

## Planning Statement

Land North of 75 Star Road,  
Reading

*Prepared For*  
**Virya Notting Hill Limited**

**4607**  
**July 2025**



**bell cornwell**

CHARTERED TOWN PLANNERS

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## 1 INTRODUCTION

1.1 This statement has been prepared on behalf of **Virya Notting Hill Limited** in support of a Full Planning application for the erection of a terrace of 4no. dwellings with associated access, car parking and landscaping. This statement should be read in conjunction with the other supporting documents and drawing package:

- Drawing package
- Flood Risk Assessment and Sectional & Exception Report
- Biodiversity Net Gain Plan
- Energy Statement
- Transport Statement
- Air Quality Assessment

1.2 The material planning considerations in favour of the proposal include the following:

- The site is situated in a sustainable location where the principle of residential development is acceptable.
- Whilst acknowledging the site is within Flood Zone 3a, it is not located in a functional flood plain, and the proposal will make efficient use of a brownfield site.
- The extent and quantum of development envisaged is acceptable, with the proposal making effective use of the site whilst respecting the character and setting of the site's location.
- Occupying a sustainable location with access to significant number of facilities and services and thus help sustain an inclusive mixed community.
- There is an accepted need for more housing in the Borough



- The proposal would make a useful and proportionate contribution to local housing requirements and would be in accordance with the Council's Spatial Strategy.
- The site would be developed with a high-quality scheme, providing 4no. family homes in keeping with the surroundings.
- The proposal will safeguard the amenity and privacy of nearby residential occupiers, with satisfactory separation distances and relationships being achieved.
- The supporting technical reports demonstrate the development can be delivered without adverse impact to nearby residential occupants or local environment.

1.3 This statement will highlight why it is considered the proposal complies with the relevant policies within the Local Development Plan for the area in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the NPPF 2024.

1.4 In our view, the proposal has significant merit. Further, the Council, in seeking to achieve its new housing targets within the government's Standard Method, should support this scheme as a 'windfall' site, which fully respects the character, appearance and setting of the locality.

### **THE SITE**

1.5 The application site is located within the settlement of Caversham, on the North side of Reading in Berkshire. Star Road is a residential area, comprising of a range of dwelling types, including Victorian terraces, modern detached houses and semi-detached properties.

1.6 The application site is a vacant parcel of land to the north of number 75 Star Road and to the south of the Co-Op. To the west are two storey properties located in Briants Avenue. To the east are two storey properties rising to 3 storey at the roundabout junction of Star Road and Lower Henley Road.



- 1.7 The site is located within Flood Zone 3a. The site is outside of a conservation area with the nearest statutory listed building (82 Star Road) located to the southeast of the site.

### **PLANNING HISTORY**

- 1.8 The Council's planning register has been reviewed, and the following are noted of relevance.
- 1.9 **PL/07/0313** Outline application for the erection of 4 dwellings (2 X 2-bed semi-detached). Refused 4 October 2007 on the grounds of failure to provide acceptable sequential test and FRA, together with the failure to secure required contributions and inappropriate design.
- 1.10 This application is considerably different to the refused scheme and is subject to a materially different planning policy position. The application is supported by a policy compliant Flood Risk Assessment together with a Sequential and Exceptions Test. Moreover, the design of the proposals, for a terrace of 4no. dwellings is comparable with the groups of terraces along Star Road and also Briants Avenue.
- 1.11 Another application of note in the area, is **PL/18/0353** at 82 Star Road for the erection of a single detached dwelling and restoration of the existing Listed Cottage, including the construction of a replacement extension. This is an important case of reference, as this site is located only some 30m to the southeast where the Council allowed a new dwelling within Flood Zone 3a.



## 2 THE PROPOSAL

- 2.1 The applicant seeks planning permission for: **“The erection of a terrace of 4no. 3-bedroom dwellings, parking together with hard and soft landscaping”**.
- 2.2 The proposed dwellings will comprise of three storey terraced houses, designed in a modern but sympathetic architectural style, which is reflective of the existing variety of properties found within the street. Due to the constraints of the site, it has been set back within the plot, which allows for on curtilage car parking, refuse and secure cycle storage, but also enables the property to be set above predicted flood levels.
- 2.3 The ground floor extends deeper into the site to provide greater communal living and dining spaces for each dwelling. The slightly recessed upper floors ensure separation distance to the properties to the rear, within Briants Avenue, are maintained.
- 2.4 Private rear gardens are proposed for each dwelling ranging between 39.5sqm and 100sqm.



### 3 PLANNING POLICY

- 3.1 Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 In the case of this application, the relevant Development Plan consists of the Reading Borough Local Plan adopted in November 2019.
- 3.3 The National Planning Policy Framework (NPPF) and its accompanying practice guidance together with non-statutory supplementary planning documents are also key material considerations. Although not development plan policy, it represents important guidance which sets out the Government's approach towards planning for new development.

#### NATIONAL PLANNING POLICY FRAMEWORK 2024

- 3.4 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10) which should be seen as a foundation for both plan-making and decision-taking (paragraph 11). This states that proposals that accord with up-to-date development plan policies should be approved "without delay". Where the development plan is either silent or out-of-date, planning permission should only be refused where the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development, or the adverse impact would significantly and demonstrably outweigh the benefits.
- 3.5 Footnote 8 to Paragraph 11(d) advises that out of date means, *"This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years..."*



- 3.6 The Council's Local Plan was adopted more than 5 years ago and whilst the Council's Annual Monitoring Report (AMR) (December 2024) indicates a 6.1 year supply, this does not take into account the government's new Standard Method which has been increased to an annualised requirement of 1,028 new homes compared to the annualised requirement of 689 new homes within the current Local Plan. The NPPF also requires a 5% buffer which takes the annualised requirement for the borough to 1,079 new homes. The Council in their 2024 AMR state that their 5 year supply of homes is 4,311. On this basis, taking into account the uplift in housing requirement, that the Council's housing land supply position is closer to 3.9 years.
- 3.7 Notwithstanding the housing land supply position, the NPPF at paragraph 125 places substantial weight on the value of using brownfield land within settlements for new homes. This substantial weight must therefore place the benefits of this application in favour of granting development.

#### **STRATEGIC PLANNING POLICY – READING BOROUGH LOCAL PLAN 2019**

- 3.8 The following policies are considered to be relevant however, in light of the age of the Local Plan, consideration must be given to the weight which can be attributed to these policies, having regard to the compliance with the NPPF.
- CC1: Presumption in Favour of Sustainable Development
  - CC3: Adaptation to Climate Change
  - CC6: Accessibility and the Intensity of Development
  - CC7: Design and the Public Realm
  - CC8: Safeguarding Amenity
  - EN12: Biodiversity and the Green Network
  - EN15: Air Quality
  - EN18 Flooding and Sustainable Drainage Systems
  - H1: Provision of Housing
  - H2: Density and Mix
  - H3: Affordable Housing
  - H5: Standards for New Housing



- H10: Private and Communal Outdoor Space
- TR3: Access, Traffic and Highway-Related Matters
- TR5: Car and Cycle Parking and Electric Vehicle Charging

3.9 Whilst the housing policies have been identified in the list above, in light of the age of the Local Plan and what we assert to be the housing land supply position, we consider that these housing policies can no longer be relied upon or considered compliant with the NPPF.

#### **SUPPLEMENTARY PLANNING DOCUMENTS**

3.10 The Council has published a number of non-statutory guidance documents however, similar to comments made earlier, these SPDs must be read in the context of their age and conformity with the NPPF.

- Affordable Housing SPD 2021
- Revised Parking Standards and Design SPD 2011
- Planning Obligations SPD 2015
- Sustainable Design and Construction SPD 2019



## 4 PLANNING ASSESSMENT

4.1 The following are relevant in the consideration of the proposed development

- Principle
- Housing Mix
- Affordable Housing
- Design and Appearance
- Flood Risk and Drainage Strategy
- Highways and Parking
- Sustainable Construction
- Ecology, Biodiversity and Trees
- Air Quality
- Residential Amenity

### PRINCIPLE AND HOUSING MIX

4.2 The NPPF (paragraph 124) states that LPAs should “... *promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. This rhetoric is furthered under paragraph 125(c) which identifies that substantial weight which should be given to using suitable brownfield land within settlements for homes.

4.3 The site would therefore be considered a ‘windfall’ site as defined by the NPPF. Paragraph 73 of the NPPF states that “*small and medium sized sites can make an important contribution to meeting the housing requirements of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly*”. Local Planning Authorities are encouraged at 73(d) to “*support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*”.



- 4.4 On this basis, great weight should be afforded to the benefits of provision of 4no. new family homes within this established and well serviced area of the borough. Each of the homes will provide 3-bedroom and which will all meet Nationally Described Space Standards. The density of development is characteristic of the area in which it is located.
- 4.5 The development therefore accords with policies CC1, H1 and H2 and will make a meaningful contribution to the supply of new homes in the borough.

### **AFFORDABLE HOUSING**

- 4.6 Policy H3 of the Local Plan sets out the Council's aspirations for the delivery of affordable housing across the borough, confirming that on all developments of between 1-4 dwellings a financial contribution will be made equivalent to 10% of the housing to be provided as affordable housing elsewhere in the borough. This is expanded upon within the Affordable Housing SPD 2021 noting that where a contribution is required by policy H3, this will equate to 5% of GDV of the development.
- 4.7 The applicant can confirm that they are amenable to this approach and providing details of development GDV.

### **DESIGN AND APPEARANCE**

- 4.8 The proposed dwellings will comprise of three storey terraced houses. The ground floor extends deeper into the site to provide enhanced family living accommodation. At first floor are two bedrooms (one with ensuite) and a family bathroom. The second floor is within the roof and benefits from dormer window. This will provide the third bedroom with ensuite and storage. The dwellings have been designed in a modern but sympathetic architectural style, which is reflective of the existing variety of properties found within the street.
- 4.9 As will be explored in the following section, the finished floor levels are required to be raised due to the most recent Environment Agency data. This in turn has resulted in an increase in ridge height. However, the application is supported by comparison drawings illustrating that the difference between the dwellings to the rear in Briants Avenue. The proposed height is not discordant in terms of the character of the area, as there are



examples of increased ridge height to the north, at the junction of Star Road and Lower Henley Road, where there is a full three storey block of flats.

- 4.10 In terms of amenity space, each property will benefit from private amenity areas commensurate with the area and which satisfy the Council's minimum standards. The amenity areas vary from 39.5sqm to 100sqm.

### **FLOODING**

- 4.11 It has been identified from the accompanying Flood Risk Assessment (FRA) that the site lies within Flood Zone 3a, where there is a high probability of flooding. Due to the positioning of the site in Flood Zone 3a, the NPPF requires a sequential and exception test to be applied to the proposed dwelling, specifically the 2024 updated NPPF states at paragraphs 173- 175:

*173. A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.*

*174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.*

*175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).*

- 4.12 The accompanying Sequential & Exceptions Test Report sets out at section 9 the search area of for sites which are of comparable size where there are opportunities to development. This search has taken into account the guidance within the Planning



Practice Guidance. This search has concluded that of those sites assessed none of them are 'reasonably available'. On this basis, it is necessary to advance to the exceptions test. As set out in the accompanying FRA, it recommends that the finished floor level of the new dwellings is set 300mm above the predicted flood level to 38m AOD. This increase in finished floor level is clearly evident in the supporting drawing package. These flood resilience adjustments ensure that occupants of the new homes will not be at risk of flooding now or in the future taking into account climate change.

4.13 The development accords with the NPPF and policy EN18 of the Local Plan.

### **HIGHWAYS AND PARKING**

- 4.14 The NPPF states that transport policies have an important role to play in facilitating sustainable development, with an overall objective of promoting sustainable travel choices. However, it also states at paragraph 116 that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network arising from the development are severe.
- 4.15 The site is within walking distance of Reading Town Centre and has easy access to public transport links, including Reading Train Station (1.3km). The nearest bus stops are on Briants Avenue (southbound) and Donkin Hill (northbound), both just under 120m walk from the site. The southbound stop on Briants Avenue has a canopy half-shelter, a buildout and marked bus cage on the road, plus a widened pavement at this point. The northbound stop on Donkin Hill also has a small pavement widening and bus information on the bus stop pole, but no shelter. It is located between parking bays but the build out means access to the bus is unimpeded.
- 4.16 As already stated, the site is well located in terms of access to public transport choices, jobs and services, where there is less need for a car. Notwithstanding, the proposed development has sought to meet the Council's suggested residential parking standards with the provision of 4 car parking spaces provided on curtilage (i.e. 1 space per dwelling). For locations within zone 2, as set out the Revised Parking Standards and



Design SPD, 3-bedroom houses are required to provide 2 spaces, meaning an overall requirement of 8 for the proposed development.

- 4.17 Whilst the proposed development does not meet this requirement. Lambeth style beat survey has been undertaken concluding that Star Road has 44 possible parking spaces, with 26 used for the weekend night and 31 on the weekend night, giving 13 to 18 spare parking spaces available in that stretch of road alone. As such, whilst the development may not meet the non-statutory guidance, it has been demonstrated that there is sufficient capacity on road to accommodate additional car parking. Further, the on curtilage car parking can be provided with Electric Vehicle charging points.
- 4.18 The application also includes the provision for safe and secure cycle parking, which is located internally within Plot 1 and 4, whilst secure storage is provided externally within the front gardens of Plots 2 and 3.
- 4.19 Overall, the proposed development accords with Local Plan policy TR3 and TR5 together with section 9 of the NPPF.

### **SUSTAINABLE CONSTRUCTION**

- 4.20 The Council's 2019 Sustainable Design and Construction SPD requires that "New build housing on sites less than 10 dwellings will achieve at a minimum a 19% improvement in regulated emissions over the target emission rate, as defined in the 2013 Building Regulations unless it can be clearly demonstrated that this would render a development unviable.
- 4.21 RBC has chosen to include the optional water efficiency standard in policy H5. For clarity, the higher water efficiency standard set out in the Building Regulations is 110 litres per person per day.

### **AIR QUALITY**

- 4.22 Policy EN15 of the Local Plan advises that development should have regard to the need to improve air quality and reduce the effects of poor air quality when assessed against a number of criteria.



- 4.23 As the development is not predicted to produce any significant additional traffic movements it is highly unlikely that the development will have an impact on local traffic flows and air quality, as there are only four parking spaces associated with the proposed development, therefore it will not create an increase in traffic of more than 100 AADT, which is the level below which detailed air quality assessments are not usually considered necessary. The impacts of the development on air quality is set out in the accompanying technical report. The development satisfies the requirements of policy EN15 of the Local Plan.

### **ECOLOGY, BIODIVERSITY AND TREES**

- 4.24 Policy EN12 of the Local Plan requires that on all sites, development should not result in a net loss of biodiversity and geodiversity. Since the adoption of the Local Plan, the government has introduced a mandatory requirement for 10% net gain on all new developments.
- 4.25 The supporting Biodiversity Net Gain illustrates that due to the existing base line condition of the site, there will be a net loss of biodiversity on the application site. In order therefore to achieve the mandatory 10% net gain it will be necessary to rely on off-site enhancements equivalent to a total of 0.09 habitat units. This can be secured via an appropriately worded planning condition.

### **RESIDENTIAL AMENITY**

- 4.26 As set out earlier, the proposed new dwellings will meet the Nationally Described Space Standards and will additionally meet the council's external space standards for amenity space. Each property will benefit from parking, together with bin and bike stores. In this respect, the amenity standards for new occupants will be satisfactory.
- 4.27 In terms of residential amenity of occupants of existing properties in the area, the proposed development will maintain circa 20.5m back-to-back distance between the first floor of the proposed dwellings and the nearest dwellings in Briants Avenue, which is recognised to be a distance appropriate to maintain privacy. Whilst the proposed development will result in a change to the outlook from these properties to the rear,



there is no protection through the planning system to a view. The change in outlook must therefore be weighed against the benefit of make the most effective use of a brownfield site in a highly sustainable location.

### **S106 AND CIL**

- 4.28 The Council adopted Community Infrastructure Levy (CIL) and which is liable on development, amongst others, where new residential development is proposed. The charge is also subject to indexation which is reviewed annually. This application is supported by CIL Form 1 (additional information).
- 4.29 In terms of Section 106, the development as noted earlier will require a financial contribution toward affordable housing and which therefore will need to be secured by agreement.

### **CONCLUSION**

- 4.30 The principle of the erection of four dwellings within a highly sustainable location is allowed for within the development plan and acceptable in principle. There is, in light of the directive from government, an increased need to deliver more homes in sustainable locations, and this application will assist with the delivery of these needed homes. Paragraph 125 of the NPPF places substantial weight on the value of using brownfield land within settlements for new homes. This substantial weight must therefore place the benefits of this application in favour of granting development.
- 4.31 The siting of the dwellings accords with the established pattern of development within the area and maintains the rhythm of development. The design of the proposed dwellings equally are of a traditional aesthetic and whilst the overall height of the dwellings are marginally taller than those directly adjacent (due to flood prevention requirements) they nonetheless are comparable with the surrounding environment and are consistent with the gradual increase in building form to the north, at the roundabout junction. The proposed design and materials for the dwellings would clearly not have any significant impact to the street scene and character of the area.



4.32 Through the submission of the accompanying technical reports, it has been demonstrated that the proposed development satisfies the policies within the Loca Plan and the more up to date objectives within the NPPF. Any mitigation required, as identified, can be secured through the use of appropriately worded planning conditions and Section 106 legal agreement.