

DELEGATED APPLICATION REPORT

Ward: Thames Ward

App Ref: PL/26/0601 Householder planning permission

Address: 28 Coldicutt Street, Caversham, Reading, RG4 8DU

Proposal: Retrospective permission for the demolition of an outbuilding and erection of a replacement outbuilding

Applicant: Mr Ian Williams

Received date: 6 May 2026

Target Decision date: 1 July 2026

Case Officer: Anthony Scholes

1. SITE DESCRIPTION

- 1.1 The application site is the rear garden of a mid-terrace property located on the eastern side of Coldicutt Street in lower Caversham. The surrounding area is residential of similar architectural style, while the rear gardens include various garage buildings of differing age and design. The property has a rear outrigger, and an extended rear garden. This garden has access via Mill Road.
- 1.2 The site is not listed, nor in a conservation area. However, it is located within Flood Zone 3b.

2. PROPOSAL AND SUPPORTING INFORMATION

- 2.1 The application seeks retrospective permission for the demolition of an existing garage structure to the rear of the site (facing Mill Road), and erection of a single-storey building. The original structure, was a single-storey timber clad outbuilding, measured 3.6m in length, 2.2m in width, and ~2.8m in height.



Figure 1 - 'Streetview' Image of former structure

- 2.2 The retrospective development relates to a building which is purported as an incidental outbuilding for use as storage, and a home office/gym.
- 2.3 The development for which the application seeks retrospective permission for is a structure which is 3.13m in height, 3.17m in width, and 10.6m in length built in brick with a felt flat roof. Within the narrow plot (4.5m width), the outbuilding has been constructed 21m from the rearmost point of the existing dwelling, and 6.8m from the rear boundary. The proposed plans show a blurring of lines between the proposal and the property boundary. At the site visit, it was clear that the building is constructed very close to the fence line. The roof may overhang the property boundary with 26 Coldicutt Street.



Figure 2 - Site Visit Photographs

2.4 The Applicant has stated that the application has been submitted following correspondence from Reading Borough Council to regularise the development. It is understood that Planning Enforcement Officers have been alerted to the construction of the development, the Applicant has noted that the proposal does not comply with the provision of outbuilding in accordance with the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (GPDO). The applicant has stated that the proposal is to be used for purposes incidental to the enjoyment of the dwellinghouse, though has not described in detail how the facilities match the purpose of its use. The building has been described as having electricity and water supply from the main house.

2.5 The application was supported by the following plans and documents

Application Form

The 'Pyramid Planning', Planning statement (ref: PP/HPA/28CS/2026), dated 22 April 2026

Drawing No: B.01 Rev A – Site Plan

Drawing No: C.02 Rev A – Proposed Elevations

Drawing No: D.02 Rev A – Proposed Floor Plans

Drawing No: TQRQM26103114420058 – Location Plan

As received by the Local Planning Authority on 6 May 2026

The 'RIDA reports', Flood Risk Assessment (ref: R0846 FRA-v1) dated May 2025

Drawing No: D.02 – Rev B – Proposed Floor Plans

Drawing No: C.02a – Rev A – Proposed Elevations Boundary Context

Drawing No: C.01 – Rev A – Existing Elevations (prior to demolition)

Drawing No: B.01a – Rev A – Site plan (1:50)

As received by the Local Planning Authority on 27 May 2026

The 'Pyramid Planning', e-mail response to public comments, dated 22 June 2026

As received by the Local Planning Authority on 22 June 2026

3. CONSULTATIONS

3.1 The following were consulted:

- Transport – No objection subject to conditions, on the basis that the proposal would only be incidental to the use of the main house.
- EA – EA advised that standing advice should be followed, however have advised that given the flood zone (3b), that consideration of flood mitigation measures and design requirements for the proposal.

3.2 Two site notices were placed at the site (on per road frontage) on 29 May 2026, the period for comments of 21 days expired on 19 June 2026.



Figure 3 - Site notice photos

3.3 Two letters of objection have been received and are summarised below:

- Concern around flood risk and compliance with national and local planning policy
- Concern over scale, height and proximity to neighbouring boundaries, and overall design and construction quality
- Potential harm to neighbours' amenity
- Concern around the adequacy of technical information provided
- The claimed replacement nature of the development
- The potential non-incidental use
- Concern around impact on neighbouring structures as a result of construction activity
- Concern regarding capacity of sewage/waste water drains

4. RELEVANT PLANNING HISTORY

Application Site

- 4.1 PL/19/0095 - Single storey rear extension to an existing dwelling. Withdrawn 1 February 2019
- 4.2 PL/19/0590 - Single storey rear extension with internal alterations. Approved 3 June 2019. *Officer Note: This application has been implemented.*
- 4.3 PL/19/0195 - Rear extension measuring 4.0m in depth, with a maximum height of 3.2m, and 2.9m in height to eaves level. Notification of the construction of an extension under class A Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015. Prior Approval Given 7 March 2019. *Officer Note: This application has been implemented.*

Adjoining Properties

30 Coldicutt Street:

- 4.4 PL/16/1568 - Single storey rear extension and new detached garage in rear garden. Granted 2 November 2016. Implemented.
5. EQUALITY ACT
- 5.1 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.
6. LEGAL AND PLANNING POLICY CONTEXT
- 6.1 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'.
- 6.2 The following local and national planning policy and guidance is relevant to this application:
- 6.3 National
National Planning Policy Framework (December 2024, as amended)
National Planning Policy Guidance;
- 6.4 Reading Borough Local Plan 2019
CC7 (Design and the Public Realm)
CC8 (Safeguarding Amenity)
EN18 (Flooding And Drainage)
H9 (House Extensions and Ancillary Accommodation)
H10 (Private and Communal Outdoor Space)
TR3 (Access Traffic and Highway-related Matters)
TR5 (Car and Cycle Parking)
EN12 (Biodiversity and the Green Network)
EN14 (Trees, Hedges and Woodlands)
- 6.5 Supplementary Planning Documents
Design Guide to House Extensions (2021)
Revised Parking Standards (2011)
- 6.6 Other Documents
Environment Agency Guidance – Preparing a flood risk assessment: standing advice
Environment Agency Guidance – National flood risk standing advice for local planning authorities
- Local Plan Update*
- 6.7 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 pre-submission draft was submitted to the Secretary of State on the 9th of May 2025 and is currently at examination.

- 6.8 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.
- 6.9 Officer advice in respect of the Local Plan policies pertinent to this application listed above is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the appraisal below and are not considered to be ‘out of date’.

7. APPRAISAL

Character and Appearance

- 7.1 Policy H9 states that, in considering ancillary accommodation such as granny annexes, they will be acceptable where it would not be capable of operating as a separate dwelling which could be let or sold separately. Policy CC7 seeks to ensure all development maintains and enhances the character of the area in which it is located.
- 7.2 The outbuilding which has been constructed is significant, being ~31.5m² of internal floor area. The design includes a flat roof and one large opening to the front and rear, with two opening to the south, and one to the north. The remaining garden area for the host property would be ~97m². The building is constructed in close proximity to the side boundaries, possibly overhanging the boundary (~19cm at the furthest point). The site plan has not clearly provided details of the distance to all boundaries. It was noted on the officers site visit that the building was not parallel with the side boundary.



Figure 4 - Site Photo showing building relative to side boundary

- 7.3 The building has been constructed with a separate entrance to the rear, including a fence separating the rear access from the rear garden. The outbuilding is split into two by an internal dividing wall, with the 11m² ‘storage’ area independently accessible from the rear garden. The remainder (~20m²) of the proposal, is independently accessible from the Mill Road. The proposal

includes all facilities necessary for separate accommodation, including wall sockets (capable of plugging an electric hob into), kitchen sink and cabinets, toilet and shower. Whilst no cooking facilities are shown, the proposal could accommodate basic cooking equipment. The Applicant has stated that the services (electricity, water, sewage) are provided from the main house. Whilst this is not shown on any plans, there is no evidence on site which indicates independent water or power service. A service trench from the main dwelling appears visible during a RBC Planning Enforcement Site Visit on 15 October 2025.



Figure 5 - Planning Enforcement Site Visit Photograph 15 October 2025

- 7.4 Notwithstanding that the proposal does not seek permission for a separate dwelling, it cannot be ignored that the site has been laid out in a way that would seek to introduce a dwelling by stealth. Given that the property is clearly perfectly capable of being used as an independent dwelling, with all facilities required for separate use (with minimal alterations beyond installing a cooking hob), including a separate access, the proposal would introduce an additional dwelling by stealth (as explicitly referenced within the Local Plan supporting text to Policy H9 (paragraph 4.4.76)). Therefore, the proposal would be contrary to Policy H9 in this respect. It is noted that a Householder application would be unable to seek permission for a separate dwelling, and a full planning application would instead be required.
- 7.5 In terms of the design and appearance, the proposal is a very large building in the rear garden, set off the boundary as little as possible. The plot coverage of the building amounts to a significant built footprint in this portion of the site. The height of the building as compared to other outbuildings is considered excessive and is likely necessitated by the intention of separate accommodation (i.e. as a precursor to seeking compliance with the Building Regulations). The design of the building is clearly greater in scale than all other outbuildings within the area and

therefore fails to respect the character and appearance of the area. It generally appears that the other outbuildings are used as garages with large openings for vehicle storage. The cumulative height, plot coverage and proximity to boundaries are considered significantly and demonstrably harmful compared to other building fronting Mill Road.

Use as an Incidental Building

- 7.6 The proposal seeks to demonstrate that the purpose of the building is incidental to the main use of the dwelling. The proposal includes an independently accessible area with a kitchen (including fridge and sink), bathroom (including toilet and shower). Policy H9 (House Extensions and Ancillary Accommodation) states:

“In addition to the above, ancillary accommodation, such as granny annexes, will be acceptable where it would not be capable of operating as a separate dwelling which could be let or sold separately.”

- 7.7 The supporting text goes on to state (4.4.76):

The provision of ancillary accommodation, such as granny annexes, can be one housing solution to some of these trends. However, this ancillary accommodation should not be a way of introducing new dwellings by stealth. Therefore, planning conditions and, where necessary, obligations will ensure that extra accommodation remains ancillary to the main dwelling. Ancillary accommodation could be considered a separate dwelling where it:

- *Is self-sufficient in terms of facilities e.g. kitchens and bathrooms;*
- *Has its own front door without internal links to the main house; and/or*
- *Has its own external facilities, e.g. access, drive, garden; or has scope for these external facilities to be easily created.*

- 7.8 The building would include sufficient facilities and would have its own front door without internal links to the main house. It has its own access, drive, and scope for garden subdivision from the main house to easily create a separate garden. The Applicant has stated that a condition could be applied to control the use as incidental to the main dwelling, however given the ease in which the use could transition, or be let and/or sold separately, it would not appear that a condition would be sufficient to control the use. However, it would remain that the proposal is in excess of what would be required for incidental use, and the provision of a kitchen and bathroom for a home office and gym is not reasonably required.

- 7.9 The applicant has stated that the proposal is to be used for a home office, or a gym. It has not been described in any detail as to why a home office, or a gym would need both a shower room, toilet and kitchenette. In overall terms, it would appear, by way of the layout, and arrangement of doors, and provision of facilities that the rear of the proposal is intended to be used as a separate unit of residential accommodation. It is provided with a sink and drain pipe for washing of dishes, includes a fridge for storage of food and beverages, it has a shower and toilet, as well as independent access. Therefore, in combination with the external layout, the proposal exceeds what is considered reasonably required for an incidental use of an outbuilding. Putting it another way, there are more indications that this has been specifically built for independent residential accommodation purposes, than for incidental residential purposes.

Provision of outdoor space

- 7.10 Policy H10 seeks to ensure that dwellings are provided with functional private open space suitable for its needs. The guide with Policy H10 seeks that the outdoor space be the same as the floorspace for the dwelling it serves. The proposal would retain ~97m² of garden space, this

remains in excess of the floor area for the main dwelling (~90m²) based on measurements from the plans associated with other applications related to the site).

- 7.11 Whilst the retained garden is larger than the main dwelling's floor area, it would not be larger than the cumulative area of the main dwelling and the proposal. This does not mean the retained garden would be insufficiently useable in itself, and is likely to be suitable and useable for residents, and is not considered a reason to refuse the application.

Flood Risk

- 7.12 Policy EN18 of the Reading Borough Local Plan (2019) states that:

“Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding. Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.”

- 7.13 The NPPF (2024, as amended) outlines a sequential risk-based approach to be taken by individual applications within areas known to be at risk from flooding, including the sequential approach to those developments. As per paragraph 176 of the NPPF some minor developments and changes of use should not be subject of the sequential test nor the exemption test. Footnote 62 clarifies that Householder development would form a type of 'minor development' not subject to the sequential test. As such, the development application as made (being a Householder type development) would not be subject to the sequential or exemption tests. It is noted that an application for the provision of a separate dwelling at the subject property, however, would be subject to the sequential and exemption tests (should the sequential test be passed).
- 7.14 Paragraph 181 of the NPPF seeks that when determining application, LPAs should ensure that flood risk is not increased elsewhere. In addition, development should in only be allowed in areas at risk of flooding where it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
 - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
 - d) any residual risk can be safely managed; and*
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan*
- 7.15 The Environment Agency (EA) Standing Advice also considers what should be included within a flood risk assessment, and how an LPA should consider flood risk assessments.
- 7.16 The application site is located wholly within flood zone 3 (at a 1 in 100 chance of flooding due to its low-lying nature near to the River Thames) as per the EA flood mapping. The application site is not near the edge of flood zone 3. As per the Reading Borough Council Strategic Flood Risk Assessment (SFRA), the application site is located within flood zone 3b (functional flood plain). The proposed building is considered to be partially 'more vulnerable' as the rear portion would be

capable of being used as a dwellinghouse, and the front would be storage associated with a dwelling, and be 'less vulnerable'. The Applicant has stated that the vulnerability classification is considered to be 'less vulnerable'. While the LPA contends it could also be classified as 'more vulnerable' it would not materially impact the assessment below should be it be 'less vulnerable'.



Figure 6 - Application site and flood zone extract from Environment Agency Mapping (left) (June 2026 extract); location of site in flood zone 3b as per SFRA (right) (2017)

- 7.17 The PPG at Table 2 (Paragraph: 079 Reference ID: 7-079-20220825) sets out the acceptability of development in light of its flood risk vulnerability and flood zone and clearly states that only Water Compatible or Essential Infrastructure can be permitted in Flood Zone 3b.

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Figure 7 - PPG extract flood risk acceptability

- 7.18 Though there may be some disagreement between the LPA and the Applicant as discussed regarding the vulnerability classification, only Water Compatible development, or essential infrastructure are justifiably suitable for the location. As such, though a detailed flood assessment of the flood risk is undertaken below, the development is unacceptable in principle for the location given the flood zone category as per Table 2 above.

- 7.19 Accordingly, the development would be at an unacceptable risk of flooding. Thus, it conflicts with Policy EN18 of the Local Plan, insofar as it seeks to direct development away from areas at the

highest risk of flooding, in line with the requirements of the Framework. The scheme also conflicts with the flooding protection aims of the NPPF.

7.20 As per the standing advice a flood risk assessment was required as the site is located within flood zone 3b. The guidance also states that a Sustainable Drainage System (SuDS) should be provided for all developments within flood zone 3. It is noted, as above that the sequential and exemption test is not required for householder developments. The EA standing advice, following identification of the above, requires LPA's to assess whether the following have been considered, each will be taken in turn:

- *all sources of flood risk affecting the proposed development now and throughout its lifetime have been assessed*

7.1.1 The flood risk assessment (FRA) has identified that the proposal is at high risk of surface flooding, and a very low risk of groundwater flooding. The proposal identifies that the external flood water depth would be 1.02m in a flood event (from river flooding). The FRA has identified that surface water risk is considered to be 0.3m for overland flows. The FRA has identified that a freeboard of 0.3m above the flood level for the site is considered reasonable, in lieu of a 0.6m above flood level due to the certainty of information on flooding within the area. However, this would result in a ground floor level 1.32m above natural ground level. . It suggests however that due to access and site constraints, that a level 1.17m below the flood level (37.05 AOD) is proposed. It has not stated what access, or site constraints exist to justify this, though it is clear that an exceptionally tall building elevated out of the flood risk, either on stilts, or through an extended brick base with a void, would not be suitable in design terms. The FRA suggests that the proposal should be designed with materials suitable for a water exclusion strategy up to a water depth of 1.02m (including communications wiring, heating systems, electrical services, water, electricity and gas meters). It is noted that the building, as constructed, includes a number of electrical installations that appear to be well below this design flood height. The FRA provides details of flood appropriate foundations, and slabs, as well as external wall systems be incorporated. However, no detail on whether this has been implemented has been included.



Figure 8 - Site photo showing external power point below designated flood design level

- *the development type is incompatible with the proposed location*

7.1.2 As per Table 2 above, the development, as a less vulnerable as purported by the Applicant, would be incompatible with the proposed location.

- *the measures proposed will make the development safe throughout its lifetime*

7.1.3 The measures proposed, may mitigate the risk of flooding on the future users. However, it is clear that the installation of some electrical services are below the flood level identified (clearly externally), it would appear the services are run through the main house to the proposal. The construction methodology is also not clear, and on the basis that other flood mitigation measures have not been implemented, there is no certainty that the development has been constructed in line with the mitigation measures proposed within the flood risk assessment. In addition, the provision of a new dwelling, with overnight sleeping, within an area of high risk of flooding, would introduce a sensitive use into a flood zone. It is possible that due to the high flood risk, there may be more limited warning in a flood event, and there would be a high risk that inundation could occur whilst occupants are sleeping. In addition, given a lack of escape routes, and flood levels of 1.32m, the entire property (outbuilding) would be flooded, and would likely result in damage to all items within the building, and would displace an occupant for an extended period of refurbishment and repair. Whilst moving to an upper floor may be appropriate for an incidental building, given the ease at which the rear could be separately let, and access to the main house removed (through locking of an external gate), it would not appear possible for future occupants to shelter at first floor within the main building.

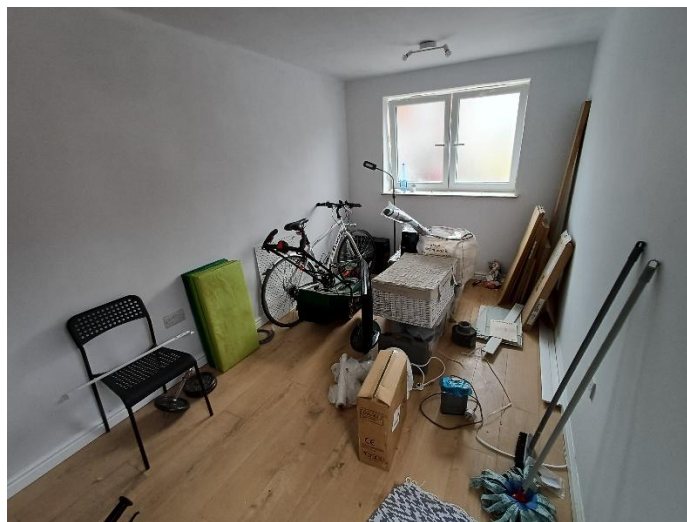


Figure 9 - Internal view of independent rear portion of proposal, showing low power sockets

- *the proposed development will be appropriately flood resistant and resilient*
- 7.1.4 As per the above comment, the mitigation measures have not been demonstrated as being implemented, and in part are clearly not implemented. As such, there is no certainty that the development, as constructed is appropriately flood resistant and resilient.
- *the proposed development will increase flood risk elsewhere and, if so, that appropriate mitigation has been included*
- 7.1.5 The applicant's FRA states that there would be no increased footprint of the development compared to the pre-existing outbuilding. However, this is incorrect. No pre-existing site plan has been provided showing the now demolished outbuilding. However, based on the pre-existing elevation plans, which show a width of building being 2.87m (with a 10m length), whereas the proposal would be 3.15m in width, with 10.58m in length. As such, there would be a ~4.63m² increase in the ground coverage of the building. Figure 9 below also confirms the narrower width of the original building, albeit a similar sized roof. An increase in ground coverage would impede the flow of flood water around the building and would result in an increase in flooding onto neighbouring properties. The applicant has not provided any information or comment on this and therefore has failed to demonstrate suitability in this regard.



Figure 10 - 2020 Google Earth Aerial Photograph (left); 2019 Google Streetview showing footprint of original outbuilding (right)

- *the site has been laid out, so the most vulnerable aspects of the development are located in areas of lowest flood risk*

7.1.6 No area of the site is located at a lower area of risk, and the vulnerable aspect of the development are within flood zone 3b. Sleeping provision is proposed below the flood level, which is considered unacceptable.

- *any residual risks can be safely managed*

7.1.7 In accordance with PPG (041 Reference ID: 7-041-20220825) Residual risk comes in two main forms:

- *Residual risk from flood risk management infrastructure; and*
- *Residual risk to a development once any site-specific flood mitigation measures are taken into account.*

...
And

...
Examples of residual flood risk to a development include:

- *a failure of flood forecasting or flood warning and the risks associated with people not receiving warnings or acting upon them.*

7.1.8 The Applicant's FRA includes heading 8 within the contents table as 'Residual Risk'. However, no comment or consideration of residual flood risk has been made. As outlined above, in the event of failure of flood forecasting, or flood warnings being acted upon, given the ground floor habitable accommodation is 1.02m below the flood level of the site, in tandem with the lack of escape routes or on-site refuge (discussed below), there is a significant residual risk to life as a result of the development. This residual risk has not been considered, and poses an unacceptable risk to life within the development. In addition, no comment on the residual risks associated with the lack of installation of mitigation works as proposed has been provided. As outlined elsewhere within this report, there is no certainty or confirmation that the recommended mitigation measures have been implemented given the clear existence of electrical installations below the design flood height (1.32m).

- *safe access and escape routes are included where appropriate, as part of an agreed emergency plan*

7.1.9 The FRA states that occupants of the site would be encouraged to sign up for flood alerts. It also states that occupants should follow the safe evacuation routes. Paragraph 8.7 states that “No safe evacuation route has been found suitable for this site. It is necessary to provide safe refuge on the first floor of the building”. However, it is noted that the proposal is a single storey building, as such no safe evacuation route, or area of on site refuge has been identified.

- *the proposed development incorporates SuDS*

7.1.10 The FRA states: “With no increase in the rate of surface water discharge from the site, compared to the site in its current configuration, the proposed development would have no adverse impact on surface water flood risk at the site or surrounding area. The SuDS should be designed at the detailed project stage.”. No other information on SuDS has been provided. As such, the development has not incorporated SuDS. In addition to the hard surfacing to the rear of the proposal would reduce the ability for rainwater to infiltrate the land and should include an appropriate SuDS strategy. As such, the proposal has failed to demonstrate incorporation of SuDS.

7.21 With regards to Policy EN18, and the NPPF (2025, as amended), the proposed development would increase the site coverage of the building on the land. This would reduce the capacity of the floodplain to store floodwater, and impede the flow of floodwater on the subject property, resulting in an increased risk, of either flow velocity or height, on neighbouring sites. The use of the building as habitable accommodation, either associated with the main dwelling, or as an independent dwelling would pose an unacceptable risk to life.

7.22 It has not been demonstrated that the proposed development has been constructed in line with the recommendations of the flood risk assessment. It is possible that the building could not be quickly brought back into use without significant refurbishment, partly due to the location of electrical fittings below the flood design height. There is no demonstration that the building has been constructed with materials and treatment appropriate for its flood water level (below 1.32m) as required, which could result in inundation and significant repair and refurbishment of the external and internal walls in the event of a flood. The residual risks have not been considered, and the risk to life in terms of the EA’s definition and examples of residual risk are not considered to be appropriate to allow habitable accommodation to be located in this area. No safe access, or emergency escape routes are included, nor an agreed emergency plan, and the emergency plan proposed is to have residents escape to first floor (or a single storey proposal).

7.23 As such, given the proposal includes development that is not suitable for the flood zone, the proposal could not be considered acceptable. Notwithstanding that the development has not demonstrated the above to a sufficient degree. The development would result in an increase in flood risk to neighbouring properties, and impedes and redirects flood water to neighbouring properties. The proposal would result in significant harm to life and risks to occupants contrary to policy EN18 of the Reading Borough Local Plan (2019), and paragraph 181 of the NPPF (2024 as amended).

Residential Amenity

7.24 Policy H9 states that a development will be acceptable where it does not result in an overbearing impact on neighbours. Policy CC8 states development will be acceptable where it will not cause a significant detrimental impact to the living environment of existing or new residential properties.

7.25 Though close to all neighbouring properties, the development would not be considered to harm the living conditions of neighbours due to the existing boundary treatments, and the location of

the development near other outbuildings, and to the end of the garden (i.e. not immediately adjacent to primary outdoor areas).

- 7.26 The proposal would present large openings toward the existing garden of the property, and the secondary road frontage. Given the portion of the development facing inward to the site and neighbouring gardens would be associated with the main dwelling, and only have limited openings, it would not be likely to result in undue privacy impacts on the host property or neighbouring properties. The proposal is considered to be a separate residential unit, would look onto the highway of Mill Road. This would not be an uncommon relationship for ground floor windows, and would not result in significant harm to the living environment of future occupiers.
- 7.27 For the separate residential unit, it is not clear, given the proposal does not acknowledge that it is a separate unit, what the arrangement for access to the amenity space would be. However, the shared provision of amenity space, would likely prejudice the use for both properties and may result in harm to the overall provision of amenity space. Non-provision of amenity space for a dwelling would not be considered acceptable.

Trees

- 7.28 Policies CC7 and EN14 of the Reading Borough Local Plan 2019 seeks to protect existing trees. No trees on site were removed to facilitate the development, and the adjoining mature tree to the north is likely to be far enough away to not have the roots impacted. Given the development has already taken place, any harm to the tree roots would only become evident over time, and as such, there is limited meaningful information that could be provided as part of this application. Given the retrospective nature of the development, any harm to the neighbouring trees will have regrettably already occurred, and therefore cannot be controlled through condition should approval have been recommended. However, the proposal may result in pressure to prune the trees.

Transport and highways related matters

- 7.29 Policies TR1, TR3, and TR5 seek to ensure development does not have a detrimental impact on highways safety or operation. The proposal is for an outbuilding, and not a separate unit of accommodation. The site would not change the parking provision on the site, and would retain one parking space at the rear. The Highway Authority has not objected on the basis of the proposal. However, have requested that the proposal only be used as incidental to the main dwelling. This, as above, is not considered reasonably possible to secure or enforce given the access arrangements and layout of the proposal. Were the proposal a separate unit of accommodation, the Highway Authority would object on the basis that the proposal would displace parking from a site, within an area of high on street parking pressure.

7.30

Other Matters Raised in Objections

- 7.31 The objectors raised two additional points that are not considered above:

Concern around adequacy of technical information provided

- 7.32 The objector notes the following issues (summarised): annotated measurements, dimensioned comparison plans, clear boundary measurements, flood resilience measures, SuDS information, safe refuge arrangements, sufficient information on the demolished buildings.

- 7.33 The application has been considered on the basis of the building constructed on site, and whilst the plans are lacking dimensions, have a scale and can be measured. It is agreed that there are issues with the measurements to boundaries, and the Agent has been unable, or unwilling to clarify through amended plans. The remainder are considered above.

Concern around impact on neighbouring structures

- 7.34 Whilst the proximity of the building to neighbouring structures could result in concern for those landowners, it would be considered a private matter between landowners. Though, the proximity to boundaries, and potential overhang of the roof would be a private matter, it would also be a technical issues as to whether the application red line encompasses the entire development.

Capacity of sewage/waste water drains

- 7.35 The concern relates to a sewer pipe, and use for the proposal. The sewer is maintained and operated by Thames Water. They would be responsible for ensuring sufficient supply and capacity of waste water, and therefore is not a material planning consideration.

8. CONCLUSION

- 8.1 Due to the scale, plot coverage, and form of development, including internal layout. The proposal is considered to be capable of separate accommodation, and therefore contrary to, inter alia, policy H9 of the Reading Borough Local Plan 2019. The proposal is also considered to be unacceptable within the flood zone in which it is located contrary to Policy EN18 of the Reading Borough Local Plan 2019 and the NPPF (2024 as amended). The design of the proposal, is also considered to be excessive in scale and height and is out of keeping with the scale of outbuildings within the vicinity of the site contrary to policy CC7 and H9 of the Reading Borough Local Plan 2019.

9. RECOMMENDATION

- 9.1 Refuse Full Planning Permission.