

# PLANNING, DESIGN AND ACCESS STATEMENT

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INCL. TRANSPORT STATEMENT AND SUSTAINABILITY STATEMENT

2 TILEHURST ROAD, READING, RG1 7TN

FEB 2025

## PROPOSAL

Planning permission is being sought for:

- Change of use from a hotel (Use Class C1) into 7 x 1-bedroom flats (Use Class C3), together with associated internal works to the listed building and external site works including 3 x car parking spaces, 8 x cycle parking spaces, soft landscaping and provision of communal external amenity space.
- Improvements to fenestration and repair works to garden walls, including reinstatement of former side opening.

Pre-application feedback has been received from Reading Council for this proposal under reference 240617. The proposal has been amended in accordance with the feedback received and additional reports in support of the proposal have been provided as part of this submission.

The reports include a Noise Impact Assessment, a Heritage Statement, Window Repair/Reinstatement Schedule, a Tree Survey including an Arboricultural Impact Assessment, an Air Quality Assessment, a BREEAM Pre-Assessment, and a Financial Viability Assessment.

A brief Transport Statement and Sustainability Statement are included as part of this Planning, Design and Access Statement.

## SITE CONTEXT

The application property is the former Belle Vue House Hotel. The property is a detached 4-storey Grade II listed building located at the junction where Tilehurst Road meets Belle Vue Road. Vehicular and pedestrian access is solely possible from Tilehurst Road.

The surrounding area consists of a combination of residential, commercial and retail properties, with dwelling houses to the north and west of the site and a vets centre directly opposite the site.

The site is within the Castle Hill/Russell Street/Oxford Road Conservation Area and is also within an Air Quality Management Area.

Currently, the property is vacant and has been for a number of years. This is verified by previous application PL/20/0219, wherein the planning officer at that time notes in their officer report that the property is vacant.



## SITE CONTEXT (CONT.)



## RELEVANT PLANNING POLICIES

- **National Planning Policy Framework (2024)**

The NPPF is a material consideration in planning decisions as it sets out the Government's planning policies for England and how these are expected to be applied. The NPPF emphasises that the presumption in favour of sustainable development should be at the heart of plan-making and decision-taking. Development proposals that accord with the plan should be approved.

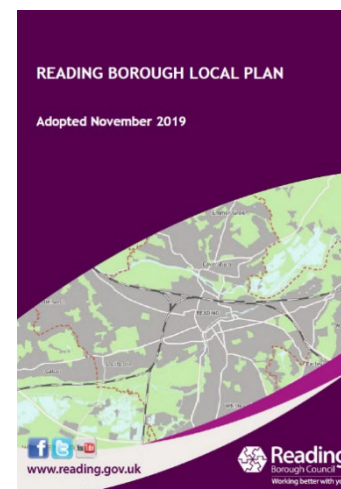
**Paragraph 39** states local planning authorities should approach decisions on proposed development in a positive and creative way, working proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area, and, where possible, seeking to approve applications for sustainable development.

**Chapter 16 of the NPPF 'Conserving and enhancing the historic environment'** sets out the Government's high-level policies concerning heritage and sustainable development.

**Paragraph 207** states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting, and **paragraph 208** states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

**Paragraph 212** of the NPPF states that great weight should be given to the weight of a designated heritage asset's conservation and **paragraph 213** states that any harm to, or loss of the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification'.

**Paragraph 215** states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.



- **Reading Borough Local Plan (2019)**

Relevant planning policies within the Reading Borough Local Plan are listed below with only the most applicable parts of each policy being referred to:

- **Policy CC2, 'Sustainable Design and Construction'**, states that proposals featuring the redevelopment and refurbishment of existing building stock will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. All minor conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum.
- **Policy CC3, 'Adaption to Climate Change'**, states that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. Proposals involving existing buildings should include measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc. Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas. All development shall minimise the impact of surface water runoff from the development in the design of the drainage system.
- **Policy CC5, 'Waste Minimisation and Storage'**, states that layouts and designs should provide adequate, well-designed space to facilitate waste storage and recycling.
- **Policy CC8, 'Safeguarding Amenity'**, states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. This includes impacts in terms of privacy and overlooking, access to sunlight and daylight, outlook, noise and disturbance.
- **Policy EN1, 'Protection and enhancement of the historic environment'**, states that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This includes Listed Buildings and Conservation Areas. Proposals should seek to avoid harm in the first instance.

Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

- **Policy EN3, 'Enhancement of conservation areas'**, states that the special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas.

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development

- **Policy EN6, 'New development in a historic context'**, states that new development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. The determination of planning applications for new development will take into account factors such as the positive contribution of the development to the existing historic townscape and the development's sensitivity to historic context.
- **Policy EN12, 'Biodiversity and the Green Network'**, states that, 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. This includes providing new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.
- **Policy EN14, 'Trees, Hedges and Woodlands'**, states that new development shall make provision for tree retention and planting within the application site, particularly on the street frontage 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.
- **Policy EN15, 'Air Quality'**, requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality.

Where a development would intensify uses such as residential within an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application.

- **Policy EM3, 'Loss of Employment Land'**, states that, when assessing proposals which would result in a loss of employment land outside of Core Employment Areas, this would take into consideration the following criteria:
  - (i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?
  - (ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
  - (iii) Is there a surplus of a similar size and type of accommodation in Reading?
  - (iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
  - (v) Is the need for alternative uses stronger than the need for the retention of employment land?
- **Policy H1, 'Provision of Housing'**, states that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.
- **Policy H2, 'Density and Mix'**, states that the appropriate density of residential development will be informed by, among other things, its current and future level of accessibility by walking, cycling and public transport and the need to maximise the efficiency of land use. Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms.

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

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

- **Policy H3, 'Affordable Housing'**, states that residential development will make appropriate contribution towards affordable housing to meet the needs of Reading.

On sites of 5 – 9 dwellings, a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough.

- **Policy H10, ‘Private and Communal Outdoor Space’**, states 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.

- **TR5: Car and Cycle Parking and Electric Vehicle Charging**, states that development 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.

# DESIGN

## External Design

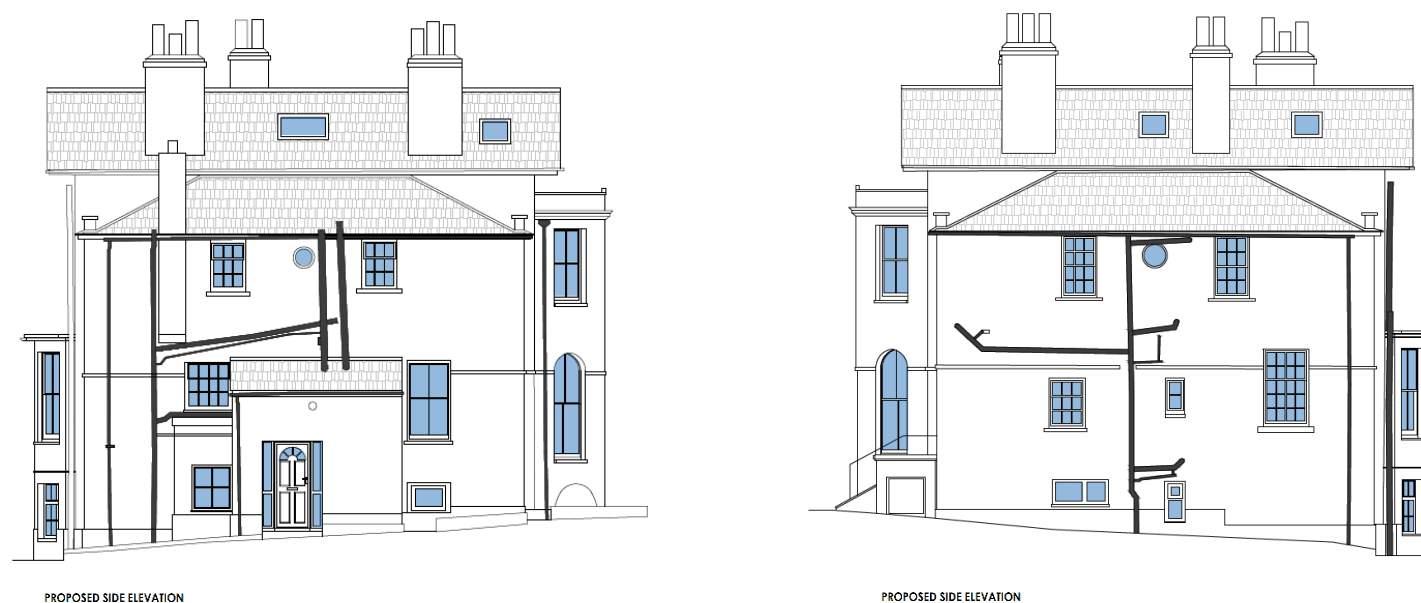
Significant external works are not proposed to the application property as part of this proposal.

As there is some scope to enhance the external appearance of the Grade II Listed Building, it is proposed that the existing fenestration be improved. Windows with historic context or those that are early replacements will be repaired and retrofitted with slimline double glazing or fitted with an internal secondary glazing system.

Modern and incongruous windows are to be replaced with new timber sash windows with slimline double glazing to match the style of existing historic windows. Currently infilled window openings will be reinstated. Replacement of the doors on the front and western side elevation is also proposed.

General repair work will be undertaken, including repair and treatment of damp issues within the lower ground floor. Repair works to garden walls are also proposed, including reinstatement of former side opening.

The modest extent of the proposed external changes will ensure that the significance of the heritage asset (which is derived primarily from its external character) is not harmed, but instead preserved and enhanced. Due to this, the proposal is in accordance with the NPPF and Local Plan policies EN1, EN3, and EN6.

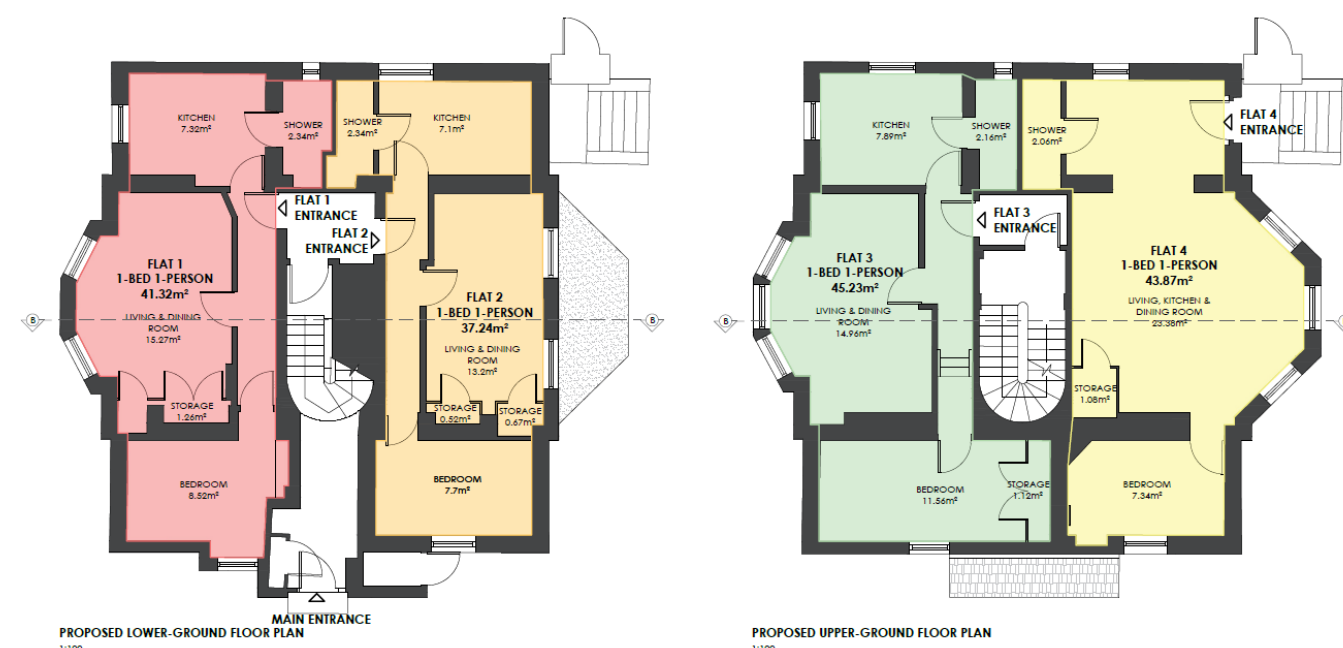


## Internal Design

Internally, the proposal offers seven dual aspect 1-bedroom 1-person flats. Only minimal and necessary alterations have been proposed in order to modify the layout to efficiently provide the flats. Therefore, where possible, some bedrooms, bathrooms, and WCs in the existing layout have been retained in their current position.

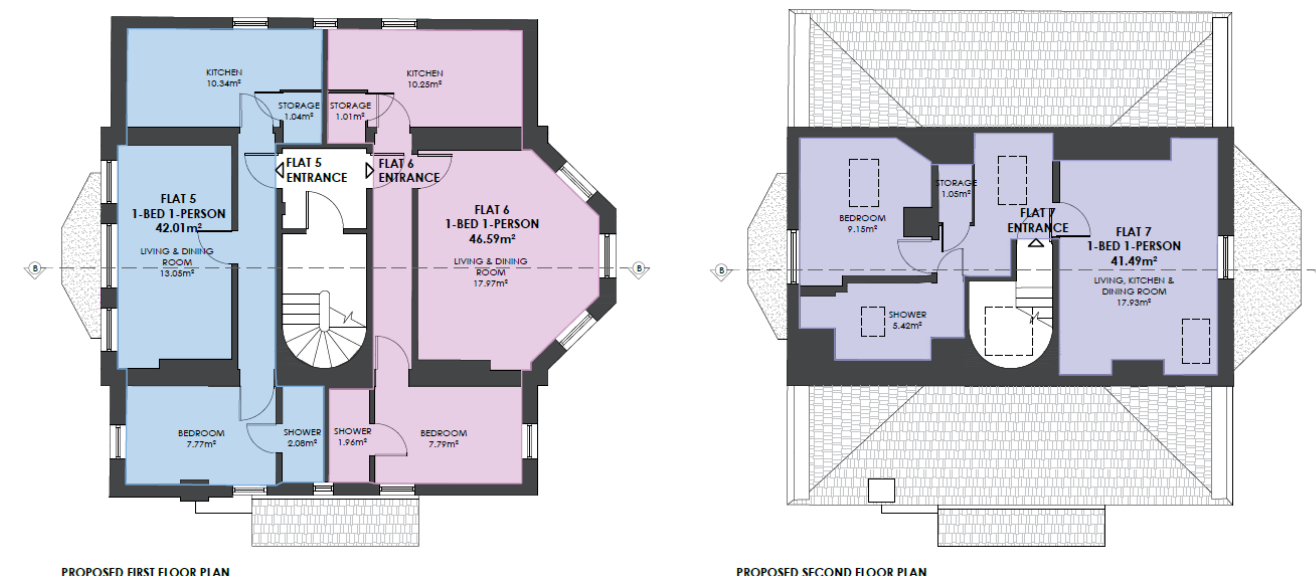
The proposed internal alterations will not affect the original walls of the property or impact any load-bearing walls. Only light stud walls that had been put in subsequently (and are therefore not original to the building) will be removed. This ensures that the fabric of the building that provides and holds value for this heritage asset will remain entirely preserved.

The ample space, capacity, and features which enabled the application property to function previously as a hotel will be more than sufficient in accommodating the proposed flats. The proposal is therefore practical and viable for this particular building, given its spaciousness.



The main entrance of the property will be the door on the western side elevation. The entrance opens to a communal lobby area from which Flats 1 and 2 can be accessed with the central staircase leading up to the flats above.

Whilst Flats 1, 2, and 3 can all be accessed from within the property, Flat 4 has an external access located on the western side elevation. Due to constraints being posed by the listed nature of the site, it is unfortunately not possible to make this external access step-free and fully accessible.



Flats 5 and 6 are hosted by the first floor and Flat 7 is hosted by the second floor.

In terms of gross internal area (GIA), all proposed flats meet the minimum national space standards requirement of 37 sqm for 1-storey 1-bedroom 1-person flats with a shower room. Six out of seven flats comfortably exceed this minimum requirement with the largest flat (Flat 6) having a GIA of 46.59 sqm. Where possible, stacking has been utilised to reduce noise and disturbance between the units.

All flats have a simple but efficient layout (including storage spaces) and every habitable room is served by well-positioned windows so that they benefit from an ample amount of natural daylight, sunlight, ventilation, and good outlook.

Whilst it is acknowledged that Flat 2 on the lower ground floor has its level of outlook and access to day/sunlight affected to some extent by the limited size of the windows on the southern elevation, this again would be difficult to rectify due to the listed nature of the application property, which restricts the extent to which external changes can be made to the property.

Nevertheless, Flat 2 is still served by windows on the eastern and western elevations, which helps prevent unacceptably reduced levels of outlook and access to day/sunlight for this flat. It is therefore considered that the levels of outlook and access to day/sunlight for Flat 2 are still sufficient enough to avoid any particular harm to the living conditions of Flat 2's future occupier. Moreover, the provision of new residential accommodation that accords with national space standards still outweighs this marginal shortfall in outlook and daylight/sunlight access.

The vast majority of the proposed flats meet and exceed the minimum national space standards requirement of 7.5 sqm for single bedrooms; the single bedroom belonging to Flat 4 will still provide a sufficiently-sized bedroom despite a very minor shortfall.

It is considered that the proposal provides good quality of accommodation for future occupiers.

# PLANNING ASSESSMENT

- **Viability of Existing and Proposed Uses**

The existing lawful use of the application property is as a Class C1 hotel; the proposed conversion into flats will therefore result in a loss of an employment-generating use. In relation to the criteria set out in Policy EM3 of the Local Plan, the site is highly sustainable and can be accessed by a choice of means of transport.

Given the prolonged vacancy status of the application property, the C1 use is no longer a viable use and is instead resulting in a severe underutilisation of the site. The prolonged vacancy status of the property also indicates that it is not seen as desirable for redevelopment for employment uses by other potential developers.

Whilst potential continued employment use of the site would not particularly detrimentally affect the amenity and character of the surrounding residential area, it would be much more appropriate for a compatible residential use to be implemented at the site. As opposed to retaining the site for use as employment land, the proposal would be more materially beneficial to both the local area and the Council's aim to provide additional housing.

Due to the above, it is considered that the proposal is not in conflict with Local Plan Policy EM3.

- **Housing**

The proposal would result in a wholly residential use at the site, which would bring it in alignment with the broad objectives of Policy H1 by contributing to meeting the housing needs within the Borough.

It is acknowledged that, in providing only 1-bedroom flats, the proposal conflicts with Policy H2 of the Local Plan as it does not contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan. However, Policy H2 does state that the mix of housing should be provided "where possible" and it is considered that, in this case, the listed nature of the application property restricts the possibility of being more flexible with the unit sizes as the significance of the heritage asset may be harmed.

Additionally, it is considered that the benefits of bringing the property back into an active and viable use outweighs any deficiencies of not providing a mix of unit. Providing seven self-contained units represents maximum efficient use of the available space at the property as this is the highest number of a unit type that can be reasonably achieved at the site.

In regard to an affordable housing contribution, please refer to the submitted viability assessment, which concludes that the scheme can be considered policy compliant without an additional contribution towards the provision of any affordable housing.

The proposal is also in accordance with Policy H10 as it provides ample communal outdoor space for the future occupants. Taking into account the pre-application advice received, the amount of proposed communal outdoor soft landscaping areas has been maximised and now measures 355.84 sqm in total. This is possible due to the generous size of the application site.

- **Heritage**

Given the Grade II listed building nature of the application property, the proposed development has been put together to ensure that no harm would be done to the character and significance of the property or the conservation area.

This is demonstrated in thorough detail in the submitted Heritage Impact Statement, which concludes that, as the proposed works primarily concern post-construction elements whilst historic features will be retained, repaired, or reinstated, the proposal will not result in loss or harm to historic or significant fabric.

Rather, the proposal will provide substantial heritage benefit and will be a positive impact on the character and appearance of the streetscape and conservation area through the proposed landscaping.

The proposal is therefore in accordance with Chapter 16 of the NPPF and Local Plan policies EN1, EN3, and EN6.

- **Amenity Impact**

The proposed development will not be detrimental to the amenity of existing neighbouring residential properties and will not result in poor living conditions at the proposed residential flats. The proposal is appropriate and in keeping for its location as the vicinity of the application site already features a high number of residential uses.

The total number of seven occupants to be served by the proposed flats is not a substantial intensification at the site, given that the application property had operated for a time as a hotel serving a higher number of guests on a regular basis. Therefore, the proposal will not result in undue noise and disturbance or a substantial amount of comings and goings.

Due to the lack of significant external works, the proposal will not introduce any incongruous or dominant additions to the property, preserving the character and significance of the heritage asset and the setting. The lack of proposed extensions also ensures that impact is not generated for neighbouring residential properties in terms of harm to privacy, overlooking issues, or harm to outlook and access to daylight/sunlight.

Whilst low level lighting is proposed in order to improve visibility of the route to the application property, the lighting would not be strong enough to generate much light pollution.

The proposal is considered to be in alignment with Policy CC8 of the Local Plan.

- **Transport Statement**

Frequent bus services can be accessed at bus stops located on the Tilehurst Road within easy walking distance of the site; the application site is therefore highly sustainable. The site also benefits from a direct vehicular access off the Tilehurst Road and informal parking to the front and rear of the building.

The LPA's Revised Parking Standards and Design Supplementary Planning Document states that the parking requirement for a 1-bedroom unit in zone 2 is 1 space. Whilst seven parking spaces had been proposed at pre-application stage and thus had been policy compliant, this has now been reduced to only three parking spaces.

This is in line with the pre-application written advice, which states that a reduction in car parking spaces would be acceptable in order to provide the future occupants of the proposed flats with ample communal outdoor space to the rear of the site. It is considered that, given the fairly central location of the site and its sustainability, the reduction in car parking spaces to provide a higher level of soft landscaping is acceptable and would provide a better quality of life for future occupants.

Regarding parking permits, the applicant is amenable to a planning condition being attached that disallows future residents of the proposed units from applying for a residents parking permit for the surrounding residential streets. It is accepted that this will help ensure that the proposed development does not exacerbate existing high levels of on-street car parking pressure.

The proposal also includes eight cycle parking spaces utilising Sheffield Stands. This is more than sufficient to comply with the Borough's Parking Standards and Design SPD, which seeks a minimum provision of 0.5 cycle storage spaces per flat.

Due to the high sustainability of the application site, it is considered that a full Transport Statement is not required. The proposal complies with Local Plan Policy TR5.

- **Climate Change**

Due to the Grade II listed nature of the application property, there is very limited scope for the proposal to incorporate measures that encourage the property's adaptation to climate change.

Nevertheless, trees will be maintained on the application site, which will provide shading of the proposed communal external amenity area.

- **Sustainability Statement**

The importance of sustainable design and construction is acknowledged; however, similar to the above paragraphs regarding climate change, the application property's status as a Grade II listed building significantly restricts the implementation of reasonable sustainability measures.

This is acknowledged by paragraph 3.5 of the Sustainable Design & Construction SPD, which states that applications affecting some heritage assets may have difficulty in achieving the required standard and that requiring compliance with standards over and above Part L of the Building Regulations where it would clearly conflict with heritage conservation policies would not be appropriate. Only improvements insofar as is possible would be sought.

A BREEAM Domestic Refurbishment Pre-Assessment has been submitted as part of this application; a rating of "Very Good" has been targeted and the pre-assessment's analysis of the potential of achieving this rating is favourable. Therefore, the proposal is considered to be in line with Policy CC2 of the Local Plan.

The following is a response to each of the points within Table A1.1 checklist of the Sustainable Design & Construction SPD.

### **Energy/CO2**

1. As the proposal relates to a Grade II listed building, opportunities to optimise the use of energy from the sun and limit heat losses are limited.
2. As the proposal relates to a Grade II listed building, incorporating additional windows is not possible. Nevertheless, natural daylighting and ventilation will be optimised through the proposed refurbishment of windows and energy-efficient LED lighting will be used internally and externally.
3. Whilst there is little scope to change the design of the listed building to make efficient use of energy, it should be noted that Building Regulations requirements for U-values are substantially higher for existing buildings than for new builds.
4. There is no scope for local energy generation from renewables and/or decentralised energy to be included in the proposal.
5. Whilst not in a cycle shed, cycle parking provision has been provided.
6. Policy H5 relates to standards for new build housing. The proposed development involves the conversion of an existing hotel into seven self-contained flats and therefore does not constitute new build housing. Nevertheless, the proposal does satisfy relevant parts of policy H5, such as adhering to the nationally described space standards.
7. A Section 106 is not required for the proposed development.

### **Water**

8. Within the constraints posed by the listed building, it would be possible to incorporate water saving devices such as cistern bags, dual flush toilets, low flow aerators on taps and showers, and water-efficient white goods.

9. There is minimal opportunity to incorporate rainwater recycling and reduce the use of potable water due to the listed building nature of the property. Where possible, permeable surfaces will be included in external landscaping to aid water management.

10. Similarly, the collection, treatment and re-use of grey water cannot be easily incorporated as the listed building provides little opportunities for this.

### **Materials**

11. The proposal does not feature significant external changes in order to preserve the significance of the heritage asset. Therefore, there is no scope to incorporate materials that could contribute towards sustainability. The proposed development retains the existing building, reducing embodied carbon associated with demolition and reconstruction.

### **Surface Water Run-off**

12. The application site is located in Flood Zone 1 and has a low probability of flooding from rivers and the sea. According to the Environment Agency's maps, the site has a very low risk of surface water flooding and flooding from either groundwater or reservoirs is unlikely in this area.

Flood risk measures, therefore, either for the benefit of the application property or nearby locations are not required. The proposed development does not feature the addition of impermeable surfaces at the site. The site is also not at particular risk of other forms of pollution and environmental damage.

13. Whilst the use of sustainable drainage systems has been considered, it would ultimately not be practical to incorporate sustainable drainage systems or measures into the proposal.

14. The proposal complies with policy EN18 as the development is proposed in an area with a low risk of flooding in the first instance.

### **Waste**

15. To minimise waste sent to landfill, the proposal includes recycling bins with appropriate capacities and encourages recycling.

16. In terms of construction and demolition waste, only minimal waste will be generated as only limited external works are being proposed. Due to the type of waste generated, there is little scope for reuse.

17. The proposed development will not include re-used and recycled materials in the first instance.

18. Provision for the storage and recycling of waste for all users is located to the side of the application site. Taking into consideration that the proposal involves seven self-contained flats, the proposal provides a general waste bin with a capacity of 1100L, a recycling bin with a capacity of 1100L, a second recycling bin with a capacity of 660L, and a food waste bin with a capacity of 180L.

### **Pollution**

19. In regard to noise pollution, the submitted Noise Impact Assessment has identified noise mitigation measures (e.g. specification details as appropriate for sound insulation treatment to the separating walls and separating floors) that will be implemented to ensure that the proposal does not generate unacceptable noise pollution.

In relation to light pollution, this will be avoided by utilising energy-efficient, downward-facing external low level lighting.

20. The development will comply with air quality standards, including low-emission heating systems.

21. The proposed external works are modest in scope and will not result in the release of any significant pollution into the atmosphere.

### **Health and Well-being**

22. The majority of the proposed flats will benefit from well-positioned windows providing the interior with an ample amount of natural daylight. Whilst Flat 2 on the lower ground floor has its level of outlook and access to day/sunlight affected to some extent by the limited size of the windows on the southern elevation, it would be difficult to rectify due to the listed nature of the application property, which restricts the extent to which external changes can be made to the property.

Acoustic insulation will help reduce noise generation; the proposal in any case does not introduce a significant intensification at the site given that only seven future occupants in total would be accommodated and this would further reduce potential noise impact.

Due to the generous size of the application site, it has been possible to provide a significant amount of communal outdoor space to the rear of the site for the benefit of future residents. This area measures 355.84 sqm in total.

### **Management**

23. The proposed development does not feature any significant construction works; environmental impacts as a result of construction work is therefore not a concern.

24. To ensure people feel safe and secure, the proposal features appropriate lighting, secure entry systems, CCTV cameras, and well-lit access points.

### **Ecology**

25. Wildlife habitats have not been identified on the application site. In terms of natural features, the proposal includes communal outdoor space that consists of an ample amount of soft landscaping. This is a positive contribution towards enhancing the natural features of the application site and enhancing biodiversity.

- **Air Quality**

As the application site is located within an Air Quality Management Area and the proposed development would introduce a C3 residential use, an Air Quality Assessment has been submitted.

The report concludes that Air Quality does not present a constraint for the grant of planning permission. The report identifies relevant mitigation measures that would be adhered to. It is considered that the proposal complies with Local Plan Policy EN15.

- **Biodiversity Net Gain**

The proposal concerns the conversion of an existing building with no additional floor area to be created; there is also a substantial amount of hardstanding at the site with very little existing on-site habitat consisting of patches of grass. Given these factors, the proposed development will not lead to a loss in existing on-site habitat and is therefore exempt from the requirement to provide a BNG of 10%.

Nonetheless, due to maximizing the amount of proposed communal outdoor soft landscaping area, the proposal will still result in a significant increase in biodiversity at the application site over the current situation. This brings the proposal in line with Policy EN12.

- **Waste**

In terms of waste and recycling, the Council's Household Waste Collection Service information has been consulted. Taking into consideration that the proposal involves seven self-contained flats, the proposal provides a general waste bin with a capacity of 1100L, a recycling bin with a capacity of 1100L, a second recycling bin with a capacity of 660L, and a food waste bin with a capacity of 180L.

An opening close to the waste and recycling bin area is proposed to be reinstated; this would ensure that provided bins would be within 10m of a kerbside collection point. Currently closed off by brickwork, below is a streetscene image from 2020 showing the opening that is proposed to be reinstated:



- **Security**

In relation to safety and crime prevention, CCTV cameras will be installed at the site and the main entrance into the property will be a PAS 24 rated door. Entry into the building will utilize a secure entry system that only permits future occupants of the proposed flats.

Low level lighting is proposed to ensure that visibility is maintained along the route into the building during darker hours of the day.