

DELEGATED APPLICATION REPORT

Application No's: 24/1500

Address: Marshalls Garage, Oxford Road, Tilehurst, Reading

Proposal: Development of 32 dwellings, including 10 affordable housing units with associated parking and landscaping following the demolition of the existing buildings

Case officer: Ethne Humphreys

Decision date: 18/02/2025

Site Description and Surrounding Area:

The application site relates to land to the northeast side of Oxford Road. The site comprises the former Charters/Marshalls Car garage and associated showroom, workshop and wash bay.

The surrounding area is predominantly residential, with large, detached properties on the south side of Oxford Road, flats to the northwest and the Roebuck Hotel to the northwest and the railway line immediately to the north of the site.

The site is within an Air Quality Management Area, Green Link, 'Treed Corridor' and area of Contaminated Land.

The site is an allocated site for housing.

Proposal:

This application seeks planning permission for the erection of 32 dwellings following demolition of existing garage buildings on site.

The proposals would comprise 4 blocks of 8 units each, comprising 8 x 1 bed flats, 20 x 2 bed flats and 4 x 3 bed flats.

10 affordable housing units are proposed.

44 car parking spaces are proposed: 32 at basement level and 12 at surface level. Indicative landscaping is shown, with 20 cycle parking spaces and bin storage.

Materials would comprise:

Mixed red stock facing brick
Plain clay tiles to pitched roof
Plain clay wall tile hung
Zinc to rear dormer windows
Upvc windows and doors
Glass balustrades

Plans and documents submitted

Air Quality Assessment prepared by Redmore environmental Ref: 8470r1 dated 18 October 2024

Arboricultural Impact Assessment prepared by PCA Landscape Ref: P.2103.24 dated October 2024

Character Study prepared by sawkings architects dated October 2024

Design and Access Statement prepared by sawkings architects dated October 2024

Ecological Impact Assessment and Biodiversity Net Gain prepared by windrush ecology date September 2024

Geo-Environmental Assessment prepared by WDE consulting Ref: 21283R1 (Issue A) dated May 2024

Flood Risk Assessment and SuDs report document number C3411-R1-Rev B dated November 2024

Noise Impact Assessment prepared by accon uk dated 08.11.2024

Planning Statement prepared by Nova Planning dated 24 October 2024

Sustainability and Energy Statement prepared by bluesky dated 21 October 2024

Transport Statement prepared by i-Transport Ref: ITB200269-001B TS dated 23 October 2024

OS Map and Location DWG 0001 Rev P1

Existing Site Plan DWG 1000 Rev P1

Topographical Survey 21202/P/01 dated 12/12/23

Topographical Survey 21202/P/02 dated 12/12/23

Proposed OS Map and Location DWG 0002 Rev P1

Proposed Site Plan Ground Floor Plan DWN 3001 Rev P1

Proposed Site Layout Roof Plan DWG 3000 Rev P1

Proposed Basement Level Blocks 1 and 2 DWG 3100 Rev P1

Proposed Ground Floor Plan Blocks 1 and 2 DWG 3101 Rev P1

Proposed First Floor Plan Blocks 1 and 2 DWG 3102 Rev P1

Proposed Second Floor Plan Blocks 1 and 2 DWG 3103 P1

Proposed Roof Plan Blocks 1 and 2 DWG 3104 Rev P1

Proposed Elevations (North and East) Blocks 1 and 2 DWG 3201 Rev P1

Proposed Elevations (South and West) Blocks 1 and 2 DWG 3200 Rev P1

Proposed Ground Floor Plan Block 3 DWG 3105 Rev P1

Proposed First Floor Plan Block 3 DWG 3106 Rev P1

Proposed Second Floor Plan Block 3 DWG 3107 Rev P1

Proposed Roof Plan Block 3 DWG 3108 P1

Proposed Elevations (South and West) Block 3 DWG 3202 P1

Proposed Elevations (North and East) Block 3 DWG 3203 Rev P1

Proposed Ground Floor Plan Block 4 DWG 3109 P1

Proposed First Floor Plan Block 4 DWG 31130 Rev P1

Proposed Second Floor Plan Block 4 DWG 3111 Rev P1

Proposed Roof Plan Block 4 DWG 3112 Rev P1

Proposed Elevations (East and South) Block 4 DWG 3204 P1

Proposed Elevations (North and West) Block 4 DWG 3205 Rev P1

Proposed GA Sections Block 1 DWG 3301 Rev P1

Proposed GA Sections Block 2 DWG 3302 Rev P1
Proposed GA Sections Block 3 DWG 3303 Rev P1
Proposed GA Sections Block 4 DWG 3304 Rev P1
Proposed Landscape Layout P 210324LD1
Proposed Bin Storage DWG 3400 Rev P1
Proposed Cycle Storage DWG 3401 Rev P1
Proposed Site street Elevation – Oxford Road DWG 3206 Rev P1
Proposed Site Street Elevation – Oxford Road DWG 3207 Rev P1

Relevant Planning History:

190984 – Demolition of old workshop building and construction of new workshop building – approved.

141417 - Erection of a two and a half storey building with car parking comprising of 6 apartments (4 x 2 bedroom and 2 x 1 bedroom) – withdrawn.

Internal Consultation Responses:

Ecologist: No objection subject to conditions. Discussed below.

Environmental Protection Officer: OBJECT. Discussed below.

LLFA: OBJECT. Discussed below.

Natural Environment Officer: OBJECT. Discussed below.

Transport Officer: OBJECT. Discussed below.

Waste: Insufficient bins. Discussed below.

External Consultation Responses:

Network Rail: No objection in principle, subject to development not adversely impacting on safety, operation and integrity of operational railway – liaison with Network Rail required.

Thames Water: No objection in principle, subject to design of new network ensuring no discharge/cause flooding – sustainable surface water strategy should be agreed with LLFA.

Neighbours

Four site notices were displayed at the site.

Two neighbour letters of objection received, concerned with:

- Conflict with site allocation in terms of numbers, access, character and tree planting
- Cramped appearance and impact on character of area
- Overlooking
- Lack of neighbour notification

This decision is proceeding under delegated powers, as per alterations to the scheme of delegation (as agreed at Policy Committee 27/4/20). This allowed major planning applications, recommended for refusal by officers, to be determined under delegated powers, rather than be considered by the Planning Applications Committee.

Summary of discussions with applicant/agent

The agent was advised of concerns and the applicant confirmed they wanted to receive the decision notice. No formal pre-application advice was sought from the LPA prior to the submission of this application.

Equality Act 2010:

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

Relevant Planning Policy and Guidance

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 2019 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).

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

National Policy and Guidance

National Planning Policy Framework 2024

- 2. Achieving sustainable development
- 5. Delivering a sufficient supply of homes
- 7. Ensuring the vitality of town centres
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment

National Planning Practice Guidance (2014 onwards) (PPG)

Reading Borough Local Plan 2019

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design and Construction
- CC3: Adaptation to Climate Change
- CC4: Decentralised Energy
- CC5: Waste Minimisation and Storage
- CC6: Accessibility and the Intensity of Development
- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- CC9: Securing Infrastructure
- EN9: Provision of Open Space
- EN12: Biodiversity and the Green Network
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- EN16: Pollution and Water Resources
- EN18: Flooding and Drainage
- EM3: Loss of Employment Land
- 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
- WR3r: Charters Car Sales, Oxford Road

Supplementary Planning Documents & other relevant documents/guidance

- Reading Borough Local Plan Pre-Submission Draft Partial Update, November 2024
- Affordable Housing SPD (2021)
- Revised Parking Standards and Design SPD (2011)

Sustainable Design and Construction SPD (2019)
Revised SPD on Planning Obligations under Section 106 (2015)
Reading Tree Strategy (2021)
Reading Biodiversity Action Plan (2021)
Employment Skills and Training SPD (2013)
National Design Guide: Planning practice for beautiful, enduring and successful places (2019)

Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024.

Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

Officer advice is that the Local Plan policies listed above remain in accordance with national policy – and that the objectives of those policies remain very similar in the draft updated Local Plan – other than Policy H1 which is now out of date. In this respect, regard will be had to national policy.

Appraisal

Land Use Considerations

The wider principle of re-development of this site is established under Local Planning housing allocation Policy WR3r which allocates the site for residential development as follows:

Development should:

- *Provide access to the site from Lippincote Court;*
- *Avoid adverse visual impacts on views from the north side of the Thames and on the Thames Valley major landscape feature;*
- *Avoid detrimental impacts on the wildlife value of adjoining wooded areas;*
- *Address air quality impacts on residential use;*
- *Address noise impacts on residential use;*
- *Address any contamination on site; and*
- *Take account of the two-storey character of houses south of Oxford Road.*

Site size: 0.33 ha 12-18 dwellings

Provision of housing is welcomed in general. However, this is subject to the more detailed consideration of relevant Local Plan Policies and the context of the application site and it remains important that the 'right' housing is provided in a manner which balances social, economic and environmental aims.

Policy WR3r identifies an indicative amount of development of 12 to 18 dwellings is given under that policy. The proposed figure of 32 units is significantly higher than this. The supporting text to the Policy at 7.3.13 states:

“where dwelling or floorspace figures are included alongside the allocations, these are intended as a guide, and usually reflect an indicative maximum capacity”. It further states that “the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. The fact that a site is allocated in WR3 does not preclude the need to comply with all other policies in the local plan.”

As will be discussed below, the excessive density of the proposal is problematic and is indicative of the overdeveloped nature of the scheme.

Affordable Housing

Policy H3 (Affordable Housing) seeks to ensure that development proposals of more than 10 dwellings should provide the equivalent of 30% on-site provision of affordable housing. This is in order to meet identified housing needs and to contribute towards sustainable, inclusive and mixed communities. There is a significant shortfall in provision of Affordable Housing compared with identified need.

The Council's Affordable Housing SPD (2021) requires that new development should include a range and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs. Specifically, the SPD identifies a tenure mix of 38% shared ownership and 62% rented, with rented allowed to be Affordable rent but capped at 70% of Market Rent ('Reading Affordable Rent') is required to meet the Borough's most pressing needs

The scheme proposes 10 units as affordable housing, which in itself would be policy compliant. The applicant's Planning Statement notes that discussions with the Council's Housing team would begin upon validation of the application. The Council's Housing team have confirmed that they have not received any proposal regarding mix, tenure and location of the affordable housing units for consideration, and which have not been agreed. However, given the significant concerns raised by the proposals, this has not been pursued.

The Berkshire SHMA examined the need for different sizes of both market and affordable accommodation and concluded that around 90% of the need for affordable homes in Reading was for two-bed or more, and 60% was for three-bed or more. Since the SHMA was published in 2016, this need has only been exacerbated by recent affordable delivery, which has been mainly for one- or two-bedroom properties. As noted elsewhere in this report regarding mix, the proposal would not be policy compliant in this respect.

Should the application have otherwise been recommended for approval, the affordable housing units would have been secured via S106 legal agreement.

Without an acceptable level of affordable housing have been agreed and secured via S106 legal agreement the proposal is contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and paragraph 64 of the NPPF 2024.

An informative will specify that this reason for refusal could be overcome, in the context of an acceptable scheme in all other respects, by entering into a S106 legal agreement.

Mix

The proposed scheme is for 8x1 bed flats, 20x2 bed flats and 4x3 bed flats. As per the wording of Policy H2 (Density and Mix), on new developments for 10 or more dwellings (such as this proposal for 32 units) outside the central area and defined district and local centres (with this site outside these areas) planning decisions will ensure that over 50% of dwelling will be of 3 bedroom or more, having regard to all other material considerations.

The proposal provides 12.5% 3-bed units, significantly below the 50% rate. The submission states that it is not feasible nor viable for this site to come forward with the required housing mix. Whilst paragraph 4.4.10 of the supporting text to Policy H2 does

set out that other material considerations, such as viability, could form a basis for deviating from the policy requirement, no viability report has been submitted, and no specific evidence has been supplied to justify deviating from the policy requirements which are based in evidence of local housing need. The proposals therefore fail to meet identified local housing need and are contrary to Policy H2 and paragraphs 61 and 129 of the NPPF 2024.

Design Considerations and Impact on Character of Surrounding Area

Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments. Policy H10 (Private and Communal Outdoor Space) of the states that the design of outdoor areas will respect the size and character of other similar spaces in the vicinity.

Paragraph 96 of the NPPF 2024 states that decisions should aim to achieve healthy, inclusive and safe places.

Paragraph 129 of the NPPF 2024 states that decisions should support development that takes into account the importance of securing well-designed, attractive and healthy places.

Paragraph 131 of the NPPF 2024 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

Paragraph 135 of the NPPF 2024 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment.

Paragraph 136 of the NPPF 2024 details that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

Paragraph 139 of the NPPF 2024 details that development that is not well designed should be refused.

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

There is no in-principle objection to the loss of the garage buildings in design terms. They are not considered to be of any specific or special architectural merit to warrant their retention and their loss in itself is accepted within the site allocation. As such, the demolition of existing commercial buildings at the site is considered acceptable in design terms, subject to the replacement buildings being appropriate in all other respects. It is considered that there is scope for increased scale in this location. However, this needs to be of a carefully considered design to ensure that new development maintains and enhances the character of the area. In contrast, this particular proposal would appear cramped and overly dominant, and the proposed scale and layout would result in other concerns set out below.

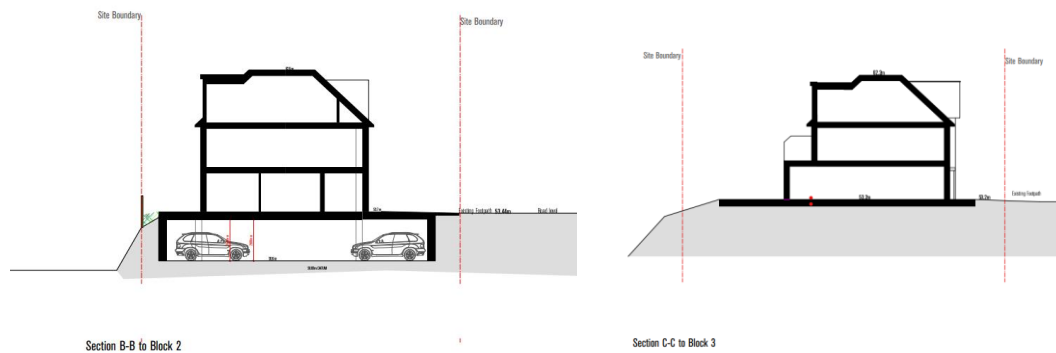
As can be seen from the proposed site plan, and whilst indicated soft landscaping is shown, there would be a dominance of built form and hardstanding across the site. The layout would appear cramped with limited space around the buildings for meaningful soft landscaping. The car park area to the east of Block 4 would have a stark appearance, as would the road and access ramp between Blocks 2 and 3.

Bin storage is proposed at the front of the site close to the highway – the bin storage for Blocks 3 and 4 in particular would be located immediately adjacent the highway. This is not considered a good design solution and combined with the cycle storage proposed adjacent the site frontage, would add to the visual intrusion of built form within the street scene.

The proposed site plan below illustrates the extent of built form and hardstanding across the width (and depth) of the site:



The site plan, and proposed section drawings below (Blocks 2 and 3) illustrate the cramped relationship between the building and the rear boundary (railway embankment) of the site:



As discussed elsewhere in this report, there are concerns regarding the proposed landscaping to the rear given the limited space, the need for residential access and additional shading meaningful planting would bring (and impact on amenity). Whilst trees are indicatively shown along the site frontage, it not clear that there would be sufficient space for meaningful soft landscaping. There would be insufficient ‘greenery’ within the site, and the hardstanding would be unrelenting in places. This, together with the generally cramped layout, is a strong indicator that the proposals would be an overdevelopment of the site.

The supporting planning statement makes reference to the proposed scheme following the existing street line and scale of 1030 and 1040 Oxford Road to the northwest of the site. The southwest side of Oxford Road, opposite the site, comprises largely of detached dwelling in deep plots and of a much lower density. Whilst the development to the north west is recognised and added a new element to the character of this part of Oxford Road, it is not considered to define the character. Indeed, the site allocation policy makes specific reference to proposals taking account of the two storey character of Oxford Road. It is noted that Blocks 1 and 2 would have a similar building line to the development to the northwest. However, Blocks 3 and 4 would be quite significantly further forward of Blocks 1 and 2 (and that to the north west) and closer to the highway. Most of the width of the plot would be infilled with built form and hardstanding. Whilst the height of the blocks might be comparable to the development to the northwest, the proposed development would be wider and deeper and the increase in amount, massing and scale of the blocks, would result in a very visually dominant and cramped form of development in a prominent location. In essence the proposal incorrectly takes the largest nearby development as a reference point and exceeds even those parameters in both scale and visual impact.

In terms of architectural style, this would not be too dissimilar to the flats to the north west and there would be a degree of consistency in terms of materials with the use of brick and other traditional materials. However, the buildings would appear bulky, due to their scale, exacerbated by proximity to the main road.

The proposal, due to the scale, massing and poor arrangement of car parking and landscaping would not sit cohesively in the immediate area and would not therefore make a positive contribution to the character and appearance of the area. It would represent a harmful addition that would relate poorly to surrounding development and the wider character and appearance of the area.

As above, the site is adjacent the railway line. Whilst Network Rail have not raised an in-principle objection to the proposals, it is apparent that significant work would be required with Network Rail to demonstrate that the site would be feasible. That such significant excavation is required to facilitate car parking is another indication of the cramped and overdeveloped nature of the proposals.

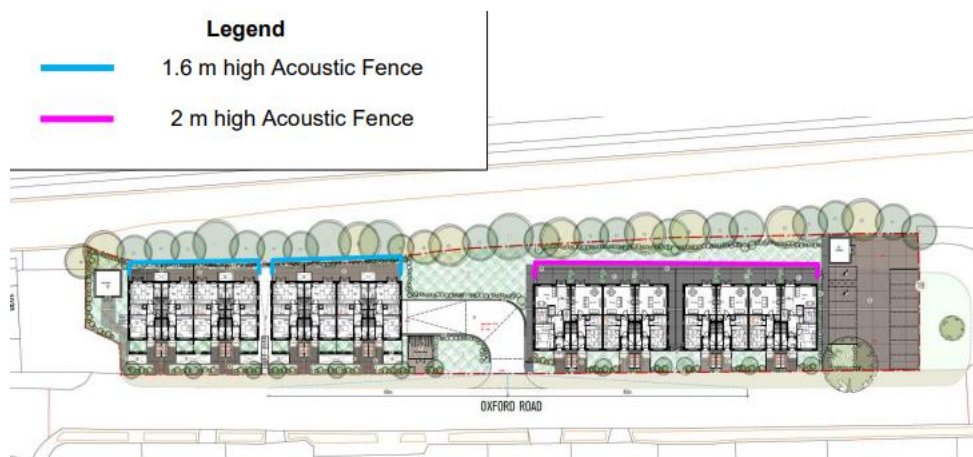
The proposals would be contrary to Policy CC7 of the Reading Borough Local Plan 2019 and paragraphs 96, 131, 135 and 136 of the NPPF 2024. Having regard to NPPF paragraph 11(d)(ii) the proposal fails to secure a well-designed place.

Amenity of Future Occupiers

Policy CC8 (Safeguarding Amenity) states that development will not cause unacceptable living conditions for new residential properties. Policy H5 (Standards for New Housing) seeks that all new building housing is built to high standards and Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.

The proposed schedule of accommodation indicates the dwellings would comply with National Space Standards and Policy H5 in terms of size.

With regard to Block 1 ground floor Flat 1, the site plan shows a communal plant room immediately next to window of bedroom 1 and indicates an external lift to/from the basement car parking to ground level sited near on in front of bedroom 2 and this would result in unacceptable noise and disturbance to occupiers of this unit. Similarly, the road and cycle storage sited to the east of Block 2 ground floor units is likely to result in unacceptable noise and disturbance/headlights and to a lesser extent the same for the ground floor units of 'Block 3'. There would be little defensible space to ground floor units. Ground floor rear units are also considered to have limited light levels – particularly to Blocks 1 and 2 – given the close proximity to rear boundary trees. With regard to Blocks 1 and 2 in particular, the short distance from the rear elevation to the rear boundary (and combined with proximity of trees) is likely to have an oppressive effect on occupiers. Furthermore, as discussed elsewhere, acoustic fencing between 1.6m and 2m high is proposed to the rear reduce noise levels. This would add to the oppressive nature, resulting in future occupiers of these units feeling 'hemmed in' with a poor outlook.



The units would all be single aspect and given concerns raised above, it is not clear whether there would be sufficient daylighting to all rooms, noting no daylight/sunlight report has been submitted. This would be contrary to Policy CC8 of the Reading Borough Local Plan 2019 and paragraphs 135 and 198 of the NPPF 2024.

In terms of garden amenity, it is noted that the green space/strip to the rear of Blocks 3 and 4 is proposed for all residents with paragraph 23 of the DAS stating *'The stretch of green to the rear allows for residents to enjoy an outdoor walk in a shared amenity space, for use of the residents only. This is accessed from the street level and continues through the car parking area'*. From review of the site plan and landscape layout plan, a continuous walk in a loop would require walking alongside the car park and on the Oxford Road pavement. It seems unlikely that residents would do this and seems more likely that the green strip would end up being exclusively used by the ground floor residents of Blocks 3 and 4. Given the limited space between the rear of the blocks and the rear boundary, combined with proximity of trees and proposed acoustic fencing, this is not likely to be of any 'functional' or 'relaxing' use to future occupiers and would be an oppressive and dark environment. The Design and Access Statement states that users of the ground floor units would store bikes in their rear garden spaces – any storage would further reduce available space. The applicant notes that residents would have access to a public Arthur Newbery Park nearby. This is acknowledged; however, this is public space would not provide public or functional spaces for the range of uses set out in Policy H10.

The Designing Out Crime Officer has also raised a number of issues with the proposed design from a designing out crime perspective. Concerns relating to the proposed basement providing an unsecure environment that could attract crime and antisocial behaviour could have been dealt with via condition requiring details of ie. appropriate access gates/ /lighting/cctv. Concerns relating to lack of natural active surveillance of the surface level car park (adjacent Blocks 3 and 4) could have been dealt with revised plans including additional windows to the flank elevation of Block 4. Similarly, conditions could have secured details of security measures in respect of the car park.

The cycle storage area proposed front centre of the site would not be well overlooked and would be remote from a number of units. As discussed elsewhere, it is not clear whether the storage would be physically secure.

The layout of units within Blocks 1 and 2 offers no active surveillance of the front of the site and there would be no natural surveillance of the plant room area in the north west of the site.

Whilst a robust security strategy could be conditioned, it is not considered that the proposals currently acceptably demonstrate a safe and accessible environment and retro-fitted security measures are at risk of appearing unattractive and poorly integrated.

Noise

A noise report has been submitted with the application, which is necessary due to the site's location between the busy Oxford Road and railway line.

It is noted that the proposal referred to in the noise report makes reference to a proposal for 16 residential units, and not the 32 units proposed. Therefore, it is not clear that it is all applicable to the application, or can be relied upon

The noise levels on both facades of the proposed development would be high due to road noise at the front and rail noise at the rear. As such, there would be no 'quiet side'.

The noise assessment demonstrates external noise levels within all proposed amenity areas to rear would exceed target noise levels. Whilst acoustic fencing between 1.6m and 2m high acoustic fencing is proposed, as above, this raises concerns in respect of amenity, hemming occupiers in. Furthermore, the assessment (to the extent that it is relevant to the scheme) acknowledges that even with the acoustic fencing it would not be possible to achieve target levels in all external amenity areas due to high railway noise levels. As above the applicant notes residents would have access to a public park (Arthur Newbery Park) and consider that this would provide an acceptable alternative for amenity of residents. This is not accepted as it does not address the requirements of Policy H10 for space *within* the development, does not address the noise which will affect occupiers when they are unable to use the park and fails to acknowledge the general impracticalities of having amenity space located off site.

It is considered that the above concerns add to the poor quality of accommodation for future occupiers.

The Council's Environmental Health Officer considers that a redesign of the layout should be explored to reduce the noise exposure.

The option of mechanical ventilation is mentioned. This would be required as trickle vents would be unlikely to provide sufficient ventilation to prevent overheating. However, it is

not considered that noise could be acceptably mitigated through submission of further details way of condition given the concerns raised in this respect. It is noted that the site allocation policy specifically requires for noise impact to be addressed, and it is not considered appropriate to leave to condition.

The above further highlights the cramped and overdeveloped nature of the proposals, and in overall terms the proposal would not provide a good quality living environment, contrary to Policies CC8, H5 and H10 of the Reading Borough Local Plan 2019 and paragraphs 135 and 198 of the NPPF 2024.

Environmental Health

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

A Geo-Environmental Assessment has been submitted with the application. It is noted that the proposal referred to in the document makes reference to a proposal for 11 houses and 8 flats, and not the 32 units proposed. Therefore, it is not clear that it is all applicable to the application or can be relied upon.

The site investigation submitted identifies that a remediation strategy would be required due to the presence of contaminants, underground storage tanks and gas risk. Further investigation would be required before this remediation strategy could be designed. It is possible that there would need to be changes to the proposed layout depending the finding of the investigation/decommission of the tanks.

The Council's Environmental Health Officer considers that this further investigation should be carried out prior to any planning permission being granted as the risks have not been fully identified yet due to the presence of buildings on site and the tanks.

It is noted that the site allocation policy specifically requires for contamination to be addressed, and it is not considered appropriate to leave to condition.

Policy EN15 (Air Quality) seeks that development should have regard to the need to improve air quality and reduce the effects of poor air quality.

As above, the site is located within an air quality management area. The submitted assessment concludes that the levels of pollutants across the site would be below objective limit values and due to the size of the development it would be unlikely to have a significant impact on air quality. The Council's Environmental Health Officer has raised no concern in this respect. It is noted that the site allocation specifically requires for contamination to be addressed, and it is not considered appropriate to leave to condition.

Impact on Neighbour Amenity

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

The proposed building would be sited at least 20m from the properties on the opposite south west side of Oxford Road. This is considered to be an acceptable relationship, that would not result in any overbearing effects. Similarly, given the distance, no material loss of privacy is considered to arise (and noting that these properties are at a slightly higher level due to change in site levels).

Given the distance of at least 15m from Block 1 to 1030 Oxford Road to the north west, no overbearing effects are considered to arise. First floor windows are proposed on the north west flank elevation of Block 1. However, 1030 Oxford Road does not feature windows on its south east flank elevation and given the proposed windows would be bathroom or secondary, they could have been conditioned to be obscurely glazed if privacy was a significant concern. Given the distance, no material loss of privacy is considered to arise.

The construction phase of the proposed development would have potential to impact on the amenity of surrounding occupiers. Should the application have otherwise been supportable, conditions would have been recommended to secure submission and approval of a demolition and construction method statement and to control construction hours to mitigate potential noise and dust impacts on the surrounding area.

Natural Environment - Trees/Landscaping

Policy EN14 (Trees, Hedges and Woodland) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks proposals should include appropriate landscaping.

Trees to the rear of the site (on Network Rail land) are subject to Woodland TPO 126/07. The site is on a 'treed corridor' and within an Air Quality Management Area. As such, tree retention and planting is a high priority, particularly on the frontage, and proposals should demonstrate an appropriate level of greening and/or net gain in the tree number. The site also forms part of a Green Link.

Paragraph 136 of the NPPF 2024 details that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

The plans indicatively show trees. With reference to the Arboriculture Impact Assessment, ref Ref: P.2103.24, dated October 2024:

5.10 states that: *'There are also a number of levels changes within the site, in some places up to c.2m. It is anticipated that a significant groundwork exercise will be required to make the site development ready'*

It is unclear as to the extent or nature of these works and clarity would be required. Without clarity on level changes required, the Natural Environment Officer confirms it is not possible to be certain about the impact on trees.

As noted elsewhere, the proximity of the blocks to the rear boundary (and consequential impact on amenity) would be likely to result in pressure to prune the off-site TPO trees.

Indicative landscaping has been shown. The inclusion of a native hedge on the rear boundary is positive, as is the inclusion of trees and other planting. However, as above, the feasibility of tree planting is not clear given impact on amenity. To the front, whilst trees are indicated, they would likely need to be extremely fastigate trees to avoid conflict with Blocks 1 and 2. The landscaping plan provides no details on what these might be other than 'ornamental' which is a concern in itself as indicates non-native when native and wildlife friendly should be the default. As such the LPA cannot be certain that suitable trees can in fact be accommodated successfully to the frontage. Overall, there are concerns due to insufficient details to demonstrate a lack of harm to trees of high amenity value, including protected trees, and insufficient provision of meaningful soft landscaping. The lack of space for meaningful planting as required in this location is symptomatic of the cramped overdeveloped nature of the proposals.

The proposed development fails to demonstrate lack of harm to trees of high amenity value including protected trees. Furthermore, it fails to demonstrate acceptable provision of tree planting and soft landscaping with consequent harm to visual amenity, the character and appearance of the area, biodiversity and environmental quality of the area. The proposals would be contrary to Policies CC7, EN12 and EN14 of the Reading Borough Local Plan 2019 and to the Tree Strategy 2021 and paragraphs 135, 136 and 187 of the NPPF 2024. It would not comply with the Sustainable Design and Construction SPD which states that 'development will not be permitted which would undermine current levels of tree cover as this is likely to be damaging to climate change adaptation strategies'.

Ecology

Policy EN12 (Biodiversity and The Green Network) requires that new development should provide a net gain for biodiversity where possible and should incorporate biodiversity features into proposals where practical. The site is also within a Green Link.

The application is subject to mandatory net gain requirements as outlined in Schedule 7A of the Town and Country Planning Act 1990.

An Ecology report has been submitted with the application. The Council's Ecologist considers this has been undertaken to the appropriate standard and agrees with the conclusions that the site is not suitable for bats, reptiles, great crested newts, badgers or other protected species. Vegetation clearance would have needed to be undertaken outside of the bird nesting season which would have been secured by way of condition.

A Biodiversity Net Gain assessment was conducted using the Statutory Biodiversity Metric, based on the proposed habitat plan in the ecology report which appears to align with the proposed landscaping plan. The assessment indicates that a net gain of +0.19 habitat units, equivalent to 70.67% gain, could be achieved. Should the application be recommended for approval, net gain would be contingent on meeting the pre-commencement general Biodiversity Net Gain conditions. This would secure the submission and approval of a Biodiversity Net Gain plan demonstrating how a 10% increase in biodiversity value would be achieved.

Given the nature of the scheme, and should the application be recommended for approval, ecological enhancements will also need to be provided, namely integrated bird (with a focus on swifts) and bat boxes and wildlife friendly landscaping. This could be secured by way of condition.

A condition could also secure provision of a wildlife friendly lighting scheme – particularly critical along the railway line vegetation which would need to remain dark and unlit.

Transport Issues

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

The site is located within Zone 3 Secondary Core Area, of the Council's adopted Parking Standards and Design SPD. Oxford is a main Transport corridor. Typically, these areas are within 400m of a Reading Buses high frequency 'Premier Route', which provides high quality bus routes to and from Reading town centre and other local centre facilities.

Parking

In accordance with the Council's Parking Standards and Design SPD, the development would require the following parking provision:

Size of Units	No of units	Required Provision Per Unit	Total
1 & 2 bed units	28	1.5	42
3 Bed Units	4	2	8
Visitor 1 space per 10 units			3

Total required		53
-----------------------	--	-----------

Based on the standards stated above the development would require 53 parking spaces. In addition to the provision of standard bays, 3 disabled spaces or 5% of total capacity (whichever is greater) should be provided. For this site this would equate to 2 disabled bays.

The scheme proposals a lower provision of 44 car parking spaces, 32 to be provided at basement level and 12 to be provided at surface level. The applicant has referenced car ownership data within the submitted Transport Statement to support the lower parking provision. For a lower provision to be considered, Transport Officers confirm that a comprehensive breakdown of the data the applicant has referred to with regards to Tilehurst North car ownership in the Transport statement would be required. This is to ensure that the data is comparable to the application site and allow for calculations and assumptions made to be verified. A detailed plan of the area would also be required.

Servicing

Transport Officers confirm that a facility would need to be provided for on site servicing for smaller vehicles.

The proposed layout fails to demonstrate that it complies with the Local Planning Authority's standards in respect of parking provision, on site servicing including the location of proposed disabled bays. This could result in on-street parking/reversing movements on Oxford Road, adversely affecting road safety and the flow of traffic, and in conflict with adversely affecting road safety and the flow of traffic, and in conflict with Policies TR1 and TR3 of the Reading Local Plan 2019 and the NPPF 2024.

Access

A new 6m wide dropped kerb is proposed leading to a ramped access to the car parking into the basement. Transport Officers confirm that the width of the access is acceptable as it would allow 2 way movement in and out of the site. However, the classified road guidance states the maximum gradient on new access roads shall be 10%, however the first 10 metres on approach to a classified road, the dwell area, shall be 4%. Transport Officers confirm that tracking plans would be required to identify how vehicles would manoeuvre up and down without coming into conflict with one another.

As a bell mouth junction is proposed all drawings would need to identify that the scheme would be provided with tactile paving on either side.

Given this is a classified road, visibility splays of 2.4m x 90m would be required.

The access located to the east of the site is outside of the red line and is not adopted public highway. Therefore, the applicant could only utilise this access if proof from the landowner allowing a right of access could be provided. At this stage this is not clear,

and it would be expected that the owner of land/access would need to be party to S106 agreement.

Visibility splays at the proposed access have not been provided. Inadequate visibility splays would be a hazard to road users, and in conflict with Policies TR1 and TR3 of the Reading Local Plan 2019 and then NPPF 2024.

Insufficient information has been provided to ensure the proposed main access would be sufficient in relation to the gradient and alignment to comply with local planning authority standards. This is in conflict with Policies TR1 and TR3 of the Reading Local Plan 2019 and the NPPF 2024.

Insufficient information has been provided to identify the location and design of the access to the eastern end of the development. This is in conflict with Policies TR1 and TR3 of the Reading Local Plan 2019 and the NPPF 2024.

Cycle Parking Provision

In accordance with the Council's standards each 1 and 2 unit would require 0.5 storage spaces each and 1 for each 3-bedroom unit. This would equate to a minimum of 18 storage spaces which should be secure and covered. The proposals include a cycle storage structure between Blocks 1 and 2, which the submission states would have capacity for 20 cycles. However, it is not clear on the type of storage and whether this would be sufficiently secure, nor whether the required dimensions would be achievable. From a security point, and as above, the storage should be located towards the rear of the site as opposed to the front of the site fronting Oxford Rd.

The proposed development would not comply with the Local Planning Authority's standards in respect of secure cycle storage provision. This is in conflict with Policies TR1, TR3 and TR5 of the Reading Local Plan 2019 and the NPPF 2024.

Details of electric vehicle charging points could have been dealt with via condition.

Bin areas are proposed across the frontage of Oxford Road, with space allocated for each flat to have their own individual bins. The Council's Waste Services Team state that where bins are provided individually households require more than one recycling bin and with upcoming reforms under 'Simpler Recycling' additional recycling space should be provided. As such, the bins setup is considered insufficient. It would usually be expected that communal bin storage facilities would be provided for flatted developments instead of individual bins. Waste Services would not be able to collect individual bins from their own locked bin stores, if they were provided in this way individual bins would need to be presented outside of the locked bin store on collection day and return to the store after. Provision of bin stores at the front of the site is problematic in design terms, as discussed elsewhere in this report. However, it is considered that bin provision in itself could have been dealt with by way of condition.

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

Sustainability

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

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

The applicant has submitted an energy and sustainability report with the application. In short, the scheme proposes welcomed measures such as efficient building fabric (e.g insulated floors, efficient glazing), air source heat pumps and PV roof panels.

The submitted report projects that the development would achieve a 73.79% improvement of carbon emission rate set out in building regulations that would comply with Policy H5 in this respect. Should the application be considered acceptable, then a S106 obligation would be required to secure a financial contribution to off-set carbon emissions to zero..

In terms of on-site decentralised energy provision, the submitted energy and sustainability report explores a range of options and proposes a solar photovoltaic system and air source heat pumps as a viable option to generate energy. Combined heat and power units and ground source heat pumps have been discounted due to inefficiencies and the constraints of the site.

SuDs

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

The proposal identifies a significant reduction to the surface water which is acceptable in principle. However, the LLFA has raised numerous concerns regarding the drainage design:

- The SuDs / FRA strategy states that the application site is located within an area that is at high vulnerability to groundwater the applicant has not assessed how the proposed basement car park would impact on the groundwater levels to ensure that the development would not result in flooding elsewhere and the resulting impact on the proposed surface water strategy.
- With the above in mind and that the SuDs / FRA strategy states 'full infiltration to groundwater is deemed unfeasible' permeable paving is proposed across most of the hard landscaped areas with the caveat that 'permeable pavement only suitable for very small storm events' the applicant would therefore need to clarify what would occur during the larger storm events in particular when the basement extent is taken into account.
- The proposed drainage system does not make use of the green infrastructure across the site in particular the new trees and as such the proposal fails to comply with Local Plan Policy EN18.
- Much of the permeable paving extents would appear to be located within private amenity areas and as such the applicant would be required to confirm how they would ensure that this permeable paving is retained and also maintained to the required standard for the lifetime of the development.
- The extent of the permeable paving extends to within the Public Highway and outside the redline boundary to the north these areas would need to be removed from the proposal and not included within any subsequent assessment of the drainage strategy.
- The proposal includes the provision of a drainage channel at the bottom of the car park ramp which would be 2.8m below ground level it would not appear that the pipe network would be that low and as such how would this drainage be transferred to the main on site connection.
- The management / maintenance plan should provide details as to how the green/sedum roof would be maintained to ensure that it is effective.
- The connection from the site to the Thames Water sewer currently proposed equates to a 180m long pipe in the Public Highway, the applicant would need to confirm that Thames Water are prepared to adopt this given that it accommodates drainage for more than one dwelling.

It is noted that whilst the SuDs document states that green/sedum roofs would be provided on all flat roofs, this does not appear to be illustrated on plans or included in documents elsewhere.

It is also clear from Policy EN18 that a landscape-led SuDs scheme should be incorporated within the proposals, supported by guidance in the Sustainable Design and Construction SPD. This is to maximise ecological benefits, link into the existing Green Network and provide the benefits of connecting tree planting with proposed SuDS drainage so that the trees and smaller plants can filter surface water within the site.

Whilst details of the SuDs proposal could be dealt with by way of condition, the principles must be agreed at application stage. Given the above, there are concerns relating to accuracy, integrated landscaping, services, site layout and foundation design.

The application fails to demonstrate acceptable principles as part of the application contrary to Policy EN18 of the Reading Borough Local Plan 2019 and paragraph 182 of the NPPF 2024.

Employment Skill and Training

In accordance with the Employment Skills and Training SPD and Policy CC9 (Securing Infrastructure) a development of this nature and scale is required to demonstrate how it would utilise local labour and contribute to skills and training for local labour in the form of a construction phase employment and skills plan associated with the development. Provision of such plan, or equivalent financial contribution, would be secured by way of S106 legal agreement should the application be recommended for approval. However, given the recommendation is to refuse planning permission for other reasons, completion of a S106 legal agreement is not being pursued and lack of such agreement securing construction phase employment and skills plan would represent a further reason for refusal of this application.

An informative will specify that this reason for refusal could be overcome, in the context of an acceptable scheme in all other respects, by entering into a S106 legal agreement.

CIL

The proposal would be a Community Infrastructure Levy (CIL) liable development. The applicant has provided the CIL Additional Information Form. However, this has not been completed. If the scheme had been acceptable an informative would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

Matters Raised in Representations

All material considerations have been addressed in the above assessment.

The Council has undertaken the necessary public consultation through the display of site notices at the site.

Overall Planning Balance and Conclusion

There are inaccuracies and lack of clarity within plan and report submissions which hampers the assessment of the application.

Paragraph 125 of the NPPF 2024 states the planning policies and decision should: “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”. The proposed development represents an opportunity to make a more efficient use of the site.

Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development (...). For decision taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed ; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing homes, individually or in combination.

The appropriate test in this instance is to consider whether the adverse benefits of granting planning permission would significantly and demonstrably outweigh the benefits.

It is acknowledged that there would be some planning benefits associated with the proposed development and it is recognised that the site is allocated within the Reading Borough Local Plan 2019 for housing.

The provision 30% Affordable Housing provision would be a benefit, along with the provision of housing in general. Biodiversity Net Gain on the site would also be a benefit.

However, with regard to paragraph 11)d)ii, the following must also be considered:

Making Effective Use of Land. The substantial harms identified outweigh the substantial weight that should be given to the value of using this brownfield site for homes. Paragraph 124 of the NPPF is clear that in making effective use of land this should be “while safeguarding and improving the environment and ensuring safe and healthy living conditions”. The current development fails to achieve this for the reasons set out above and as such there is a significant adverse impact in terms of effective use of this land.

The proposals would not meet the needs of the future occupiers because it would fail to provide acceptable living conditions or a suitable standard of amenity. The effects identified in respect of this specific proposal would harm both health and well-being, such that the benefits of housing in general become much reduced. The proposal is therefore not sustainable development.

Securing Well-Designed Places

For the reasons set out above, the proposal would not secure a well-designed place. Instead, it would have a harmful effect on the character and appearance of the area and is not considered to be an appropriate design response to the site context – nor the requirements of the site allocation policy.

Providing Affordable Homes

The provision of 30% Affordable Housing provision would be a benefit in general terms. However, the tenure, bedroom mix and location have not been agreed, and the benefits are further weakened by the inappropriate mix of dwelling sizes overall which does not meet housing need. This, together with the absence of a section 106 legal agreement to secure any such affordable housing means that the proposal does not make adequate provision, and this is a significant adverse impact.

Following on from the above, it is clear from the assessment of the proposals that there are a range of harms that would arise from this proposal relating to the scale, layout, mix, quality of accommodation, garden amenity, noise, contaminated land, trees/landscaping, parking and sustainable drainage. In overall terms, the proposal represents a substantially harmful form of development which can be summarised as an overdevelopment of the site.

Officers do not consider that the identified harm would be mitigated by a policy compliant percentage of affordable housing being secured, or by the net gain in biodiversity.

The benefits of the scheme are largely general in nature and would be capable of being provided within a better-designed scheme. It is therefore not essential that this proposal is approved in order to realise these benefits. Even when taking the benefits at face value, it is apparent that the substantial degree of harm identified across a range of matters would significantly and demonstrably out weight the benefits when considered against the Reading Borough Council Local Plan 2019 and the NPPF 2024 - having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The proposals are therefore recommended for refusal on this basis for the following reasons:

1. The proposed development, due to the excessive scale and bulky form of buildings and associated development together with their site coverage, would represent a cramped, unattractive and visually stark overdevelopment of the site which fails to accommodate buildings (including outbuildings), parking areas, access ramps and steps, bin stores, tree planting and other soft landscaping in a manner that enhances

the character and appearance of the area. This harmful arrangement together with the visual prominence of the site would result in harm to the street scene and character of the area. Contrary to Policies CC7 (Design and the Public Realm) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Local Plan 2019 and paragraphs 96, 129, 131, 135 and 136 of the NPPF 2024.

2. The proposed development would provide insufficient dwellings of 3 bedrooms or more and as such would fail to adequately contribute towards meeting the identified housing needs of Reading Borough. Contrary to Policy H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 61 and 129 of the NPPF 2024.
3. The proposed development, due to its single-aspect room layout, combined with enclosure from trees and acoustic fencing, would result in a poor quality of accommodation in terms of outlook, daylight and sunlight. This would result in a detrimental impact on the living environment of future occupiers. Contrary to Policies CC8 (Safeguarding Amenity) and H5 (Standards for New Housing) of the Reading Borough Council Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024.
4. The proposed development due to its design, layout and proximity to Oxford Road and the railway line has failed to demonstrate that a suitable quality of accommodation would be provided for future occupiers in respect of noise and disturbance, with consequent harm to the amenity of future occupiers. Contrary to Policies CC8 (Safeguarding Amenity) and EN16 (Pollution and Water Resources) of the Reading Borough Local Plan 2019 and paragraphs 96, 135, 187 and 198 of the NPPF 2024.

5. The proposed development, due to the cramped size of the gardens combined with the noise environment, overshadowing from trees, and the overbearing nature of the acoustic fencing, the main building and other enclosures, would fail to provide an adequate quality of outdoor garden space for future occupiers, harmful to their amenity. Contrary to Policies CC7 (Design and the Public Realm), EN9 (Provision of Open Space), Policy H10 (Private and Communal Outdoor Space) of the Reading Borough Council Local Plan 2019 and paragraphs 96 and 135 of the NPPF 2024.
6. The proposed development fails to demonstrate that trees of amenity value would be protected from harm from the development with consequent harm to the visual amenity, character, biodiversity and environmental quality of the area. Contrary to Policies CC7 (Design and the Public Realm), EN12 (Biodiversity and the Green Network), and EN14 (Trees, Hedges and Woodland) of the Reading Borough Local Plan 2019 and the Reading Borough Council Tree Strategy 2021 and paragraphs 135, 136 and 187 of the NPPF 2024.
7. The proposed development fails to demonstrate that works required for the decontamination of the land would be acceptable in terms of the impact on protected trees, drainage, and the stability of the railway embankment. Contrary to Policy EN16 (Pollution of Water Resources) of the Reading Borough Local Plan 2019 and paragraphs 135, 187 and 198 NPPF 2024
8. The proposed layout fails to make adequate provision for the parking and manoeuvring of vehicles within the site resulting in an increased risk of on-street parking and/or vehicle manoeuvring with consequent harm to road safety and the flow of traffic. Contrary to Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway Related Matters) of the Reading Local Plan 2019 and paragraphs 109, 115 and 117 of the NPPF 2024.
9. The proposed development fails to demonstrate that adequate visibility splays would be provided for vehicles at the site entrance resulting in a hazard to road users. Contrary to Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway Related Matters) of the Reading Borough Local Plan 2019 and paragraphs 109, 115 and 117 of the NPPF 2024.
10. The proposed development fails to demonstrate acceptable, well designed and integrated secure cycle storage provision. Contrary to Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway Related Matters) and TR5 of the Reading Borough Local Plan 2019 and paragraphs 109, 115 and 117 of the NPPF 2024.

11. The proposed development fails to demonstrate that the vehicle access ramp would be acceptable in terms of its gradient and provision for the manoeuvring of vehicles, with consequent harm to highway safety. Contrary to Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway Related Matters) of the Reading Borough Local Plan 2019 and paragraphs 109, 115 and 117 of the NPPF 2024.
12. The proposed development, in the absence of an acceptable landscaping-led Sustainable Drainage Strategy, fails to provide for sustainable drainage, with consequent harm in respect of attenuating localised flooding, achieving ecological benefits, securing linkages to the existing Green Network and integration with tree planting and landscaping. Contrary to Policy EN18 (Flooding and Sustainable Drainage Systems) of the Reading Borough Local Plan (2019) and the Sustainable Design and Construction SPD (2019) and paragraph 182 of the NPPF 2024.
13. In the absence of a completed legal agreement to secure the provision of an acceptable amount, mix and tenure of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough and the need to provide sustainable mixed and balanced communities. The proposal is therefore contrary to Policies H3 (Affordable Housing) and CC9 (Securing Infrastructure) of the

Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021 and paragraph 64 of the NPPF 2024.

14. In the absence of a completed legal agreement to secure an appropriate financial contribution towards carbon off-setting in the Reading Borough, the proposal would not acceptably adapt to climate change, achieve zero carbon homes standards and not provide appropriately towards energy infrastructure. Contrary to Policies CC3 (Adaptation to Climate Change), CC9 (Securing Infrastructure) and H5 (Standards for New Housing) of the Reading Borough Local Plan (2019) and the Sustainable Design and Construction SPD (2019) and Planning Obligations under S106 SPD (2015).
15. In the absence of a completed legal agreement to secure an acceptable Employment and Skills Plan (construction phase only; employment and skills plan, or financial contribution), the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm. Contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan (2019) and the Employment Skills and Training SPD (2013) and Planning Obligations under Section 106 (2015).
16. In the absence of a completed legal agreement to secure the means of access to the site from the public highway at the eastern end of the site the proposal fails to make appropriate provision for access to the site. Contrary to Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway Related Matters) of the Reading Borough Local Plan 2019 and paragraphs 109, 115 and 117 of the NPPF 2024.

1. This decision relates to the following plans and documents:

Air Quality Assessment prepared by Redmore environmental Ref: 8470r1 dated 18 October 2024

Arboricultural Impact Assessment prepared by PCA Landscape Ref: P.2103.24 dated October 2024

Character Study prepared by sawkings architects dated October 2024

Design and Access Statement prepared by sawkings architects dated October 2024

Ecological Impact Assessment and Biodiversity Net Gain prepared by windrush ecology date September 2024

Geo-Environmental Assessment prepared by WDE consulting Ref: 21283R1 (Issue A) dated May 2024

Flood Risk Assessment and SuDs report document number C3411-R1-Rev B dated November 2024

Noise Impact Assessment prepared by accon uk dated 08.11.2024

Planning Statement prepared by Nova Planning dated 24 October 2024

Sustainability and Energy Statement prepared by bluesky dated 21 October 2024

Transport Statement prepared by i-Transport Ref: ITB200269-001B TS dated 23 October 2024

OS Map and Location DWG 0001 Rev P1

Existing Site Plan DWG 1000 Rev P1

Topographical Survey 21202/P/01 dated 12/12/23

Topographical Survey 21202/P/02 dated 12/12/23

Proposed OS Map and Location DWG 0002 Rev P1

Proposed Site Plan Ground Floor Plan DWN 3001 Rev P1

Proposed Site Layout Roof Plan DWG 3000 Rev P1

Proposed Basement Level Blocks 1 and 2 DWG 3100 Rev P1

Proposed Ground Floor Plan Blocks 1 and 2 DWG 3101 Rev P1

Proposed First Floor Plan Blocks 1 and 2 DWG 3102 Rev P1

Proposed Second Floor Plan Blocks 1 and 2 DWG 3103 P1

Proposed Roof Plan Blocks 1 and 2 DWG 3104 Rev P1

Proposed Elevations (North and East) Blocks 1 and 2 DWG 3201 Rev P1

Proposed Elevations (South and West) Blocks 1 and 2 DWG 3200 Rev P1

Proposed Ground Floor Plan Block 3 DWG 3105 Rev P1

Proposed First Floor Plan Block 3 DWG 3106 Rev P1

Proposed Second Floor Plan Block 3 DWG 3107 Rev P1

Proposed Roof Plan Block 3 DWG 3108 P1

Proposed Elevations (South and West) Block 3 DWG 3202 P1

Proposed Elevations (North and East) Block 3 DWG 3203 Rev P1

Proposed Ground Floor Plan Block 4 DWG 3109 P1

Proposed First Floor Plan Block 4 DWG 3110 Rev P1

Proposed Second Floor Plan Block 4 DWG 3111 Rev P1

Proposed Roof Plan Block 4 DWG 3112 Rev P1

Proposed Elevations (East and South) Block 4 DWG 3204 P1

Proposed Elevations (North and West) Block 4 DWG 3205 Rev P1

Proposed GA Sections Block 1 DWG 3301 Rev P1

Proposed GA Sections Block 2 DWG 3302 Rev P1

Proposed GA Sections Block 3 DWG 3303 Rev P1

Proposed GA Sections Block 4 DWG 3304 Rev P1

Proposed Landscape Layout P 210324LD1

Proposed Bin Storage DWG 3400 Rev P1

Proposed Cycle Storage DWG 3401 Rev P1

Proposed Site street Elevation – Oxford Road DWG 3206 Rev P1

Proposed Site Street Elevation – Oxford Road DWG 3207 Rev P1

2. The local planning authority has worked with the applicant in a positive and proactive by advising of the concerns with proposal and providing for the opportunity for the application to be withdrawn. The applicant chose not to withdraw the application, hence the issuing this refusal notice.

3. Without prejudice to any future application or appeal, the applicant is advised that reasons for refusal 13, 14, 15 and 16 be overcome with the completion of a satisfactory s106 legal agreement for a scheme that was in all other respects acceptable.
4. The applicant is advised that the refused scheme, had it been able to be approved, would have been a CIL (Community Infrastructure Levy) liable development.