

DELEGATED APPLICATION REPORT

Ward: Soutcote Ward

App Ref: PL/25/1447 Outline planning permission: Some matters reserved

Address: 19 PARKSIDE ROAD, READING, RG30 2BT

Proposal: The erection of four residential dwellings (phased) with associated hard and soft landscaping and parking with the construction of a new access from Parkside Road and Kearsley Road following demolition of outbuildings (outline application considering access all other matters reserved (appearance, landscaping, layout, scale))”

Applicant: Mr R Stimpson

Received date: 09/10/2025

Target Decision date: 15/12/2025

Case Officer: Catrin Davies

1. SITE DESCRIPTION

The application site relates to the rear garden land of 19 Parkside Road, which is a locally listed building known as ‘High Hesket’ designed by a local architect, constructed in the 1930s with Arts & Crafts inspirations and used during civil defence in the Second World War.

The site has access of Parkside Road and Kearsley Road and contains several outbuildings. The site is heavily restricted with trees which are heavily concentrated on the western section of the site.



Existing Block Plan

2. PROPOSAL AND SUPPORTING INFORMATION

The proposal seeks outline planning permission for 4 dwellings:

'Appearance', 'Landscaping', 'Layout' and 'Scale' are reserved for future consideration applicant has submitted a set of indicative drawings showing how the proposed 4 dwellings might be accommodated within the site.

Access is proposed for consideration at Outline stage (the current application) and is shown as a continuation from Parkside Road to the south of the existing house and off Kearsley Road. The drawings indicate two dwellings plots 4 and 3 off Kearsley Road and plots 1 and 2 off Parkside Road.

Plans/documents:

Received 9/10/26

- Topographical Survey, drawing no. Geo23-127_T (Geopoint.)
- Site Location Plan, drawing no. 22.19-010A (Spires Architects)
- Existing Building Plans, drawing nos. 22.19-025 – 029 (Spires Architects)
- Proposed Illustrative Development Layout, drawing no. 22.19-021C (Spires Architects)
- Design & Access Statement (Spires Architects)
- Ecology Survey and BNG Assessment (Turnstone Ecologists)
- Heritage Statement (TCMS Heritage)
- Highways Statement and Access Drawings (Bellamy Roberts)
- Sustainability & Energy Statement (Bluesky Unlimited)
- Tree Survey & Report (Duckworths Arboriculture Ltd.)
- This Planning Statement (Woolf Bond Planning)

Received 5/2/26 (amended/additional information)

- BS:5837 ARBORICULTURAL REPORT; ARBORICULTURAL IMPACT ASSESSMENT & PRELIMINARY ARBORICULTURAL METHOD STATEMENT FEBRUARY 2026 Ref: 06831 / 2026 0.2
- Tree Removal Plan 06831 2025 0.2
- TPP (Preliminary) 06831 2026
- Wbp covering letter of 5th February 2026
- Drainage Technical Note Issue 05 dated 27/01/2026, incorporating Proposed Drainage Strategy drawing 7188/402 C
- Illustrative Development Layout Col – 22.19-021 Rev D.
- Phasing Plan – 22.19-030 Rev A. Updated to include proposed virtual footway.
- Transport Statement Addendum – 30th Jan 2026, prepared by Bellamy Roberts.
- Drainage Statement Technical Note – updated 27th January 2026

Planning History

PL/20/0616-Proposed Replacement Access Gates and Adjacent Boundary Treatment to Rear Garden Entrance (Off Kearsley Road), to no 19 Parkside Road, Reading RG30 2BT. Granted

PL/21/0546-Proposed Non-Material Amendment to the wording of conditions 3 (Plans) and 4 (Arboricultural Report) of planning permission 200616. Granted.

3. CONSULTATIONS

Transport Development Control

The application proposes to retain the existing house and to construct 4 dwellings in the garden area of No19.

In accordance with the adopted Parking Standards and Design SPD each dwelling would require 2 off road parking spaces. In addition to this existing parking provision would need to be retained for No19. Each parking space should be 2.5m wide by 5m long and have forecourt depths of 6m to ensure that spaces can be manoeuvred in and out of easily. Any garages or car ports would need to conform to the Councils adopted standards.

The proposed development will be accessed from both Parkside Road and Kearsley Road. Plots 1 and 2 will be accessed from Parkside Road, and plots 3 and 4 will be accessed from Kearsley Road.

Original Dwelling (No19)

Accessed from Parkside Rd. It is proposed that the existing dwelling be retained and served by the existing northern access; There is sufficient space for vehicles to be parked on the drive. This is deemed acceptable.

Plots 1 to 2

These plots will be serviced via a widened access from Parkside Rd. Visibility splays have been provided illustrating achievable site lines which are deemed acceptable given the 20mph restriction in place.

A license to widen to access will be required from the Highways team.

Proposed Layout



Visibility Splays



As previously advised the access will need to be 4.8m wide to accommodate refuse vehicles and cars entering and exiting the site, this has been illustrated on plans. A 1.2 m pedestrian route will also be required. It should be noted that Manual for **Streets Section 7 states:**

Shared surfaces can cause problems for some disabled people. People with cognitive difficulties may find the environment difficult to interpret. In addition, the absence of a conventional kerb poses problems for blind or partially-sighted people, who often rely on this feature to find their way around. It is therefore important that shared surface schemes include an alternative means for visually-impaired people to navigate by.

Plots 3 & 4

Plans indicate dwellings to be provided with 2 parking spaces each (one in garage) accessed via an existing vehicle crossing from Kearsley Road.



A 4.2m wide access road is proposed and is deemed acceptable. An on site turning area has been provided, however a 1.2m pedestrian footway leading into the site will be required as stated for the reasons for plots 1 and 2 above.

The Natural environment officer will need to be consulted to ascertain any impact on adjacent trees.

All parking spaces and forecourt depths must be provided in accordance with the Councils standards, this includes the required internal dimensions for garages.

All parking areas should be constructed in permeable materials so not to increase the surface water run-off from the site.

Electric Vehicle Charging

The Council's Local Transport Plan 3 Strategy 2011 – 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. The Councils Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point.

Refuse Collection

It is noted that refuse vehicles will enter into the site but the refuse vehicles must be able to get within 15m of a bin collection point to avoid the stationing of service vehicles on the carriageway for excessive periods and should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods.

Cycle Storage

In accordance with the adopted Parking SPD, each new dwelling will require a minimum of 2 cycle parking spaces for each C3 dwelling. In a development of this nature these can be provided in the private rear gardens of each dwelling.

Additional information/Amended plans were received and reviewed by the consultant and the follow comments were made:

Version II

The application proposes to retain the existing dwelling and construct four additional dwellings within the garden area of No. 19.

In accordance with the adopted Parking Standards and Design SPD each dwelling would require 2 off road parking spaces. In addition to this existing parking provision would need to be retained for No19. Each parking space should be 2.5m wide by 5m long and have forecourt depths of 6m to ensure that spaces can be manoeuvred in and out of easily. Any garages or car ports would need to conform to the Councils adopted standards.

The proposed development will be accessed from both Parkside Road and Kearsley Road. Plots 1 and 2 will be accessed from Parkside Road, and plots 3 and 4 will be accessed from Kearsley Road.

Original Dwelling (No19)

The existing dwelling will continue to be accessed from Parkside Road via the northern access. Adequate space is available within the driveway for vehicles to park off-street. This arrangement is considered acceptable.

Plots 1 to 2

These plots will be serviced via a widened access from Parkside Rd. Visibility splays have been previously provided illustrating achievable site lines which are deemed acceptable given the 20mph restriction in place.

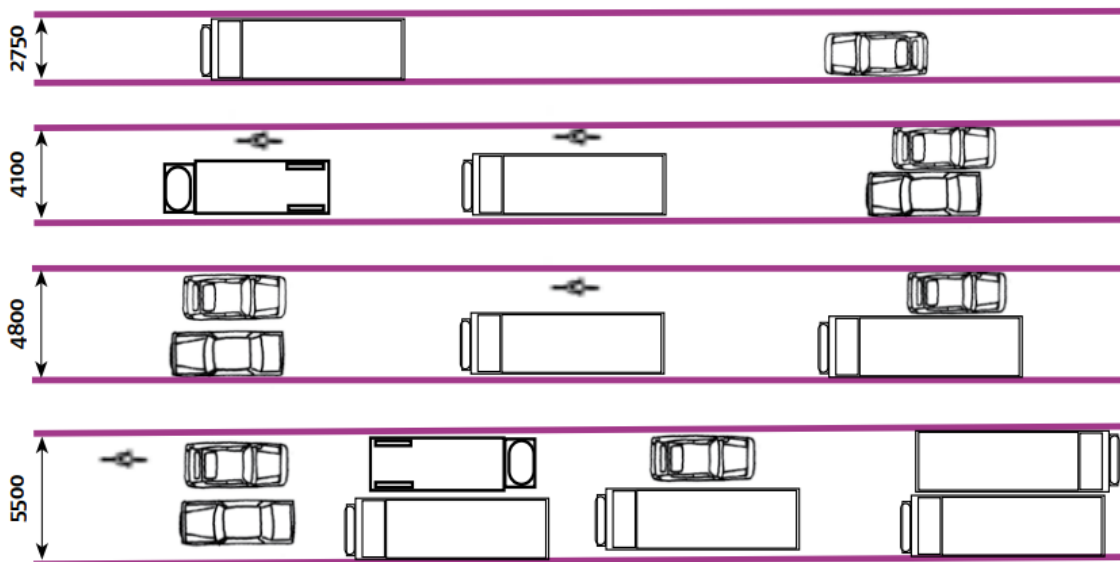


As previously advised the access will need to be 4.8m wide to accommodate vehicles entering and exiting the site. Submitted illustrative layout plan 22.19-021 (extract below) indicates a width of 4.8m; however, this measurement includes the 1.2m pedestrian footway, which is not acceptable.



While a carriageway width of 4.2m may be acceptable over short distances, this does not include the required 1.2m pedestrian footway. Consequently, the carriageway would still need to be widened to 4.8m, which is not currently shown on the submitted plans.

The 4.8m width is required to accommodate the width necessary to allow for a refuse vehicle and a car to pass one another as illustrated from the extract below from Mfs 7.1



To clarify, the 1.2m pedestrian footway must be provided in addition to the required carriageway width along the entire access from Parkside Road. As previously advised, the pedestrian footway should extend to serve all properties within the development and should therefore be clearly illustrated on revised plans.

It should be noted that Manual for Streets (MfS):

Section 7.2.10 states:

Shared surfaces can cause problems for some disabled people. People with cognitive difficulties may find the environment difficult to interpret. In addition, the absence of a conventional kerb poses problems for blind or partially-sighted people, who often rely on this feature to find their way around. It is therefore important that shared surface schemes include an alternative means for visually-impaired people to navigate by.

Section 7.12

Consultation with the community and users, particularly with disability groups and access officers, is essential when any shared surface scheme is developed. Early indications are that, in many instances, a protected space, with appropriate physical demarcation, will need to be provided, so that those pedestrians who may be unable or unwilling to negotiate priority with vehicles can use the street safely and comfortably

Section 7.13

When designing shared surface schemes, careful attention to detail is required to avoid other problems, such as:

- undifferentiated surfaces leading to poor parking behaviour;
- vulnerable road users feeling threatened by having no space protected from vehicles; and
- the positioning and quantity of planting, street furniture and other features creating visual clutter

Section 7.14

Subject to making suitable provision for disabled people, shared surface streets are likely to work well:

- in short lengths, or where they form cul-de-sacs
- where the volume of motor traffic is below 100 vehicles per hour (vph)
- where parking is controlled or it takes place in designated areas

The requirements of the Highways Authority are in line with national guidance as set out in MfS, however we have accepted the reduced number of pedestrian movements that would be generated by the development, hence why we have allowed for a reduced footway width of 1.2M thereby being reasonable in the assessment of the application. There needs to be a physical demarcation providing protection from vehicles.

Plots 3 & 4

Plans indicate dwellings to be provided with 2 parking spaces each (one in garage) accessed via an existing vehicle crossing from Kearsley Road.

Given the constrained nature of the access and the potential for vehicles to overrun adjacent land, the applicant should provide details of appropriate boundary treatment to prevent vehicles from encroaching onto neighbouring land.

A 4.2m wide access road is proposed and is considered acceptable. However, this width must be provided in addition to a 1.2m pedestrian footway, consistent with the requirement for Plots 1 and 2. The pedestrian footway should extend from the site entrance further into the development, as indicated below:



As previously advised, the Natural Environment Officer should be consulted to determine whether the proposed works may affect any adjacent trees.

All parking areas should be constructed using permeable materials to ensure that the development does not increase the surface water run-off from the site.

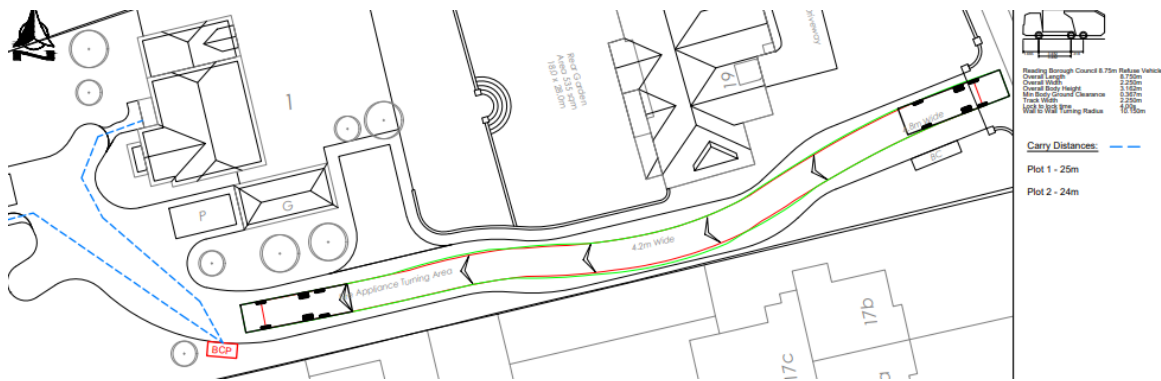
Electric Vehicle Charging

The Council's Local Transport Plan 3 Strategy 2011 – 2026 includes policies for investing in new infrastructure to improve connections throughout and beyond Reading which include a network of publicly available Electric Vehicle (EV) charging points to encourage and enable low carbon or low energy travel choices for private and public transport. The Council's Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point.

Refuse Collection

The applicant had initially stated that refuse vehicles would enter the site and a bin collection point was illustrated within the site as shown below in the extract from the tracking plans in the original Transport Statement dated October 2025.

Original Plan:



New plans in the recent/updated Transport Statement (Jan 2026) and submitted illustrative layout plan 22.19.0-21 identify the removal of the bin collection point within the site to areas adjacent to Parkside Rd and Kearsley Rd vehicle accesses as indicated in the extract below:



The bin collection point fronting Parkside Road will result in occupants from Plots 1 and 2 increasing the carrying distance to over 74m which is significantly more than the maximum carry distance of 30m. This would not be acceptable; Therefore, it is likely that a refuse vehicle would be required to enter and turn on site as was originally indicated by the applicant. Tracking plans will be required illustrating this manoeuvre without over running the pedestrian path.

Cycle Storage

In accordance with the adopted Parking SPD, each new dwelling will require a minimum of 2 cycle parking spaces for each C3 dwelling. In a development of this nature these can be provided in the private rear gardens of each dwelling.

Planning Natural Environment

The site was subject to a previous pre-application (24/0468) for 'Outline Planning Application for the demolition of an existing garage and outbuildings and erection of up to 9 no. dwellings, with access from Parkside Road and Kearsley Road'. This was not deemed acceptable in tree terms as the overdevelopment resulted in an unacceptable impact on trees and an unsustainable relationship with some retained trees.

Following the initial response provided in May, revised plans were submitted in April this year showing 6 dwellings. The negative response was similar. The Proposed plan for 6 dwellings showed:



The 'Illustrative Development Layout' now proposed is on drawing 22.19-021 C:



However, I note that this application is for 'access only' and hence will not confirm the layout, which could be subject to change at the reserved matters stage. Where impact on trees needs to be considered, it is normally relevant to also include layout to confirm acceptable impact. I note that 8.2 of the DAS states:

'The accompanying Illustrative Development Layout demonstrates how 4 No. detached houses could be accommodated on the application site, however, the final size and design of the houses is yet to be determined and will be the subject of a Reserved Matters Application'.

The application being for 'access only' also means that landscaping is not considered, which is important to demonstrate mitigation for tree loss and to meet with EN12 & EN14 requirements. 8.4 of the DAS confirms:

'Further details regarding layout, scale, appearance, and landscaping will be provided at the Reserved Matters stage, in accordance with local planning policy and guidance, should Outline Planning Permission be granted for these proposals'.

In relation to trees, there is unfortunately no Arboricultural Impact Assessment provided, as would be expected, hence I've had to extract details in the **Arboricultural Report Ref: 06260 / 2024 0.2 dated September 2025** alongside the associated **Tree Constraints Plan and Arboricultural Site Plan (Tree Removal)**. From the tree removal plan's list it can be seen that 39 trees are to be removed, of varying quality (it is assumed that the rest will be retained). From the descriptions of most of the trees, their loss would be acceptable subject to mitigation. I note that the removals include 5 B category trees: 2 young Beech (T036 & T038), a mature Himalyan birch (T065), a young Douglas fir (T070) and a young London Plane (T085). The two Beech are to be removed to allow for Plot 1, the Birch doesn't need to be removed, the D. Fir doesn't need to be removed and is not actually coloured red to indicate removal on the plan, and the London Plane requires removal to allow for the Parkside Road access.

Clarity on the reasons for removal of the Himalyan birch (T065) and Douglas fir (T070) is required given the absence of an AIA.

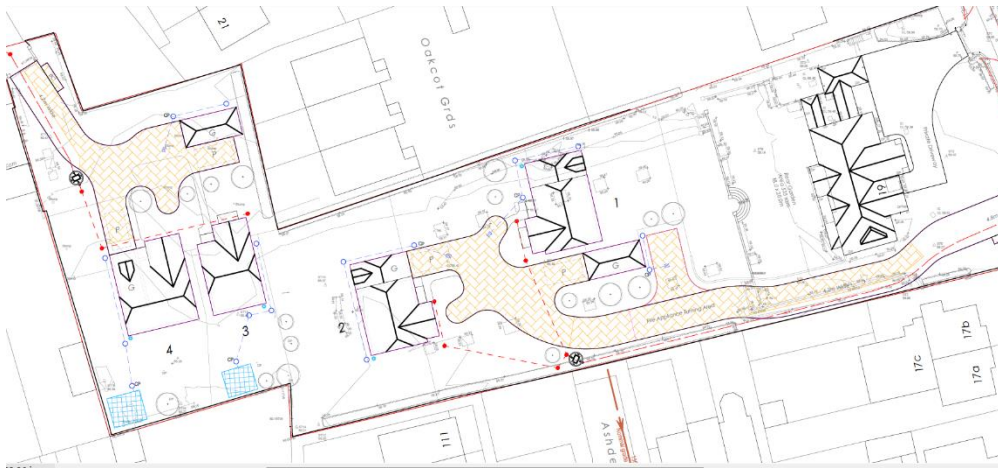
Whilst 4 houses may feasibly be accommodated and be acceptable in tree terms, albeit the tree impact appears not vastly different to the 6 plot layout, the normal tree assessment through submission of an AIA has not been provided which would clarify tree removal, provide principles of works within RPAs (mainly new access routes in this case), deal with services and assess impact of retained trees on future houses and gardens.

In addition, the outline nature of the application means that the size and footprint of the dwellings is not fixed – where trees are a significant constraint it is appropriate for this to form part of the formal considerations.

I note the intention to construct the development in two phases, as shown on Phasing Plan 22.19-030. The AIA should include reference to this.

In relation to landscaping, new tree planting is indicated on the Illustrative Development Layout and appears to include 17 new trees (so a net loss of 22 trees). No other landscaping is indicated and I note the Ecology Report includes no on-site habitat enhancement. Without further details of indicative landscaping, the development fails to demonstrate compliance with EN12 & EN14 or the adopted Tree Strategy. There is, of course, a link between the landscape provision and layout, the latter (as above) also not being considered under the application.

In relation to SUDS, the Proposed Drainage Strategy is shown on drawing 7188/402 B:



I have compared this with the Tree Removal plan (below):



From this comparison, it can be seen that the location of the two soakaways has not considered retained trees and are proposed in RPAs, which is not acceptable. The one in the garden of Plot 4 may require a tree to be removed to allow it (T031).

In conclusion, whilst development of 4 house may ultimately be supported in tree & landscape terms, the lack of inclusion of layout and landscaping in this outline application results in a failure to be able to properly assess both matters and demonstrate policy compliance (EN12 & EN14) and consideration of the adopted Tree Strategy.

If the application was amended to include layout and landscaping and an AIA and landscaping principles plan provided (to demonstrate policy compliance), the application may be resolvable from my point of view.

Additional information/Amended plans were received and reviewed by the consultant and the follow comments were made:

The 'Illustrative Development Layout' proposed is on drawing 22.19-021 C:



I previously expressed concern about the application being for 'access only' and related concern about final layout changing (in relation to trees), lack of demonstration of mitigation planting, i.e. demonstration that the development would comply with EN12 & EN14 and our adopted Tree Strategy. An AIA and landscape principles were requested.

I note that the planning agent's covering letter, in response to the above concern, states (with their emphasis):

'The Natural Environment Officer makes a number of references to the lack of landscaping proposals, and suggests that the application be amended to include layout and landscaping. This application is submitted in outline, with the principle of developing the site for 4 houses and access only for consideration at this stage. Landscaping details will be provided at a future reserved matters stage'.

This statement simply reiterates the nature of the application and what is sought, which was already understood. It does not respond to the concerns.

As per my previous comments, 8.4 of the DAS states:

Further details regarding layout, scale, appearance, and landscaping will be provided at the Reserved Matters stage, in accordance with local planning policy and guidance, should Outline Planning Permission be granted for these proposals'

This is a tight site in relation to trees, therefore it should be appreciated that there is little, to no, room for changing the layout from that currently shown (in relation to plots 1-3) and it still being largely acceptable in tree terms. Therefore, if layout is not confirmed in this outline application, it is expected that the layout shown at the reserved matters stage will not change significantly, if at all, and if it does, it risks being unacceptable.

In relation to trees, the AIA confirms 'the removal of 40 individual trees and one hedging group, of which over 92% are category 'C' or 'U' specimens with limited arboricultural and amenity value. Three category 'B' trees are proposed for removal; however, these are younger specimens with limited wider visual amenity value'. As mentioned in the agent's covering letter, the Tree Removal Plan confirms T065 & T070 (both B category) are now retained – their previous indicated removal was queried.

The AIA recognises the proximity of the trees along the western boundary to Plot 4 and that these will need to be periodically to maintain clearance. It is worth noting that the trees have the potential to increase in size. Ideally houses would be further away, or plot 4 omitted. This would also allow for further tree retention to assist with canopy cover loss and ecology concerns (see below).

In relation to landscaping, new tree planting is indicated on the Illustrative Development Layout and appears to include 17 new trees (so a net loss of 23 trees). No other landscaping is indicated and I note the Ecology Report includes no on-site habitat enhancement. Without further details of indicative landscaping, the development fails to demonstrate compliance with EN12 & EN14 or the adopted Tree Strategy. There is, of course, a link between the landscape provision and layout, the latter (as above) also not being considered under the application. I note that there are Ecology objections to the application also due to the lack of demonstrated mitigation and policy compliance. The lack of inclusion of 'landscaping' in this outline consent is therefore an issue.

I note the agent's covering letter states (under 'ecology') that 'It is not possible at this stage to calculate the gain ahead of a detailed landscaping strategy being prepared'. This statement demonstrates the need for landscape principles but in any case it is entirely reasonable to suggest, based on current submissions, that there will be a loss.

The limitations of this outline application make it difficult to fully assess both tree and landscape matters and demonstrate policy compliance (EN12 & EN14) and consideration of the adopted Tree Strategy. Tree matters have been addressed, albeit I have concerns about the proximity of the trees to Plot 4 and future pressure to prune or fell these. In terms of mitigation planting, if there is no change to the application description, it would still be appropriate to seek landscape principles, as previously requested, without which, concerns over policy compliance remains.

Ecology Consultations

The application site is a detached dwelling with large mature garden to the west of central Reading where it is proposed to erect four houses with associated parking and landscaping. A pre app for the erection of nine houses on this site was put forward in May 2024. The current application is for access only into the proposed site with all other matters reserved.

Access is proposed from both sides of the site — from Parkside Road to the east and via Kearsley Road to the west. It appears the existing house will remain unaffected by the development, although the garage will need to be removed to provide new access onto Parkside Road.

Our view is that the proposed development to the west of the site raises significant issues in relation to both the Biodiversity Net Gain (BNG) hierarchy and the degree of tree loss – 39 trees are proposed to be removed. The area to the west of the site (off Kearsley Road) is likely to be of most value for wildlife and includes numerous semi-mature and mature trees – all of which are categorised as medium-distinctiveness habitat.

The submitted BNG calculation shows a net loss of approximately - 4.35 biodiversity units equivalent to a loss of approximately -77%) mainly due to the loss of these trees. Such a large loss would require the purchase of at least five off-site units to achieve mandatory net gain. This would work out at a cost of approximately £100- 200k. The applicant may therefore wish to consider whether the scheme is viable in its current form.

Paragraph 008 Reference ID: 74-008-20240214 (<https://www.gov.uk/guidance/biodiversity-net-gain>) of the National Planning Practice Guidance (NPPG) sets out a clear BNG hierarchy, requiring applicants to demonstrate that biodiversity impacts have first been avoided, then minimised before considering off-site compensation. In this case it appears unlikely that the hierarchy can be complied with for the western area of the site as this is where most of the trees will be removed. The applicant may therefore wish to consider revising the scheme to remove the western element of the site.

The other section of the site within the central area is of lower ecological value and may be more acceptable in principle. However it is not clear how the proposals comply with local policies on biodiversity including EN12 (Biodiversity & the Green Network) and H11 (Development of Private

Residential Gardens) and the applicant should supply details of how the proposals will meet the requirements of these two policies.

Ecology report:

The report Turnstone (September 2025) has been submitted in support of the application:

The report states:

"The buildings and trees were assessed for their suitability for use by roosting bats, with particular emphasis placed on the areas in and around those being directly impacted by the proposals. The assessment involves a consideration of various factors including;

[...]

Based on these factors, an assessment was made of whether the buildings or trees might support bats and the type and number of roosts that might be present."

However while details of bat surveys of the buildings have been provided, no details of the bat surveys on trees have been provided. Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System) states that:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."

Unless you think otherwise, there are no 'exceptional circumstances' identified in the Ecology report. As such, the applicant will need to submit the results of bat surveys of the trees prior to determination of the application.

Additional information/amended plans were received and reviewed by the consultant and the following comments were made:

Our objection to this development still stands as set out in our comments on the 26th February 2026 ie:

"Regarding the outstanding bat survey information, we could condition a pre commencement check on the tree that does have low bat roosting potential.

However, our objection to the development still stands. While it may not be possible to accurately assess the net gain/loss at this stage as no finalised layout plans have been submitted, it is very clear that there will be a significant net loss. The applicant's 'rough' calculation suggests a loss of over 4 units which is significant, particularly for a site of this size. Our previous comments still stand – that is - while the development on the eastern side of the site is likely to be acceptable, this is not the case for the western extent of the site where a significant number of trees (which may constitute woodland) will be removed to accommodate the new houses. This loss does not comply with the mitigation hierarchy which prioritises the retention of existing habitats, followed by mitigation where retention is not possible, and finally compensation as a last resort.

No evidence has been provided to show how the proposals comply with the mitigation hierarchy or local biodiversity policy (EN12) . For example, it may be possible to reduce the number of houses, design smaller dwellings, or minimise the extent of hardstanding (for example: areas reserved for access, parking and patios) – all of which could reduce the large estimated biodiversity loss.

While the application is formally only for access, our objection still fully applies as access would not be required if the applicant doesn't intend to develop the site.

As such, any potential impacts associated with access are linked to the wider plans to develop the site and our concerns regarding biodiversity and loss of habitat (including a significant number of trees) are still relevant at this stage – particularly our point about the mitigation hierarchy and EN12

Conservation Officer Comment

Relevant policies and legislation

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (December 2024) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 216 states, "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

National Planning Practice Guidance on Historic Environment provides context to the NPPF. Guidance defines non-designated heritage assets as "Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets." It also says "It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies. (See the Historic England website for [advice on local lists](#)) They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record."

Local Planning Policy and Guidance

In line with the NPPF and NPPG, Reading Borough Council identified 'High Hesket, 19 Parkside Road' as a locally listed building on the 3rd December 2024.

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan sets out the Council's aspirations for the historic environment. The policy requires that

"Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- Listed Buildings;
- Conservation Areas;
- Scheduled Monuments;
- Historic parks and gardens; and
- Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List."

Policy EN4 'Locally Important Heritage Assets' of the Reading Borough Local Plan requires that development proposals that affect locally listed assets require to demonstrate they conserve architectural, archaeological or historic significance, including the appearance, character and setting of the asset. This policy further states "Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance."

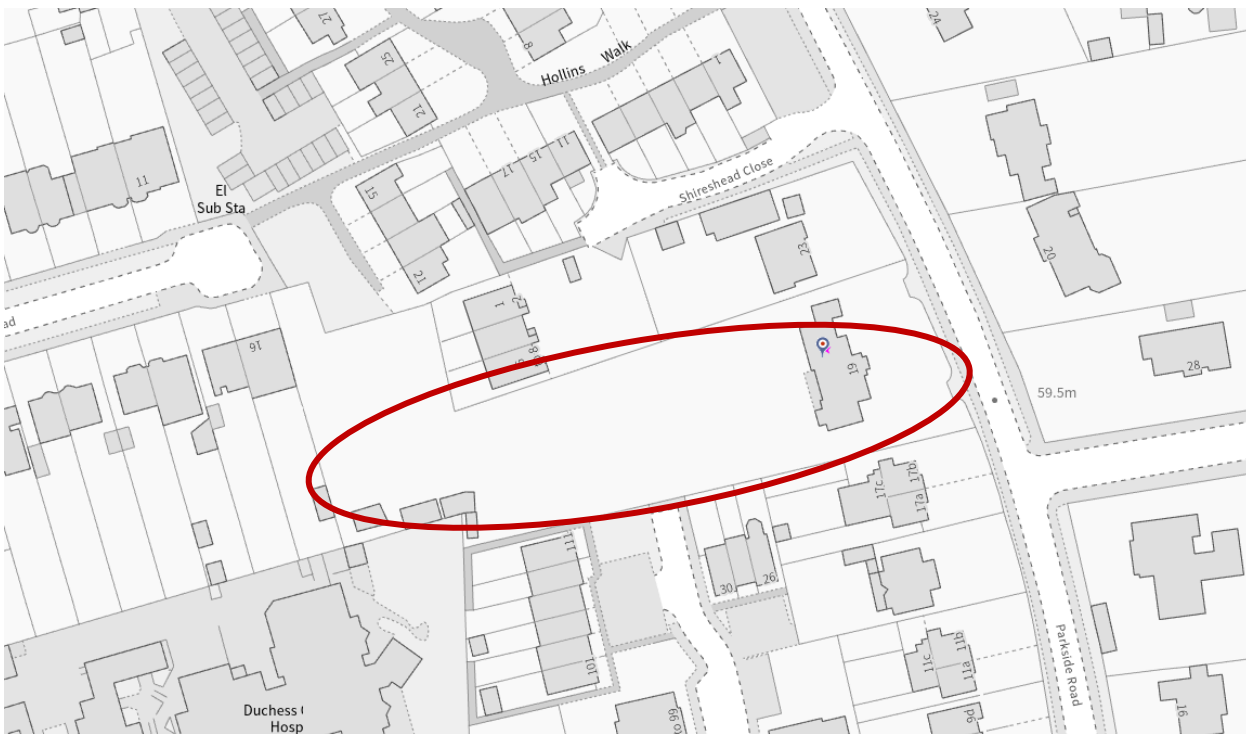
Policy EN6 'New development in a historic context' also requires "New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.

Other Guidance

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment".

Relevant heritage assets

The application site relates to the locally listed building known as 'High Hesket' at 19 Parkside Road, designed by a local architect, constructed in the 1930s with Arts & Crafts inspirations and used during civil defence in the Second World War. As illustrated below, located to the west of Parkside Road in Southcote, the building has a considerable scale, attractive appearance and a relatively large garden to its rear.



The

Application site (circled in red)

Significance of heritage assets

The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest.”

The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1.

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF, 2024)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The listing description reads as follows:

“‘High Hesket’, 19 Parkside Road is a detached house of 1935 designed by Conrad Birdwood Willcocks in the Mock Tudor style characteristic of the inter-war years, drawing on the influence of the Arts and Crafts movement and the revivalist traditions of the period. Constructed of red brick laid in Flemish bond with a hipped clay-tiled roof and black-painted timberwork, the house presents an asymmetrical façade with projecting gables framed in mock timber and white render, tall Tudor-style brick chimneys, and casement windows with leaded lights. An attached red-brick garage lies to the north, and the recessed arched porch further contributes to the architectural character. The property retains a high degree of integrity, with original internal features including an elaborately carved newel post with animal motifs, fireplaces with glazed tile decoration, beamed ceilings, built-in cupboards, and other bespoke joinery.

The house was built for, and possibly by, Joel Williamson Henry Perrin, a Reading builder who served in France during the First World War and later became deputy chief warden of the Air Raid Precautions (ARP) in Reading during the Second World War. During this period the property was used as ARP Headquarters for Region 6 and by local army personnel, with an underground shelter providing further evidence of its wartime role. These associations give the building strong historic significance in relation to Reading’s civil defence during the conflict. Willcocks, who began his career in Reading and became a Fellow of the Royal Institute of British Architects in 1920, was noted for his vernacular forms, careful brickwork, and bespoke interiors, qualities evident in this house as well as in his other works including All Saints’ Hall, Arthur Hill Baths, and the restoration of Watlington House. High Hesket is therefore of special local interest for its architectural quality, its intact interior and exterior features, and its strong historic association with Reading’s wartime civil defence.”

View of 'High Hesket', 19 Parkside Road

Impact of proposal upon heritage asset(s)

This is an outline application seeking permission for the erection of four residential units/dwellings in the rear garden of 'High Hesket'. However, I noted that this application is only for means of access, while all other matters are being reserved.

Regarding the proposed works, from the application form, planning statement, and Design and Access Statement, I noted that there would be two accesses, both of which would use the existing accesses from Parkside Road and Kearsley Road. Although the submitted layout is illustrative and the application form states all materials for the new dwellings are to be confirmed in the following phases of the application, two access/driveways would have a new surface material, 7 additional parking spaces, and red brick boundary treatments.

From the information provided/submitted and based on the illustrative development layout, I would like to make the following comments:

- *The proposed access would utilise the existing ones to the front and to the rear, which would have a little impact on the setting – existing layout arrangement of the heritage asset. Because the access from Parkside Road would be situated to the south, away from the existing underground shelter, without any impact on the fabric and appearance of the building. As such, if access is needed, the proposed one is the only option for this site with the least heritage impact.*

View of the entrance of the underground shelter, contributing the evidential and historic value of the building referring to its role in civil defence

- *Similarly, new development in the rear garden would also have an impact on the original layout with regard to the urban grain of this single plot of the locally listed building. The ratio of the rear and front gardens and the size of the original plot would be altered. However, it is considered that the proposed new size of the rear garden would be an acceptable size, although compared with the existing one, it would be radically reduced.*
- *It appears that the proposed layout would follow the existing building lines and urban grain characteristics of the surrounding area. They would have gardens with soft landscaping with a considerable amount of natural elements. As none of the proposed dwellings would have a larger footprint or scale than 'High Hesket', they would not be competing features, while High Hesket would be easily noticed with its architectural features. As such, my conclusion is that the proposed would result in less than substantial harm to the setting of the locally listed building.*
- *From the planning statement, I see that the benefits of the development proposal would be its response to housing need, financial contribution to affordable housing and social & economic benefits of construction. Because there should be a proportionate assessment of the significance and impact of the asset and the proposal, there is a high possibility that the benefits could minimise the harm. I would like to leave the final planning balance made by the planning officer. However, the proposed access are acceptable on heritage grounds with limited impact on the significance of the locally listed building.*

View of the existing rear garden

It is considered that the proposed access would result in less than substantial harm at a low level to the significance of the locally listed building 'High Hesket' at 19 Parkside Road. This harm would be limited and could be easily balanced with the public benefits. Therefore, the proposed development is in accordance with Policies EN1, EN4 and EN6 of the Reading Borough Local Plan and Chapter 16 of the NPPF.

Public Consultation

Several site notices were displayed on and around the application site and seven number of objections were received. These are summarised as followed:

- Access too narrow
- Intensification of traffic and parking on Kearsley Road
- Insufficient parking

- No visitor parking
- Unlawful development of widening the access
- Impact on amenity of neighbours
- Reduction in ecology and biodiversity
- Not suitable refuse arrangements
- Significant loss of trees
- Impact of the character of the area
- Uncertainty regarding the outline nature of the application
- Disturbance from traffic

4. LEGAL AND PLANNING POLICY CONTEXT

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).

Local Plan Partial 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 update 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.

Relevant Policies:

National Policy

National Planning Policy Framework 2024
National Planning Practice Guidance

Reading Borough Local Plan (Nov 2019)

CC1 (Presumption in Favour of Sustainable Development)
CC2 (Sustainable Design and Construction)
CC3 (Adaptation to Climate Change)
CC5 (Waste Minimisation and Storage)
CC6 (Accessibility and the Intensity of Development)
CC7 (Design and the Public Realm)

CC8 (Safeguarding Amenity)
CC9 (Securing Infrastructure)
EN1 (Protection and enhancement of the historic environment)
EN4 (Locally important heritage assets)
EN6 (New development in a historic context)
EN12 (Biodiversity and the Green Network)
EN14 (Trees, Hedges and Woodland)
EN15 (Air Quality)
EN16 (Pollution and Water Resources)
H1 (Provision of Housing)
H2 (Location, Accessibility, Density and Housing Mix)
H3 (Affordable Housing)
H5 (Standards for New Housing)
H10 (Private and Communal Outdoor Space)
H11 (Development of Private Residential Gardens)
TR3 (Access, Traffic and Highway-Related Matters)
TR5 (Car and Cycle Parking and Electric Vehicle Charging)

Supplementary planning documents/guidance

Revised Parking standards and design (2011)
Sustainable Design and Construction (2019)
Affordable Housing Supplementary Planning Document (2021)
Planning Obligations Under Section 106 (2015)
Tree Strategy (March 2021)
Annual Monitoring Report (2025)
Housing Needs Assessment (2024)
Local Transport Strategy 2040 (2024)

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.

5. APPRAISAL

Land Use Matters

Paragraph 123 of the National Planning Policy Framework (NPPF) states that: *“Planning policies and decisions 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 (Previously Developed Land)”*

In addition footnote 27 (Paragraph 62) states *“... strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable”*

As such, it is clear that the priority for development should be on Brownfield Land. The current site is therefore not the priority for development. Notwithstanding, the Reading Borough Local Plan includes policies which seek to facilitate appropriate development of land which is currently or was previously contained within residential gardens.

From a purely land use perspective, the proposal would broadly comply with the objectives of Policy H1 (Provision of Housing) by contributing towards meeting the housing needs within the Borough. However, this is subject to the more detailed consideration of relevant Local Plan Policies and the context of the application site. As the remainder of this report demonstrates, the proposal has failed to satisfactorily meet a number of other policy requirements.

Impact on the natural environment – trees and landscaping

Whilst landscaping is reserved, it needs to be established that the layout and access of the development would allow for soft landscaping on site (as part of a reserved matters) and would not result in harm to any existing trees on site.

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.

As discussed above the site is heavily constrained with trees. These trees are of amenity value as individual specimens but also importantly in terms of the amenity value of the verdant, green and undeveloped character. It has not been demonstrated that the amount of development proposed could be accommodated without harm to trees. This is in part due to layout and scale being reserved matters, combined with the fact the AIA demonstrates the site is constrained in terms of trees and that even to accommodate the amount of development proposed would require of 40 trees and vegetation which contribute positively to the amenity of the area taken as whole.

Added to the failure to protect existing trees, the proposal fails to demonstrate the amount of development could be accommodated in a way which allows for sufficient additional tree planting and other soft landscaping which would be reasonably required to preserve the character of the area.

The agent states that *‘This application is submitted in outline, with the principle of developing the site for 4 houses and access only for consideration at this stage. Landscaping details will be provided at a future reserved matters stage’.*

This raises the fundamental point that that the amount of development is in fact a key consideration and that should this be granted then the LPA couldn’t reasonably resist a scale, layout and form of landscaping which would reasonably associated with that amount regardless of impact or harm.

The agent's covering letter states (under 'ecology') that 'It is not possible at this stage to calculate the gain ahead of a detailed landscaping strategy being prepared'. While this is acknowledged what can be concluded is there would be a significant loss coverage at the site and a lack of adequate compensation. It is therefore not been demonstrated the development is capable of having an acceptable in relation to trees and landscape matters and demonstrate policy compliance with EN12 & EN14.

The Council's Natural Environment team have been consulted and are objecting due to the above reasons.

Ecology and biodiversity

The application site is a significant rear garden with a significant tree coverage; there is a heavy concentration of tree coverage within the western section of the site.

In accordance with Policy EN12, all development would be expected to not result in a net loss of biodiversity. Any net gain should be provided wherever possible. Mandatory biodiversity net gain requirements as implemented in 2024 also apply to the proposed development.

The proposed development results in the loss of 40 trees. The area to the west of the site (off Kearsley Road) is likely to be of most value for wildlife and includes numerous semi-mature and mature trees – all of which are categorised as medium-distinctiveness habitat.

The submitted BNG calculation shows a net loss of approximately - 4.35 biodiversity units equivalent to a loss of approximately -77%) mainly due to the loss of these trees. The application has not demonstrated that any significant on-site credit is proposed.

Paragraph 008 Reference ID: 74-008-20240214 sets out a clear BNG hierarchy, requiring applicants to demonstrate that biodiversity impacts have first been avoided, then minimised before considering off-site compensation. It has not been demonstrated that the hierarchy can be complied with for the western area of the site as this is where most of the trees will be removed. It is acknowledged that the central area where plots 1 and 2 are illustrated may be able to comply with the BNG Hierarchy as it has a lower ecological value.

It is acknowledged due to the outline nature of the application it may not be possible to accurately assess the net gain/loss at this stage as no finalised layout plans have been submitted, however what can be established is there will be a significant net loss. The applicant's calculation suggests a loss of over 4 units which is significant, particularly for a site of this size. It is considered no evidence has been provided to show how the proposals comply with the mitigation hierarchy or local biodiversity Policy EN12. It is also considered the proposal would result in the fragmentation of rear gardens which would result in an adverse on biodiversity contrary to policy H11.

Although the PPG states that it is generally inappropriate to refuse an application on the grounds that the biodiversity gain objective will not be met, it is necessary to consider if the BNG condition is capable of being successfully discharged. As such, insufficient information has been provided and as BNG is a statutory requirement, this is a matter of principal importance in this case and failure to comply is a fundamental flaw of the proposal as the LPA cannot be satisfied that the BNG requirement would be secured.

The RBC Ecologist has been consulted and has objected due to the above reasons.

Highways

Policy TR5 'Car and Cycle Parking and Electric Vehicle Charging' states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. In accordance with the adopted Parking Standards and Design SPD each dwelling would require 2 off road parking spaces. In addition to this existing parking provision would need to be retained for No19 Parkside Road. Each parking space should be 2.5m wide by 5m long and have forecourt depths of 6m to ensure that spaces can be manoeuvred in and out of easily. Any garages or car ports would need to conform to the Councils adopted standards.

The proposed development will be accessed from both Parkside Road and Kearsley Road. Plots 1 and 2 will be accessed from Parkside Road, and plots 3 and 4 will be accessed from Kearsley Road.

The existing dwelling will continue to be accessed from Parkside Road via the northern access. Given the plot size there is considered sufficient space available within the driveway for vehicles to park off-street. This arrangement is considered acceptable.

Plots 1 to 2 will be serviced via a widened access from Parkside Rd. The access will need to be 4.8m wide to accommodate vehicles entering and exiting the site as well as to allow for a refuse vehicle and a car to pass one. The illustrative layout plan shows that the access is not 4.8m the entire length of the access nor does it include a 1.2m pedestrian footway. While a carriageway width of 4.2m may be acceptable over short distances a pedestrian access would be required for the entire length. As manual for street states shared surfaces causes difficulties for certain uses such as those with physical or mental disabilities.

Plots 3 & 4 indicate dwellings to be provided with 2 parking spaces each (one in garage) accessed via an existing vehicle crossing from Kearsley Road. Given the constrained nature of the access and the potential for vehicles to overrun adjacent land, it has not been demonstrated that the access has appropriate boundary treatment to prevent vehicles from encroaching onto neighbouring land. While a 4.2m wide access is proposed along the entire access the 1.2m pedestrian footway has not.

The requirements of the Highways Authority are in line with national guidance as set out in MfS, however RBC Highways in this instance have accepted the reduced number of pedestrian movements that would be generated by the development, hence why they would allow for a reduced footway width of 1.2m thereby being reasonable in the assessment of the application. There needs to be a physical demarcation providing protection from vehicles and no pedestrian access would not be acceptable in this instance.

illustrative layout plan 22.19.0-21 have removed the bin collection point previously illustrate within the site to areas adjacent to Parkside Rd and Kearsley Rd vehicle. The bin collection point fronting Parkside Road will result in occupants from Plots 1 and 2 increasing the carrying distance to over 74m which is significantly more than the maximum carry distance of 30m as such would not be acceptable; Therefore, it is likely that a refuse vehicle would be required to enter and turn on site as was originally indicated by the applicant. The proposed access arranged is therefore not acceptable.

RBC Highways have been consulted and are objecting to the proposal due to the reasons stated above.

Affordable housing

The proposal seeks to create four new dwellings and, therefore, a contribution towards off-site affordable housing provision is required as part of the application in accordance with policy H3 and the Affordable Housing SPD under Section 106 of the Town and Country Planning Act 1990. On sites of 1-4 dwellings, this equates to 10% of the GDV of the development.

As per the SPD this would be progressed through submission of a minimum of two independent valuations to allow the Gross Development Value (GDV) to be determined. This has not been submitted and an appropriate amount has not been agreed.

The Council's affordable housing policies are clear in explaining the severe and persistent need to deliver affordable housing in the Borough and to assist the Council in meeting the requirements of the NPPF which states at para 63 that: "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes".

The provision of affordable housing is a major issue in the Borough. The Borough experiences high levels of affordable housing need as evidenced by paragraphs 11-14 of the Reading Local Housing Needs Assessment (Appendix G) indicating around 113 households in need annually. Reading residents face major issues relating to affordability as a result of high and increasing house prices compared to average local incomes and significant issues in the future supply of affordable housing to meet identified needs. These matters are detailed below to demonstrate that local circumstances justify significant weight being given to the delivery of affordable housing and conversely, substantial harm arises from the failure to secure its provision on the provision of mixed and balanced communities.

The Reading Borough Local Plan 2019 is now more than five years old. 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 in respect of the Local Plan policies pertinent to affordable housing remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be 'out of date'. Whilst it is acknowledged that Policy H1 is out of date, Policy H3 is not considered to be out of date.

A revised version of the NPPF was published in December 2024. Paragraph 65 suggests that Affordable Housing should not be sought on sites of fewer than ten dwellings. This is consistent with government policy since the Ministerial Statement of November 2014 which set out this policy approach more or less in the same form. The Council's Local Plan includes Policy H3 which was adopted in 2019, after this government policy change and was adopted based on robust justification provided at examination in respect of the particular housing needs of Reading Borough. It is the Council's opinion that the current NPPF does not alter the weight that should be given to the NPPF policy and that the Local Plan should be the primary basis for determination in accordance with s.38(6) of the Planning and Compulsory Purchase Act 2004.

The approach taken by the Local Plan 2019 is that the need for affordable housing in Reading is so significant that there is a justification for seeking contributions to affordable housing from all sizes of residential development, from one dwelling upwards, and therefore forms part of adopted Policy H3. The only exceptions offered by Policy H3 are for one-for-one replacement dwellings and for residential conversions from houses to flats where there is no additional floor space created as part of the proposal (and therefore no additional planning harm/strain on affordability).

The NPPF (2024, para 35) requires Development Plans to set out the level and type of affordable housing provision required. National planning policy therefore requires local planning authorities to plan for the identified need for affordable housing in their areas.

There remains to be a dire need for affordable housing within the Borough, as evidenced by the Council's most recent Annual Monitoring Report (2024-2025 (January 2026), page 28 – (see Appendix H), the delivery of affordable housing within 2024-25 is extremely low (11 completions). This is set against the backdrop of high housing delivery, with 890 new dwelling delivered within 2024-25 (higher than the annual target of 689 homes per annum as per Policy H1).

Policy H1 was adopted, following significant justification and interrogation through the local plan making process. The housing figures contained within it, were adopted in conjunction with policy H3 (affordable housing). There is an inherent link between the provision of housing, and the provision of identified needed affordable housing, and creating mixed and balanced communities. The supporting text of policy H3 states:

(4.4.23) "The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision."

An up-to-date assessment of the need for Affordable Housing that exists in the Borough is within the supporting text for Policy H3 (para 4.4.21) of the Reading Borough Local Plan Submission Draft Partial Update May 2025 which states the following:

"The Reading Housing Needs Assessment (HNA, 2024) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can".

Whilst the principle of an affordable housing contribution has been agreed by the applicant, this did not advance to a stage where affordable housing was secured. Given the identified need as discussed above this will form a reason for refusal. An informative will be included to state that this reason for refusal may be able to be overcome. The LPA will work pro-actively with the applicant to secure affordable housing provision if these wished to resolve this prior to any appeal.

Design and Heritage

Policy CC7 aims to preserve or enhance the character of the area in which a development is in terms of layout, landscape, density, scale, height, massing, architectural detail and materials.

Policy EN1 of the Reading Borough Local Plan sets out the Council's aspirations for the historic environment. The policy requires that "Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced

Policy EN4 of the Reading Borough Local Plan requires that development proposals that affect locally listed assets require to demonstrate they conserve architectural, archaeological or historical significance,

including the appearance, character and setting of the asset. This policy further states “Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset’s significance.”

Policy EN6 ‘also requires “New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.

The NPPF (Para 131) sets out that good design is a key aspect of sustainable development. The National Design Guide 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’.

In terms of layout this includes buildings, routes and open spaces within the development and the way they are laid out in relation to buildings and spaces outside the development.

Whilst the layout, scale and appearance of the building are to be determined, the indicative plans demonstrate a development which would result in plots 4 and 3 accessed off Kearsley Road and plots 1 and 2 off Parkside Road, with each residential plot having its own rear garden and parking. The proposed access would utilise the existing ones to the front and to the rear, which would have a little impact on the setting of the listed building as these are existing. The access from Parkside Road would be situated to the south, away from the existing underground shelter as such would not impact on the fabric and appearance of the building. Notwithstanding, access concerns are discussed elsewhere in this report.

The proposal would result in an alteration to the character of the site however the existing plot would still retain a relatively large rear garden for No.19 Parkside Road (High Hesket) itself (it is acknowledged this is significantly reduced from the existing but the site is large) with the indicative plans showing the buildings having a meaningful separation distance to the existing dwelling. In terms of the wider context of the site the proposed layout would largely follow existing building lines and urban grain characteristics of the surrounding area as such would not be out of character. They would have gardens with a degree of soft landscaping with none of the proposed dwellings having a larger footprint or scale than ‘High Hesket’ as such would not have competing features, as such would not detract from High Hesket actuarial and historic features.

As above, appearance of the buildings is not a consideration of this application and would be for a future reserved matters application. However, the Design and Access Statement submitted suggests that buildings would incorporate features and materials that are considered to reflect nearby properties as such officer considered that future reserved matters application are capable of being discharged in terms of design. The proposed development is not considered to be significantly tall and height is kept reasonably low. As such, the scale, height and mass of the development is considered acceptable.

The RBC Conservation Officer has raised no objection to the proposals on heritage terms. It is considered that the proposed access would result in less than substantial harm at a low level to the significance of the locally listed building ‘High Hesket’ at 19 Parkside Road. This harm would be limited and is considered to be balanced with the public benefits. Therefore, the proposed development is in accordance with Policies CC1, EN1, EN4 and EN6 of the Reading Borough Local Plan and Chapter 16 of the NPPF.

Residential Amenity

Policy CC8 of the Reading Borough Local Plan requires that “Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook ...”

Amenity of future occupiers

The dwellings would be expected to provide rooms of an adequate size in line with the Department for Communities and Local Government – Technical housing standards – nationally described space standards. Policy H5 of the Reading Borough Local Plan (2019) states that ‘new build housing should be built to the following standards: a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard’. Policy H5 also states that ‘ensuring sufficient levels of internal space is essential to the quality of life of residents of the Borough, which is a key element of the vision of the Borough’. It is indicated that the dwellings would be 50 sqm which would comply with the space standards, but further detail on this would be required at reserved matters stage. However, in principle it is considered that the plots could accommodate dwellings that would meet the nationally prescribed space standards.

Policy H10: *Private and Communal Outdoor Space sets out that ‘Dwellings will be provided with functional private or communal open space’*

The proposed rear amenity space as shown on the illustrative plans show an appropriate rear garden plan and given the plot size it is considered that a good level of both indoor and outdoor amenity can be accommodated at the site; however, gardens may be hampered by trees and there may be pressure to prune, as discussed elsewhere in this report

Amenity of neighbouring properties.

Whilst layout and scale is not a matter being applied, for the illustrative layout shows there would be meaningful separation distance to neighbouring properties as well as boundary treatment which would mitigate views as such it is considered that window to window distances could be found to be acceptable and would not adversely impact neighbouring properties in terms of privacy. Given the plot size and number of units it is considered the site can accommodate 4 residential units without resulting in undue harm to the amenities of neighbouring properties. While the layout is a reserved matters given the site area, likely height, positioning and design the proposals are not considered to result in undue harm to neighbouring amenity.

As discussed above it has not been demonstrated the proposed accesses of Kearsley Road can be accomplished without encroaching onto neighbouring land. While this is a land ownership matter and outside the scope of planning this could potentially impact amenities.

Sustainability

Policies CC2 ‘Sustainable Design and Construction’, CC3 ‘Adaptation to Climate Change’ and H5 ‘Standards for New Housing’ of the Reading Borough Local Plan 2019 all include increased standards for sustainable homes and for proposals to respond to climate change.

Should the application have otherwise been recommended for approval, conditions would have been recommended to ensure the development meets the following requirements:

- Higher water efficiency standards of 110 litres per person per day; and
- A 19% improvement over building regulations energy requirements

Although secured by planning condition, these requirements would have been administered through the Building Regulations, with confirmation of compliance submitted to the LPA to discharge the condition.

CIL

Community Infrastructure Levy (CIL) would be applicable to this proposal. If the scheme has been acceptable, an information statement would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

Matters Raised in Representations

Regarding the letters of representation received the majority of concerns have been addressed above. In terms of construction impact while it is acknowledged this can disrupt neighbours this is not a material planning consideration nevertheless if the proposal was recommended for approval then a construction management plan would have been conditioned to help mitigate the impact. In terms of the nature of outline applications, these are a part of the planning framework and while this may be confusing to members of the public the type of application is not a planning consideration.

Planning Balance

The NPPF is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

Paragraph 11 of the NPPF deals with the presumption in favour of sustainable development, setting out that, for decision taking this means:

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:

- 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*
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the 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 affordable homes, individually or in combination.*

Footnote 8 of the NPPF provides further clarification on decision-taking for applications involving the provision of housing and assessing when policies which are most important for determining the application are out-of-date. Footnote 8 states that this includes situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer), 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.

In relation to five-year supply of deliverable housing sites the Council accepts that we are currently not in a position to demonstrate a five year housing land supply (plus the appropriate buffer) as such the 'tilted balance' is engaged.

When the tilted balance is engaged, it is necessary to conduct a planning balance in determining applications and the balance is whether the harms 'significantly and demonstrably' outweigh the benefits of granting permission when assessed against the policies in the NPPF.

It is acknowledged that there would be some planning benefits associated with the proposed development, such as the provision of 4 dwellings to assist with the Borough housing targets. However, this is a general benefit and not specific to the site and other housing land is available. There would also be some limited economic benefit during construction. Some further development of the site appears to be possible focusing the development on less sensitive areas of the site.

However, whilst the layout, landscaping, scale and appearance of the proposal is subject to reserved matters application, there is insufficient evidence to show that the amount of development proposed could be accommodated within the site without resulting in harm elsewhere. Specifically, the proposed development would result in a significant loss of biodiversity and the application fails to demonstrate that the Biodiversity Gain Hierarchy has been complied or demonstrated that the amount of development proposed can be accommodated together with appropriate new tree planting, retained trees and associated landscaping, sufficient to preserve and not harm the character, appearance, visual amenity and environmental quality of the site. The proposal is also considered to prejudice highway safety.

Given the above concerns, the proposal is not considered to be well-designed and nor would it provide affordable housing.

The proposal is considered to result in significantly and demonstrably harm which outweighs the benefits when assessed against development plan policies and the policies in the Framework taken as a whole.

6. CONCLUSION

Having regard to the material considerations and all matters raised, the Local Planning Authority considers that the balance of considerations therefore weighs firmly against the proposal, and outline permission is recommended to be refused.

7. RECOMMENDATION

The outline planning permission is refused for the following reasons:

1. The application fails to demonstrate that the amount of development proposed can be accommodated without harm to existing trees of amenity value to be retained, including a future pressure to prune or fell these trees. Contrary to Policies CC7, EN14 and H11 of the Reading Borough Local Plan 2019, the Reading Tree Strategy 2021 and paragraphs 136, 187 of the NPPF 2024.
2. The application fails to demonstrate that the amount of development proposed can be accommodated together with appropriate new tree planting, retained trees and associated landscaping, sufficient to preserve and not harm the character, appearance, visual amenity and environmental quality of the site. The proposals are therefore contrary to Policies CC3, CC7, H11, EN12 and EN14, the Reading Tree Strategy 2021 and paragraphs 136, 162, 187 and 193 of the NPPF 2024.

3. The proposed development would result in a significant loss of biodiversity and the application fails to demonstrate that the Biodiversity Gain Hierarchy has been complied with or that if planning permission were to be granted, the biodiversity gain condition could be discharged. The proposal is therefore contrary to Policies EN14 and H11 of the Reading Borough Local Plan 2019 and paragraphs 187 and 193 of the NPPF 2024.
4. The application fails to demonstrate that the proposal would avoid a net loss of biodiversity within the site. This is due to a failure to demonstrate the protection of trees which exist as features of biodiversity interest within the site and the provision of new tree planting, wildlife friendly landscaping and other ecological enhancements. The development would also result in an unmitigated fragmentation and loss of rear garden habitats which contribute to biodiversity and the wider green network resulting in an adverse impact on biodiversity.
The proposal is therefore contrary to Policies EN12 and H11 of the Reading Borough Local Plan 2019 and paragraphs 162, 187, 192 and 193 of the NPPF 2024.
5. The proposed development would result in a substandard access route for vehicles and pedestrians which would have an unacceptable adverse effect on road safety and the flow of traffic. The proposal is therefore contrary to Policies TR1, TR3 and H11 of the Reading Local Plan 2019 and paragraph 115 of the NPPF 2024.
6. In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough and the need to provide sustainable mixed and balanced communities. The proposed development is, therefore, contrary to Policies H3 and CC9 of the Reading Local Plan 2019, the Affordable Housing SPD 2021 and paragraph 64 of the NPPF 2024.