

The Technical housing standards – nationally described space standard - 27 March 2015 have been referenced to validate that the house meets the Gross Internal Floor Area requirements of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

Schedule of rooms in the proposed development...

Room	Location	Gross internal floor area (m2)	Built-in storage	Ceiling height (m)
Bedroom 1	South West Corner	22.99	2.7	2.58
Bath for bedroom 1	n/a	6.59		2.58
Bedroom 2	South East Corner	17.72	2.5	2.58
Bath for bedroom 2	n/a	6.18		2.58
Bedroom 3	North West Corner	16.26	1.2	2.58
Bath for bedroom 3	n/a	4.52		2.58
Bedroom 4	North East Corner	13.51	1.2	2.58
Bath for bedroom 4	n/a	4.70		2.58
Landing	n/a	15.1	1.5	2.58
Kitchen dining	n/a	37.3		2.58
Living room	n/a	23.98		2.58
Study	n/a	15.15	3.4	2.58
Cloakroom	n/a	3.10		2.58
Hallway	n/a	18.93	2.6	2.58
Utility room	n/a	11.50		2.58
TOTALS		217.53	15.10	

Following Technical housing standards nationally described space standard table 1, the proposal with 2 double bedrooms and 2 single bedrooms is classified as a 4b / 6p.

For a 2 storey dwelling, the gross internal floor area should therefore be a minimum of 106 sq m, including a minimum of 3sq m of built in storage.

It should be noted that all bedrooms are in excess of 2.75m wide, no ceiling heights are below 1.5m, there is no eaves storage, the under stairs space has not been contributed towards storage and balconies are not included within sizes.

From the schedule above, it can be ascertained that the proposal exceeds the minimum gross internal floor area of 106 Sq m by 205% and exceeds the minimum built in storage of 3 sq m by 503%.

Appendix B – Alignment to policy H5

H5: STANDARDS FOR NEW HOUSING

- a. From a space perspective, as demonstrated in the **room size analysis** the proposal is far in excess of the Technical housing standards – nationally described space standard minimum of 106sq m for a 4 b / 6p (4 bed house for 6 people) home and therefore complies with **H5a**
- b. The proposed new dwelling will be constructed with floodable voids beneath, while the finished floor level will be situated at 39.17m AOD. This is above the 1% AEP flood level plus the allowance for climate change and therefore complies with **H5b**
- c. As a single dwelling, the proposal isn't subject to **H5c**, but the build aims to achieve a zero carbon status
- d. Against the requirement of a minimum 19% improvement between the Dwelling Emission Rate (DER) and the Target Emission Rate (TER), the Energy Statement submitted with this application shows a 93.68% improvement. The proposal therefore complies with policies CC2 and **H5d**.
- e. Considering accessibility and adaptability in section **H5e**. To comply with flood regulations there is a need to have the house raised and accessed by steps. In line with the planning preferences from the previous planning application, a raised metal grid walkway has been included to the westerly perimeter of the plot. This will include a minimal handrail on one side to minimize it's visibility but provide safety guidance when in use. This walkway terminates on the drive slope up to the road. If a walkway isn't acceptable, there remains the detailed "Flood Action Plan" embedded in the FRA that includes occupants being signed up to receive the Environment Agency's flood warnings on their phones and much more.
- f. This proposal is a single dwelling and not subject to **H5f** which addresses developments of over 20 dwellings.

Appendix C – Design Changes

This application is predominantly the same from an overall size, location, mass, method and material perspective. In the interest of transparency, the grid below calls out where there is change

House Position	The house has been rotated 10 degrees anti clockwise, positioned 1.2m further south and 0.5m further east
House Size	The owners have chosen to decrease the over footprint of the house from 153sq m to 135sq m
Garage roof	The owners were concerned the garage wasn't in the style of the house. The change to a hip roof follows the style of the house roof and further reinforces the roof space as not suitable for any sort of office or accommodation
Garage position	With the addition of an emergency evacuation route it was felt more appropriate to switch the garage from the western edge of the garden to the eastern edge. This location is flanked by a 1.5m access walkway from the road to the next door plot which is a wood. There is then a 2m high wooden fence separating the path from the following neighbour, Creek House. The minimum distance from the nearest corner of the garage to the nearest corner of Creek House is 10.57m
Garage height	The owners are modelling the house roof on a Georgian design which typically incorporates cornice contouring as part of the soffits. The additional height will allow the garage to have similar treatment and scale thereby providing design harmony with the house.
Garage size	This submission sees the depth of the garage remaining unchanged and the width of the garaging unit reduced by 1.2m
Emergency evacuation	In response to the previous feedback which expressed a preference to have assured egress, a raised open metal grid path has been added.
Parking size	To ensure the proposal creates compliant BNG analysis, the parking has been reduced from 275sq m to 217sq m.

Appendix D - Policy H11 – Development of private residential gardens

With regard to policy H11 (Development of private residential gardens) the following observations can be made to demonstrate that the policy has been carefully considered and the proposal delivers benefit...

This proposal seeks to replace the existing outdated dwelling with a new family friendly, energy efficient dwelling. The replacement of an existing dwelling with a new dwelling is a suitable form of development within the built limits of the Borough. Local Plan policy H11 sets out that proposals for new residential development that includes land within the curtilage of private residential garden will be acceptable where proposal comply with the a list of 9 criteria. This proposal's compliance with each policy criteria is set out below. This is very similar to the previous application (PL/23/1270) but recognizes the proposed reduction in house and outbuilding sizes

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;*** The existing house is located in very close proximity to the river. It's location differs considerably from the existing build form along The Warren where houses are family sized and predominantly set back from the river. The proposal seeks to relocate the dwelling further away from the river in order to reflect the prevailing character of the area. Although the proposed dwelling is now closer to neighbouring dwellings, mature trees and a distance of more than 40m will maintain the existing space around buildings in the 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;*** As discussed above, the revised dwelling location seeks to improve the relationship between the building on this site and the existing building line. In terms of built up coverage of the plot, the existing built form proposed to be demolished has a combined built footprint of 168.6m². The proposed dwelling and garage have a combined built footprint of 190m². Excluding the approved Permitted Development, that is a 12.5% increase on the current buildings. As such, there will only be a minor increase of built up coverage of the plot. The existing pattern of an open frontage onto the river with vegetated side boundaries will remain unchanged.
- ***Providing appropriate hard and soft landscaping, particularly at site boundaries. This includes features such as the variety of trees, hard standing/lawns and hedges, etc;*** The existing hard standing forming the concrete parking area is to be removed and replaced with a permeable surface. The removed concrete, as described in the previous proposal will be used beyond the flood zone and root zones to improve the structural integrity of the drive. The proposed permeable surface area for parking has been reduced from 275sq m to 217sq m. A new native hedgerow is proposed to the western boundary. No trees are proposed for removal and the scheme has been carefully designed to sit sensitively around the existing trees on site.

- ***Compatibility with the general building height within the surrounding area;*** The majority of the dwellings along The Warren are set on higher land closer to the road and there is a varied building height between different properties. Despite being raised to mitigate flooding issues, the eave height of the proposed dwelling is 44.56m AOD, compared to 44.45m AOD of the neighboring dwelling to the east. This demonstrates that the proposed dwelling will be compatible with the general building height within the surrounding area.
- ***The materials and elevation detail. These should be high quality, and where appropriate distinctive and/ or complementary;*** The elevation detail has been designed to be a high quality and modern whilst retaining some traditional feel. The below comments and image are designed to provide some clarity around the quality of build, the attention to detail and the choice of materials.
 - Build method – A timber framed building with a brick outer skin tied back to the timber
 - Brick - The intention is to use a brick that has probably been tumbled or hand made to give a look with softer edges.
 - Roof – A natural slate roof with leaded hips.
 - Windows – Slimline aluminum flush casement windows and doors.
 - See below a recently approved and built Georgian style dwelling within the Caversham Heights area for reference.



- We request that material selection is conditioned at this stage
- ***The arrangement of doors, windows and other principal architectural features and their rhythm between buildings.*** Beyond houses being family sized and set back from the river, there is little rhythm to follow. There is no additional relationship of windows, doors or architectural features between the neighbouring buildings. The proposed building has a

hipped roof, a chimney and sits on stilts in order to ensure safety to life and provide the proposal with traditional architectural features. The primary windows have been placed on the south elevation to benefit from the maximum advantage of solar gain and to maximise natural light to the primary living. The garage roof has now be restyled to be a hip roof, following the style of the main house

- ***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;*** The dwelling has been designed to sit comfortably within its setting given the size of the existing plot. The central part of the site is the widest part of the plot and the new dwelling is shown in this area. Ample space is provided around the building and the plot benefits from a large amount of amenity space running down to the river.
- ***The proposal includes access, which meets appropriate highway standards;*** The existing access serving the site is not proposed to change.
- ***The proposal does not lead to tandem development;*** The proposal is for a replacement dwelling and therefore does not lead to tandem development
- ***The design and layout minimises exposure of existing private boundaries to public areas, and avoids the need for additional physical security measures;*** As discussed above, the setting back of the proposed house will minimize the exposure of the dwelling house to the public area along the river. There is no requirement for additional security measures.
- ***The proposal does not cause a significant detrimental impact to the amenity of adjacent and nearby occupants;*** The site is screened from neighbouring dwellings by mature vegetation. Large mature trees screen the houses on both sides. The proposed house is 42.5m away from its nearest neighbour. The single storey garage is 10.57m away from the nearest part of Creek House. Neither will cause detrimental impact to the amenity of adjacent or nearby occupants.
- ***The emphasis is on the provision of family-sized housing.*** The proposal is seeking to demolish a 2-bed property and replace it with a 4-bedroom family home. It therefore accords with the Council's emphasis on the need for more family-sized housing.
- ***The development provides biodiversity net gain wherever possible and does not result in Biodiversity Net Loss in any of the 3 categories. It 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 sits on the edge of an area of identified biodiversity interest but not within it. Accordingly, the designs allow for the provision of compliant biodiversity net gain through the use of trees, hedges, bat boxes, hedgehog domes and other habitat creation. The significant removal of concrete hard standing will also contribute to green space within the site. In conclusion, this proposal needs to achieve a minimum of no net loss of habitat, as this is a self build project. However in this instance it can be seen as there are benefits in all three areas. Total net % change :
Habitat units 3.75%✓ / Hedgerow units 188.77% ✓ / Watercourse units 7.52% ✓

- ***The proposal does not prejudice the satisfactory development of a wider area*** There is no wider area to develop so this policy is not relevant to this proposal.

Appendix E - Policy Assessment

Character and Appearance of the Area

The site is situated in the Thames Valley Major Landscape Feature area. Policy EN13 states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The character of the area in this part of The Warren is of large detached properties, clearly visible from the river footpath, with gardens between them and the river edge.

The existing property at Warren Creek is an exception to the prevailing character, with the building fronting right up to the edge of the river. The proposed development therefore seeks to set the property further back in the plot, away from the river's edge, in order to reflect the prevailing character of the area. Accordingly, the new development layout has been designed to sensitively sit within its setting, while also benefitting from a sympathetic architectural style in its design, scale and massing. The proposal therefore maintains and enhances the character and appearance of the area and complies with Policy CC7.

The existing dwelling has a large frontage of windows in very close proximity to the river's edge. There is a considerable amount of light spillage directly onto the waterscape. The setting back of the dwelling within the site will reduce the light pollution in such close proximity to the river.

Waterscapes

Local Plan policy EN11 seeks to protect and enhance Reading's waterscapes to ensure that is no adverse impact on the functions and setting of any watercourse. The policy states that where development in the vicinity of watercourses is acceptable, it will comply with a number of criteria. The criteria are set out below and the proposals compliance with different points is discussed.

- ***Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;*** The existing dwelling sits right on the river frontage and dominates views into the site from the river and footpath to the south. The proposed development seeks to soften the relationship between the river and the built form by relocating the dwelling circa 30m to the north, within the central part of the site. This will significantly enhance the relationship by giving the river and river bank prominence in views along the river, which will now benefit from a reduced amount of built form on the river's edge.
- ***Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses;*** As discussed above, by setting the proposed

dwelling back 30m from the river frontage, the proposal makes a significant contribution to the distinct character and appearance of the watercourse.

- ***Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;*** The watercourse now has a strengthened role as an important landscape feature. This is thanks to the replacement of the existing concrete patio between the river and house with a strip of paving followed by 25m of green space. By separating the dwelling from the waterfront this proposal will also improve the ability for wildlife to traverse the area beside the watercourse during both regular periods as well as times of flooding.

- ***Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it;*** There are no proposals to change the river bank, maintaining all current levels of access. Once the old dwelling is demolished, a new river frontage that is predominantly grass will be wildlife accommodating whilst providing access to the river for the occupants of the new dwelling to partake in recreational opportunities.

- ***Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;*** The proposed dwelling replaces a home that is 4m from the water with a replacement that is set back circa 30m back from the watercourse.

- ***Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses;*** As discussed, the proposal seeks to balance the provision of new habitats on the river frontage with access to the river for recreational opportunities

Appendix F – Heritage Views

The application site is 1.5km from Caversham Court Gardens and will therefore have no impact on the setting of this heritage asset. The application therefore complies with Policy EN1 - Protection and Enhancement of the Historic Environment.

Pre-application advice from the Council's officers stated that the application site is within two viewing corridors highlighted within Policy EN5 - Protection of Significant Views with Heritage Interest. The following pictures demonstrate those views and show that the application site is either not visible or is completely screened by mature vegetation. The proposed development will therefore not harm the historical significance of these views.

View from MacIlroy Park - Application site is screened by mature vegetation



View from Caversham Bridge - Application site cannot be seen as the river meanders upstream



Appendix G – The title of the submission.

- Being a Self Build would seem to affect the BNG acceptable result levels and the CIL calculation. As long as the application is acknowledged to be a self-build, it is acceptable for the title to be modified as suggested.