

DELEGATED APPLICATION REPORT

Ward: Thames Ward

App Ref: PL/26/0479 Full planning permission

Address: 20 COLDICUTT STREET, CAVERSHAM, READING, RG4 8DU

Proposal: Change of use of the ground floor of 20 Coldicutt Street from Class E (Retail) to Class C3 (Residential) to create x1 bedroom self-contained ground floor flat. Reconfiguration of existing first floor flat in C3 use to provide self-contained 2 bedroom maisonette across the ground, first and second floor, with a new main rear access proposed for the 2x bedroom flat.

Applicant: Mr Jeremy Simmons

Received date: 08/04/2026

Target Decision date: 15/07/2026

Case Officer: Nathalie Weekes

1. SITE DESCRIPTION

The application site is a two storey mid-terrace building and has a long rear garden. The main access is from Coldicott Street and there is a secondary rear access and off-street parking from Mill Road.

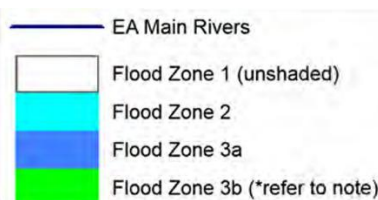
The CIL form states that the current gross internal area to be retained is 112 sqm. The application form states *'The application property forms part of an established terrace and was historically used as a butcher's shop at ground floor, with residential accommodation above'*.

The building currently comprises an unauthorised 1-bedroom ground floor flat (the previous Whittings Butchers), which includes front and rear access, and there is an independent 3-bedroom flat on the ground (rear), first and second floors (as observed at the Officer site visit).

The existing flat to the rear of the former shop unit, is accessed from the rear Mill Road with the entrance and kitchen on the ground floor. The subdivision of the building into two flats with the arrangement of access to the rear flat from the rear has no planning permission and has not been lawfully confirmed through a Certificate of Lawfulness.

The site is not Listed, nor located within a Conservation Area. The address falls within the RBC SFRA Map F4_C Rev A Character Area Central map as within zone 3b. There is a note stating that Flood Zone 3b 'Developed' refers to 'areas of 'previously developed land' which are to be considered equivalent to Flood Zone 3a sites for planning purposes and Flood Zone 3b is 'Functional floodplain' The existing dwelling is considered as 3a, however the garden would be considered as functional floodplain 'as an area of open space where water has to flow or be stored in times of flood. It is also in an Air Quality Management Area.

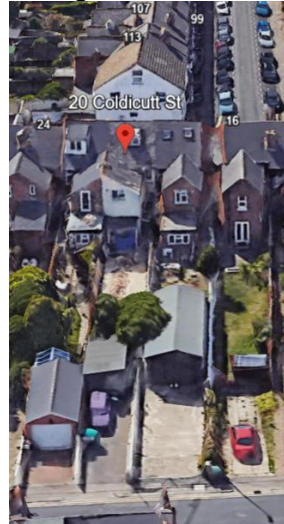
SFRA Map F4 C Rev A



Site frontage - Google maps



Google earth rear view



Google maps – photo of the rear of Coldicutt Road properties facing onto Mill Road



Rear of the site photo taken at the site visit



Fence panels for garden areas and safe egress/access



2. PROPOSAL AND SUPPORTING INFORMATION

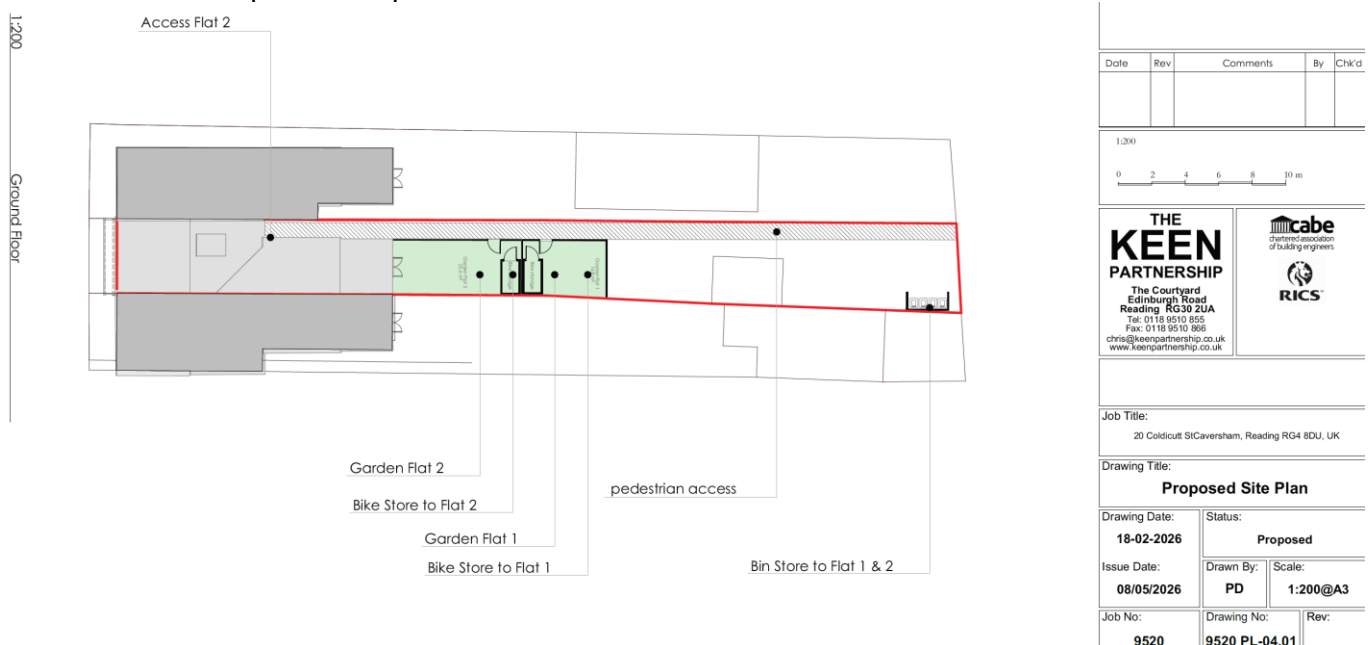
The application seeks a retrospective change of use of the ground floor of 20 Coldicutt Street from Class E (Retail) to Class C3 (Residential) to create a 1-bedroom self-contained ground floor flat. The proposal also includes reconfiguration of the existing rear flat to create some additional space at ground floor for the proposed ground floor flat. The ground floor flat created would be approx. 41sqm with a kitchen and living area. In addition, the proposal includes altered rear accesses for both flats.

The rear flat would include a kitchen access to the rear garden and a living area at ground floor, 2 bedrooms and bathroom on the first floor, and ancillary space on the second floor with a total of approximately 57.9sqm (excluding second floor space).

No extensions are proposed, but there would be limited changes to the external appearance through the amendment to windows and doors at the rear.

Bin stores and cycle provision are proposed at the rear, with a proposed external garden area for each flat which includes part of the existing rear garden only as can be seen in the 9520 PL-04.01 Proposed site plan below.

9520 PL-04.01 Proposed site plan

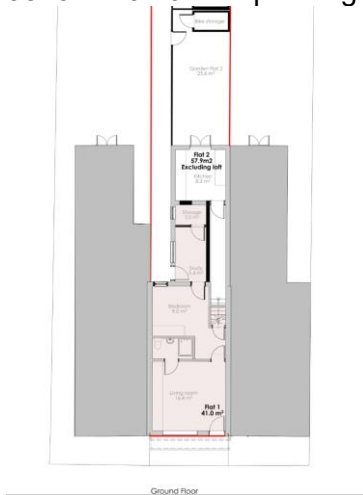


Materials proposed are for walls to remain as render and for white uPVC windows and doors.

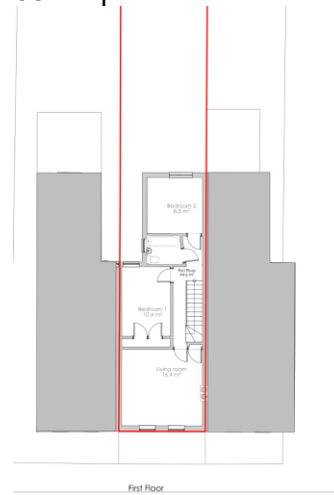
The application has been submitted following correspondence from the Reading Borough Council Enforcement team to regularise the creation of a ground floor flat from a conversion from Class E. An enforcement letter was issued on 28 October to the owner/occupier stating that 'breach of planning control has occurred at the aforementioned property, namely conversion of the ground floor from a shop (Use Class E) to a self-contained flat without planning permission.' Given the refusal of prior approval application and the existing unauthorised use of the ground floor, the letter advised '*the Council considers there is little prospect for the use for the ground floor of the property as a self-contained flat in its current format. The development appears at odds with policies CC7 (Design and the Public Realm), CC8 (Safeguarding Amenity), EN18 (Flooding and Drainage), H5 (Standards for New Housing) and H8 (Residential Conversions) of the Reading Borough Local Plan (2019) and paragraphs 130 and 181 of the National Planning Policy Framework (NPPF) (2024).*

However, given that the lawful use of the ground floor as a shop within Use Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended) may no longer be viable, you may wish to explore alternative uses for this part of the property or the use of the property as a whole.'

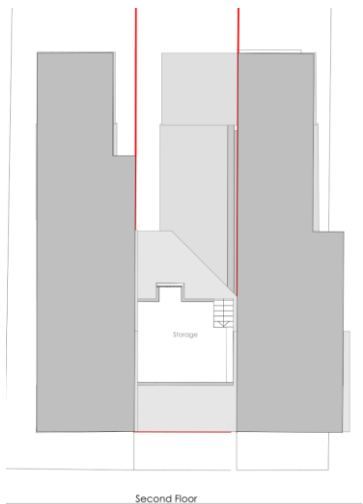
9520 PL-04.02 Proposed ground floor plan



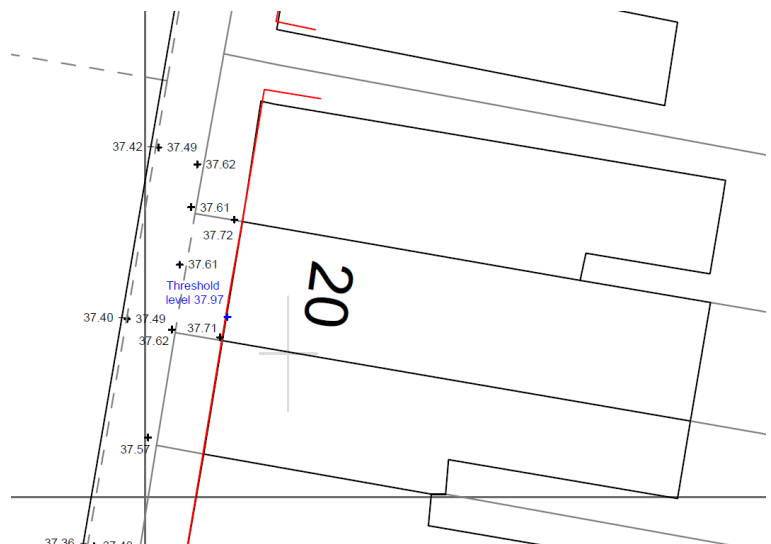
9520 PL-04.03 Proposed First Floor Plan



9520 PL-04.04 Proposed Second Floor Plan



Geo26-009 Level survey



Plans and documents submitted

Planning statement, The Keen Partnership

9520 PL-01 Location Plan

9520 PL-03.01 Existing Ground Plan

9520 PL-03.02 Existing First Floor Plan

9520 PL-03.03 Existing Second Floor Plan

9520 PL-03.05 Existing Elevations

9520 PL-03.06 Existing Side Elevation

9520 PL-02 Existing Block and Proposed Block Plan

9520 PL-04.02 Proposed Ground Plan

9520 PL-04.03 Proposed First Floor Plan

9520 PL-04.04 Proposed Second Floor Plan

9520 PL-04.06 Proposed Elevations
9520 PL-04.05 Proposed Roof Floor Plan
9520 PL-04.01 Proposed Site Plan
TC26002 COL-TCE-XX-XX-RP-C-0001_Flood_Risk_Assessment_P02, March 2026, Taylor consulting Engineers
Geo26-009 Level survey
CIL
As received 8 April 2026

Affordable housing statement, The Keen Partnership
9520 PL-04.01 - Proposed Landscape Site Plan
Landscaping and biodiversity note, The Keen Partnership
As received 20 May 2026

3. RELEVANT PLANNING HISTORY

200129/RPA - Change of use from A1 to C3 Dwellinghouse (Flat x 1). Prior Notification under Class M, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). Withdrawn 07/09/2020.

201183/FUL - Change of use from commercial to residential. Plan from shop to one bedroom flat and outbuilding for extra space for gym/playroom. Cannot entertain Certificate under Article 11 13/04/2021.

PL/22/1513 Change of use from Class E (Butchers) to C3 (dwellinghouses) to comprise 1 bed flat on the ground floor. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 Refused 02/12/2022 in relation to flood risks, provision of adequate natural light and non-compliance with minimum space standards.

4. CONSULTATIONS

The following were consulted:

- **Business Rates** – No comments at the time of writing the report.
- **Council Tax Consultations** - I can confirm we do have two properties entered into the banding list for CT purposes for this property. The ground floor flat (previously a commercial unit) has been banded for CT purposes since 29.11.2023. The existing first floor flat has been banded since at least 01.04.1997. Both properties are separately let out to tenants.
- **Environment Agency EA**– No comments at the time of writing the report.
- **RBC Planning Natural Environment** - The LANDSCAPING AND BIODIVERSITY NOTE indicates some landscaping will be included, but it's not shown or indicated on Proposed Site Plan 9520 PL-04.01. The site is within an AQMA so a higher priority for tree planting, or alternative landscaping if trees can't be accommodated. Aerial photos indicate some existing vegetation / trees at the rear – not shown on plans, but which wouldn't be impacted. A landscaping condition is recommended - condition L1.
- **RBC Ecology** - The site comprises a former butcher's shop in a residential part of Lower Caversham which will be converted into flats with the existing rear garden divided accordingly.

The changes within the house appear to be predominantly internal with changes to the configuration required and as such a bat survey would not be needed. No photos of the garden were provided with the application, however aerial images from google mapping appear to show it as predominantly non-vegetated. Local plan policy EN12 requires that development ...” *should*

provide a net gain for biodiversity...". As such, if approved, it would be appropriate to include a standard landscaping condition to any planning permission, requiring the submission and implementation of a landscaping scheme that includes native and wildlife friendly landscaping

- **RBC Environment Protection** - We recommend the following informative.

Informative - Noise between residential properties – sound insulation of any building

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

- **RBC Transport** - The site is located within the Zone 2, the primary core area but on the periphery of the central core area which is an area at the very heart of Reading Borough, consisting primarily of retail and commercial office developments, with limited residential. This area is well served by rail and bus links and is in close proximity to Reading Station (North Entrance).

In accordance with the Council's current adopted standards each 1 and 2 bedroom unit would require 1 parking space. There is an existing area of hardstanding at the rear of the site served by an existing vehicle crossing accessed via Mill Road, it is not clear if this parking area is to be allocated to the new unit, our records show that the existing unit has been issued with a valid resident's permit.

Clarification is required if parking is being provided at the rear of the site if it is, it will need to be illustrated in relation to the bin storage/collection area from Mill.

If parking is not going to be provided at the rear, then the dropped crossing should be realigned and reinstated with the footway which will need a licence from the Highway Department and illustrated on plans.

Revised plans are required confirming the use of the hard standing at the rear and vehicle crossing.

- **Planning Enforcement** - Planning application (PL/26/0479) has been submitted with regards to the use of 20 Coldicutt Street, my investigation into the development is now closing. Planning Enforcement will only get involved again if the application is refused and if requested to do so. This is because it is not considered expedient to take enforcement action when there are considerations of planning applications.
- **Legal** - No comments at the time of writing the report. No draft heads of terms have been provided for review.
- **Valuations**– No comments at the time of writing the report. No valuations have been provided to assess an appropriate affordable housing contribution.
- **Waste Operations** - The Council's standard household waste collection service is for fortnightly general waste collections, fortnightly recycling collections, and weekly food waste collections. Separate glass recycling collections are being introduced in the near future and will be collected fortnightly.

A development containing 2 residential units would need to have space for the below bins:

2 x 140L general waste

2 x 240L recycling

2 x 23L food waste caddy

2 x 55L glass container

I note on the proposed site plan document there is space drawn for 4 bins of unknown size or waste type.

Please ask that consideration be made for all of the above required bins and confirm that there is dedicated space for them all within the boundary of the property.

It seems that all bins are planned to be stored at the rear of the property. Please confirm if this is correct? Is there rear access at the property to enable bins to be collected from there? Please note that residents are required to present their bins for collection at the curtilage of their property for collection. Crews would not enter secure front/rear gardens directly to retrieve bins.

Is the space at the rear also designated for parking? Will the presence of vehicles obstruct access to the bins on collection day?

Neighbour consultation

Two site notices were displayed at the front and rear of the site on 10 June 2026, with the 21-day period of consultation expiring on 1 July 2026. No letters of representation have been received.



Communications with the agent

The agent was asked whether they wished to withdraw the application but confirmed that they wished for the application to be determined and decision issued.

EQUALITY ACT

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. 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'.

The following local and national planning policy and guidance is relevant to this application:

National

National Planning Policy Framework (December 2024, as amended)

National Planning Policy Guidance;

Reading Borough Local Plan 2019

CC1 (Presumption In Favour of Sustainable Development)
CC2 (Sustainable Design and Construction)
CC3 (Adaptation To Climate Change)
CC7 (Design and the Public Realm)
CC8 (Safeguarding Amenity)
EN12 (Biodiversity And The Green Network)
EN14 (Trees, Hedges And Woodland)
EN18 (Flooding and Drainage)
H1 (Provision of Housing)
H2 (Density and mix)
H3 (Affordable Housing)
H5 (Standards for New Housing)
H8 (Residential Conversions)
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)
RL3 (Vitality and Viability of Smaller Centres)

Supplementary Planning Documents

Affordable Housing (2021)
Revised Parking Standards (2011)
Planning Obligations under Section 106 Supplementary Planning Document (2015)
Sustainable Design and Construction (2019)
Residential Conversions SPD 2023

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
[Reading Borough Council Strategic Flood Risk Assessment](#) (SFRA) by PBA Ref 27560/4002 (June 2017),

Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A pre-submission draft was submitted to the Secretary of State on the 9th of May 2025 and is currently at examination.

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 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’.

6. APPRAISAL

a) Principle of development

The main material consideration in relation to the change of use of the ground floor into C3 residential accommodation relates to the location of the ground floor unit and flood risk.

Flood risk

Paragraph 181 of the NPPF (2024, as amended) seeks that when determining application, LPAs should ensure that flood risk is not increased elsewhere. In addition, development should 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

Policy EN18 of the Reading Borough Local Plan (2019) reiterates national policy and 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, ground water 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.”

The Environment Agency (EA) Standing Advice considers what should be included within a flood risk assessment, and how an LPA should consider flood risk assessments. While the Flood Risk and Coastal Change section of the Planning Practice Guidance (PPG) notes (in paragraph 14) that changes of use are not normally subject to the Sequential or Exception Tests, it also notes that the Local Planning Authority will need to consider what changes of use will be acceptable, and that is likely to depend on whether developments can be designed to be safe and that there is adequate emergency planning provision.

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. As per the Reading Borough Council Strategic Flood Risk Assessment (SFRA), it is considered that the building as developed land is within Flood Zone 3a and the whole of the rear garden is located within flood zone 3b (functional flood plain).

The proposed use constitutes a ‘more vulnerable’ use of the ground floor (building used for dwelling house) as per [Annex 3 \(Flood Risk Vulnerability Classification\)](#) of the NPPF. In addition, as per Table 2 (Flood risk vulnerability and flood zone ‘incompatibility’ – shown below in full and [online](#) within the PPG), normally proposals within sites such as this within Flood Zone 3b (the functional floodplain) would constitute a “development [which] *should not be permitted*”, therefore automatically meaning the development would not engage the Exception Test and should instead simply not be permitted on this basis.

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

Notes to table 2:

- This table does not show the application of the [Sequential Test](#) which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and [Exception Tests](#) do not need to be applied to those developments set out in [National Planning Policy Framework footnote 56](#). The Sequential and Exception Tests should be applied to 'major' and 'non major' development;
- Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

"†" In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

"*" In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

Paragraph: 079 Reference ID: 7-079-20220825

However, consideration is given to the [Reading Borough Council Strategic Flood Risk Assessment](#) (SFRA) by PBA Ref 27560/4002 (June 2017), whereby more detailed guidance in respect of Flood Zone 3b within Reading Borough is given. The relevant extract from section 10.1 is shown below, with this confirming that Flood Zone 3b is delineated into Flood Zone 3b 'Developed' (areas of previously developed land) and Flood Zone 3b 'Functional Floodplain' (areas of existing open space that are subject to flooding). Set within this context, the existing dwelling is considered to be 'previously developed land', within the definition extracted from the NPPF within the SFRA. It is noted that the SFRA dates from 2017 and the NPPF has been updated on a number of occasions subsequent to that. It is confirmed that the definition of 'previously developed land' has not significantly altered in the intervening time. As such, as paragraph 10.1.7 of the SFRA notes, the 'Developed' Flood Zone 3b "are considered equivalent to Flood Zone 3a for planning purposes".

Hence, whilst the site is in Flood Zone 3b, for planning purposes as per the SFRA, the site can be considered as equivalent to Flood Zone 3a.

Vulnerability Classification

The Flood risk assessment submitted states that *'The building is a commercial building at ground floor and residential use above and therefore is considered "more vulnerable" based on the Environment Agency Flood Risk Assessments: Climate Change Allowances Guidance, as the most vulnerable use needs to be considered.'* and *'The proposed conversion to a residential use would remain a "more vulnerable" classification.'*

This assessment of the property does not adequately recognise that the ground floor has been in use as separate planning unit as a 'less vulnerable use (building use as a shop), with a proposed change of use to a 'more vulnerable (residential) use as outlined at <https://www.gov.uk/guidance/national-planning-policy-framework/annex-3-flood-risk-vulnerability-classification><https://www.gov.uk/guidance/national-planning-policy-framework/annex-3-flood-risk-vulnerability-classification>. Notes to Table 2 (Table 2 is illustrated above) state *'Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts*. In this instance, it is imperative to consider each component part of the existing building. The difference in classifications would materially impact the assessment of the proposed change of use.

The EA Flood risk assessment template includes considerations that should be made when assessing the 'Vulnerability classification' which include *'whether the proposal includes sleeping accommodation and on what storey'* and *'If the proposal is for a change of use, you should confirm*

- *the existing and proposed vulnerability classification*
 - *if it will result in an intensification of the use*
 - *if it will affect the vulnerability of users/occupants*
 - *if it will create any self-contained dwellings, for example through the subdivision of a house*
- (https://ecab.planningportal.co.uk/uploads/ea/Environment-Agency_Flood-Risk-Assessment-Template_Guidance.pdf).

Plans submitted do not propose the use of the building to be retained as one planning unit with sleeping accommodation on the upper floors only, in which it case it could be considered appropriate to retain a classification of 'more vulnerable' for the whole building.

In this instance, it is proposed that the existing standalone 'less vulnerable' use of the ground floor with its own access as a Class E shop, only used during daytime working hours, which can be quickly evacuated is proposed to become a 'more vulnerable' C3 use. Residential use of the ground floor would result in an intensification of the use of the site. This is particularly relevant to the proposed creation of a ground floor flat where all residential accommodation is provided on the ground floor level. The vulnerability of Flat 1 users will be increased with the addition of sleeping accommodation at ground floor level with nowhere within the building to evacuate in the event of a flood.

The planning statement refers to an exceptions test. EA standing advice, requires LPA's to assess whether the following have been considered if an exception test is needed, each will be taken in turn:

As per the NPPF(2024), paragraph 176. States *'Applications for some minor development and changes of use⁶² should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote ⁶³*

Footnote ⁶³ states *'A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use. 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'*.

Site Specific flood assessment

The FRA states that *'The existing ground floor is located above the design flood level; therefore, no additional flood resilience measures are required for the ground floor.'* And that the *'The building's ground floor level has been surveyed as 37.97m AOD.'*

The FRA mentions that *'if the private sewer is maintained there is a low risk of sewer flooding'* and that *'it would be reasonable to assume that Thames Water has flood protection measures on their system to reduce the risk of fluvial flooding'*

The information provided in the FRA fails to clearly demonstrate that flood risks have been assessed sufficiently during the course of its lifetime. The maps used within the FRA do not provide an indication of climate changes from 2061 to 2125 or reference updates to flood zones 2 and 3 or the new improved national model.

The flood risk assessment (FRA) has identified that the proposal is at high risk and the EA website <https://check-long-term-flood-risk.service.gov.uk/risk#> confirms that the risk is high for yearly fluvial flooding and high risk of flooding between 2036 and 2069.

The flood risk assessment states in para 4.11 that 'reservoir flooding is extremely unlikely' however, the EA website <https://check-long-term-flood-risk.service.gov.uk/risk#> states there is a risk of flooding from reservoirs in this area.

Floor levels

The flood risk assessment states that *'The building ground floor is located at 37.97m AOD, which is above the 0.1% AEP and the 1%AEP +35% climate change flood level.'*

The Geo26-009 plan submitted shows that the threshold level at the front of 20 Coldicott Street is 37.97 and no levels have been provided to the rear of the property or at the end of the rear access. It is unclear whether the levels would be the same for both Flat 1 and Flat 2 which only has access to the rear of the site. The amended rear access for Flat 2 has been moved from the side of the building to the rear elevation further into the 3b functional flood zone. No separate analysis has been provided for each flat and no section plans have been provided for the existing and proposed ground floor levels at 20 Coldicott Street. Inside the living room of Flat 1 on the ground floor, there was a step height difference in the corner of the front room, and the internal ground floor is not at a consistent level. It is unclear whether the floor level proposed will be acceptable in the longer term.

Reference is provided to a model study 'Thames (Pangbourne to Sonning) 2019' with information taken from 'Reading and Caversham Flood Alleviation Scheme Baseline Modelling Report prepared by Jacobs in May 2021. The flood risk assessment states that the ground floor level is 37.97m AOD and the Design flood level is 37.89m AOD which leaves a 0.08m (80mm difference) for a 1% AEP +31% climate change and a difference of 0.4 for a 0.1% event. No evidence is provided as to why 80mm is considered adequate as a small modelling tolerance. The FRA does not clearly demonstrate how flood risk will remain acceptable over the lifetime of the proposed residential use.

Photo of the internal difference in floor level, step shown by blue arrows in Flat 1 on ground floor.



Resilience measures

The FRA provides details of additional resilience measures, however, the planning statement does not mention which resilience measures will be adopted.

Although additional resilient measures including; electrical equipment to be located a minimum 0.5m above floor level, floor finishes to be flood resilient where practicable and non-return valves on drainage to public sewers, have been provided, no indication is provided as to whether additional measures such as flood gates or walls will be needed for entry and egress particularly in relation to the revised rear access for Flat 2.

Whilst moving to an upper floor may be appropriate for flat 2, given the ease at which the ground floor could be separately let, with no access to the upper floors of flat 2 due to separate entrances, it would not appear possible for future occupants of the ground floor flat to shelter at first floor within the main building however the FRA states that there would be no increase in dependency on the emergency services for rescue at ground floor level.

The provision of a new standalone flat at ground floor level, 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, the entire property could 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.

Residual risk

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.*

With regard to the above bullet points the Applicant's FRA does not cover residual risks and only lists 'How to manage residual risks under paragraph 2.3 under Planning practice guidance. 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 in tandem with the lack of escape routes or on-site refuge there is a 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 in the planning statement that the recommended mitigation measures will be implemented.

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

In terms of safe access and escape routes the FRA states that occupants of the site would be encouraged to sign up for flood alerts, however, there is no mention that occupants should follow safe evacuation routes or have a flood plan in the event that Coldicutt Street is inaccessible to be unable to access Gosbrook Road. Flat 2 would only be able to exit via Mill Road through a 1.8m wooden gate and panel fencing. There is a failure to demonstrate safe access and escape routes.

9520 PL-04.06 Proposed elevations showing the front door and rear patio doors at ground floor level.



1:100

Front Elevation



1:100

Rear Elevation

Date	Rev	Comments	By	Chk

1:100

0 1 2 3 4 5 m

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cabe
Chartered Association
of Building Engineers

RICS

Job Title:
20 Coldcut St Caversham, Reading RG4 8DU, UK

Drawing Title:
Proposed Elevations

Drawing Date: 18-02-2026	Status: Proposed		
Issue Date: 26/02/2026	<table border="1"> <tr> <td>Drawn By: PD</td> <td>Scale: 1:100@A3</td> </tr> </table>	Drawn By: PD	Scale: 1:100@A3
Drawn By: PD	Scale: 1:100@A3		
Job No: 9520	<table border="1"> <tr> <td>Drawing No: 9520 PL-04.06</td> <td>Rev: </td> </tr> </table>	Drawing No: 9520 PL-04.06	Rev:
Drawing No: 9520 PL-04.06	Rev: 		

Exception test – referenced in planning statement

An exception test requires demonstration that:

- development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk; and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

No mention is made in the FRA to wider benefits of the scheme, however, an exception test is referenced in the Planning Statement, which states that the wider benefits would be the reuse of an existing building and delivery of housing in a sustainable location. This is not considered to outweigh the resultant flood risk relating to the proposed change of use of the ground floor.

The EA also requires that ‘all sources of flood risk affecting the proposed development now and throughout its lifetime have been assessed’.

The Planning statement states that the development it is safe for its lifetime as:

- Floor levels exceed flood levels
- No increased flood risk elsewhere
- Safe access and egress retained
- Resilience measures included.

Whilst Table 2 of the Planning Practice Guidance indicates that ‘More Vulnerable’ development within Flood Zone 3a would ordinarily require the Exception Test, paragraph 176 of the NPPF confirms that changes of use are not subject to either the Sequential or Exception Tests. The applicant’s Planning Statement seeks to justify the proposal through the Exception Test, paragraph 176 of the NPPF makes

clear that changes of use are not subject to the Sequential or Exception Tests. Accordingly, no Exception Test is required in this instance. Nevertheless, the information submitted in support of the Exception Test has been reviewed and does not alter the Council's conclusions regarding the suitability of introducing a more vulnerable residential use at this site.

Conclusion – flood risk

It is not considered that the flood risk assessment for this residential development, which is located within Flood Zone 3a and the garden within 3b, has been adequately assessed in relation to potential flood risks or vulnerability classifications to differentiate the level of risk for Flat 1 which is all on the ground floor or for Flat 2 with its revised access and rear entrance. There is, therefore, failure to demonstrate that the proposal would not 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). The proposed development is not, therefore, suitable for the flood zone and, therefore, not considered acceptable in principle.

Loss of a retail unit

Notwithstanding that the overall principle of the use within this flood zone location is not deemed acceptable, with respect to the loss of a retail unit in itself, the principle would be acceptable.

The former butcher was an established small business located within a residential suburban area of Caversham outside of the Caversham local shopping centre. It contributed towards a mix of facilities in the area, but was an anomaly in this predominantly residential street. The loss of the small retail unit, therefore, would be acceptable.

Intensification of use

Policy H8 Residential conversions states *'in the case of conversions of houses to self-contained flats:*

- The property to be converted measures more than 120 square metres gross;*
- At least 25% of the units formed and, where there are 4 or fewer units at least one unit of accommodation, should be suitable for family occupation with a minimum of two bedrooms.'*

The existing building is currently wholly in residential use, and the GIA is 112sqm, which is below that required under Policy H8 and, therefore, it is not of an adequate size.

Notwithstanding that the proposed scheme would not be of sufficient size for conversion overall, it would include a family sized unit of 2 bedrooms.

Although no changes are proposed to the property footprint on the site the proposed intensification of the building into 2 standalone properties is considered to result in an over intensification of the building and convoluted internal design and access that is out of keeping with the overall character of the area.

Principle Conclusion

The overall principle of the use within this location is not acceptable, but for completeness other material matters are addressed below and one of the primary policies is Policy H8 as follows, which includes criteria for assessing if the change of use to self-contained flats is acceptable. The relevant criteria are addressed in the sections below.

Policy H8 states *'Proposals to convert buildings into self-contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing.*

Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:

- *The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;*
- *The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;*
- *There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*
- *There is no inappropriate stacking and location of rooms between units;*
- *Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and*
- *The resulting property or properties would provide adequate internal floorspace and headroom for residents.'*

b) Character and Appearance

In addition to Policy H8 Policy CC7 states that development should '*maintain and enhance the character and appearance of the area in which it is located*' and be in keeping with the urban structure and urban grain. The Local Plan Update Policy CC7 states that development should have a 'coherent identity that suits its context,'

Part 12 of the NPPF 'Achieving well-designed places includes a number of paragraphs around design and fitting with the character of areas. Specifically, Paragraph 135 states:

"Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

Policy H2 states that "*The appropriate density of residential development will be informed by: • the character and mix of uses of the area in which it is located*" and the Berkshire Strategic Market Housing Market Assessment "*identified a particular need within both Reading and the Western Berkshire HMA for family housing of three bedrooms or more*".

Houses along Coldicutt Street are mainly accessed from the frontages along Coldicutt Street and are predominantly single family dwellings.

Previous appearance of 20 Coldicutt Street (May 2019)



The property has historically comprised a retail unit on the ground floor at the front of the building, with a separate ancillary residential accommodation to the rear and on the upper floors. The former ground floor shop frontage was a traditional design that complied with the Reading Design guide for Shopfronts SPD, comprising a large glazed display window, glazed entrance door, fanlight, pilasters, a tiled stallriser, fascia board and a traditional retractable awning, in a blue and white colour scheme. Unauthorised changes have been made to the original shop frontage that result in an appearance that does not reflect either the surrounding residential houses or a traditional shopfront. Only the front canopy and fascia fixings have been retained and at the site visit it was observed that the canopy is in need of refurbishment. No details have been provided in respect of a replacement, refurbishment or removal of the existing structure. The proposed plans fail to preserve the historic character of the former shop unit, are visually incongruous and out of keeping with the character of the Coldicutt Street, provide no frontage boundary treatment or landscaping and fail to preserve the historic character of the ground floor shop unit, resulting in a mix-matched design that is neither a business or residential unit and results in a poor design.

No accommodation at 20 Coldicutt Street has been formally acknowledged under a planning application for the ground floor shop unit at the front of the building or in relation to the separate ancillary residential accommodation. There are also no Certificates for lawful use of the site. A Declaration of Ownership A certificate has been completed on the application form to confirm that all of the land and properties are under the ownership of the applicant. No information is provided in the submission to evidence the length of time that Flat 2 has been used as a separate flat. The application form states that the change of use of flat 1 on the ground floor 1 commenced on 1 February 2020.

Planning permission has not previously been granted to provide a main access from the rear along Mill Road. An established use as a main access from Mill Road to residential accommodation along Coldicutt Street would create a harmful precedent. The urban structure and urban grain of Coldicutt Street is such that the primary access to residential properties is from Coldicutt Street. The rear of these properties on Mill Road comprises garages and parking and there are secondary accesses to the houses only.

Notwithstanding any prior access to Flat 2, which has not been lawfully established, the revised proposed access considered under this current application, via a rear garden fence and rear patio door, is not considered to be a safe and accessible entrance as compared to a formal entrance. Access to the site as a main entrance from Mill Road is not suitable as it results in a dark, recessed access that would have to be used at all times of the day with limited lighting with a detrimental impact on safety and security for residents, contrary to policy CC7 as developments should “*provide safe and accessible environments*”.

It should be noted that there is an adjacent property with a larger footprint at 18 Coldicutt Street, which was converted into 2 standalone flats under application PL/03/0724 on 30/10/2003 under previous local planning policies, and is not considered comparable. In any case each of the flats can be accessed from the side as 18 Coldicutt Street is at the end of the terrace. There is no planning precedent, therefore, to provide access for residential dwellings on Coldicutt Street from the rear at Mill Road. Each application is considered on its own merits.

The proposed block plan does not use all of the land to the rear of the building within the red line. There is an unused space in front of the rear outbuilding that is unused space and has not been incorporated into external garden amenity indicated on the site plan for either of the flat units. The street is characterised

by long rear gardens, however, the subdivision would result in 2 much smaller garden amenity areas measuring 25.6m² for Flat 2 and 16.8m² for flat 1.

The development would result in a one bedroom and two-bedroom flat in an area characterised by three-bedroom family dwellings.

The proposed development does not respect the size and character and appearance of the site frontage, fails to preserve the historic shop frontage and does not reflect the layout of external garden areas in the vicinity and would, therefore, be detrimental to the character and appearance of the site and the wider area. Policies CC7, H2, H8, and H10 of the Reading Borough Local Plan 2019 requires all development to comply with various elements of form, and function relative to the area in which development is proposed.

c) Residential Amenity

In addition to Policy H8 Policy CC8 '*Residential Amenity of the Reading Borough Local Plan 2019 states: "Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties"*'.

Paragraph 135 (f) of the NPPF states: "... f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*"

Policy H5 states: "*New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:*

- a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.*
- b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations⁷⁹.*
- c. All major new-build residential development should be designed to achieve zero carbon homes.*
- d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.*
- e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3)".*

The design does not result in direct overlooking of neighbouring properties however the proposed layout and garden amenity are also material considerations in addition to matters raised regarding character and appearance addressed above.

No daylight and sunlight assessment has been provided to evidence that there would be sufficient provision of daylight and sunlight into each habitable room in Flat 1. There would be a poor outlook from the ground floor bedroom and study overlooking a rear alleyway and boundary fence. The rear bedroom of Flat 1 only has a small high level window which is not considered to provide adequate daylight into the bedroom (as shown in above elevations 9250 PL-04.06 Proposed elevations and 9520PL-04.02 Proposed Ground floor plan floor plans). It is not considered to provide an acceptable standard of residential accommodation Although windows are shown on floor plans to the study and storage cupboard, with a rear side door, no windows or door are shown on the proposed side elevations and inconsistent information has been submitted.

The top drawing is the 'West Side Elevation' of the building. It shows a structure with a gabled roof on the left side, which transitions into a flat roof for the rest of the building. A chimney is visible on the roofline. The building is set on a dark grey base representing the ground. The elevation is labeled '1.190' on the left and 'West Side Elevation' at the bottom.

The bottom drawing is the 'Left Side Elevation' of the building. It shows a similar profile but from the opposite side. It features a gabled roof on the right side and a flat roof on the left. A chimney is also present. The building is set on a dark grey base. The elevation is labeled '1.190' on the left and 'Left Side Elevation' at the bottom.

All dimensions to be checked on site with any discrepancies
 to be reported within 48 hours of completion

Notes:

Order	Item	Comments	No.	Date

0 100 200 300 400 500

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 IN BRITAIN


 RICS

S.S. Title:

© Council of Chartered Accountants, Reading RG2 9BQ, UK

Proposed Side Elevations

Drawing Date	Status	Proposed
18-03-2028	Drawn By	1-1050(AJ)
20/02/2026	PD	1-1050(AJ)

A.S. No.	Drawing No.	Rev
0020	0020 PL-04.07	

It is evident that the subdivision of 20 Coldicutt Street results in clutter at the front of the property as bins are currently stored to the front of the application site for waste collection. The submitted plans show proposed bin storage to the rear, however, the acceptability of such has not yet been demonstrated with

sufficient detail, as referenced below. It is evident that the subdivision of the neighbouring property exacerbates clutter and untidiness on Coldicutt Street with a detrimental impact of such subdivisions as outlined in policy H8 and the Residential Conversions SPD, adopted March 2023.

It is considered that the character and appearance and layout of the proposed change of use and intensification of use and additional residential unit do not provide adequate living accommodation for future residents.

In light of the above numerous individual shortfalls identified, when considered cumulatively, result in an overall conclusion that the quality of accommodation for future occupiers would be contrary to Policies CC8, H5, H8 and H10 of the Reading Borough Local Plan 2019.

d) Transport

Policy TR3 of the Reading Local Plan 2019 states that *“Development will only be permitted where:-*

- i) Accesses and works to the highway comply with the adopted standards of the Transport Authority;*

Given the site is a highly sustainable location, a car free development can be considered in this instance. There are extensive parking restrictions in place in the form of double yellow lines along the frontage of the site, in addition to this the Council's Residential Parking Scheme operates in the area. Future residents of the new unit would not be eligible to apply for a resident or visitor parking permits for roads where the permit scheme operates. Therefore, had the scheme been acceptable overall the appropriate conditions and informative would have been included to ensure that the development would not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area. It does not form a reason for refusal.

Cycle storage has been illustrated within the private amenity area and is deemed acceptable. A condition would have been included had the scheme been considered acceptable overall. This does not form a reason for refusal.

No reference is made to car parking within the planning statement, and no parking places are shown on the existing or proposed plans. At the site visit, the rear of the site was being used for car parking. Transport sought clarification as to whether parking was to be retained at the rear of the site and if so that it would need to be illustrated in relation to the bin storage/collection area from Mill Road. If parking were not to be provided at the rear, then the dropped crossing would need to be realigned and reinstated with the footway, which would need a licence from the Highway Department and to be illustrated on plans. There is a failure to demonstrate that the rear access would function safely for use as a main access point, a designated parking area and bin storage area contrary to policy TR3.

d) Biodiversity and trees

Policy EN12 states *‘On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.*

If the proposed development had been considered acceptable, a small hard and soft landscaping scheme condition would have been recommended to ensure that there would be no net loss in biodiversity and to improve soft landscaping on site in accordance with policies EN12 and EN14. This does not form a reason for refusal.

e) Affordable Housing

Paragraph 34 of the NPPF states that *“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required...”*

Paragraph 64 of the NPPF states that “Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required³⁰, and expect it to be met on-site unless:

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- b) the agreed approach contributes to the objective of creating mixed and balanced communities”.

Policy H3 states that ‘Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading • on sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.’

As outlined within the material submitted with the Local Plan review for the Reading Borough Local Plan 2019, and in accordance with Policy H3, Reading has an acute need for affordable housing and has a long-established policy securing affordable housing on all sites for new housing.

The applicant has duly agreed to contribute toward affordable housing in line with policy requirements. However, no draft agreement, nor valuations for the proposed development have been put forward to support this and determine an appropriate sum. Therefore, a reason for refusal for the failure to contribute toward affordable housing will be included. It is be noted that this could be overcome by the provision of suitable legal agreement in line with s106 of the Town and Country Planning Act 1990.

f) Sustainability

The refurbished stand-alone flats would be required to meet current building regulations and had the scheme been acceptable overall, conditions would have been recommended requiring a higher water efficiency standard to be met in accordance with Policy H5. This does not form a reason for refusal.

g) Other issues

Waste Services

As set out above RBC’s Waste Services queried whether sufficient waste storage could be facilitated and whether the location of the bin storage indicated to the rear, next to parking spaces, would enable unobstructed access to the bin storage. In addition, no details have been provided as to the management of waste storage in terms of bins being presented, adjacent to a highway, for collection. Therefore, it is considered that there is a failure to demonstrate that sufficient waste storage could be provided that it would be appropriately sited within the site and suitably managed for collection, contrary to Policy CC5.

7. CONCLUSION

It is considered that the principle of the use within this location would not be acceptable as there has been a failure to demonstrate that the that the ground floor development would be sufficiently flood resistant and resilient in the longer term and that the proposal would not result in significant harm to life and risks to occupants contrary to policy EN18 of the Reading Local Plan 2019 and the NPPF (2024 as amended). In addition, it is considered that it would represent overdevelopment and over intensification of the property as it would be too small to accommodate two standalone flats, further exemplified by the contrived internal layout.

There would be inadequate amenity for residents due to a lack of daylight, sunlight and outlook, resulting from the contrived and poor layout and there would also be poor functionality of the kitchen of Flat 2 as a result of the internal layout contrary to Policies CC7, CC8, and H8 of the Reading Borough Local Plan 2019.

The resultant subdivision to the rear garden does not respect the character and sizing of other long spacious gardens in the vicinity, and is, therefore, contrary to policies CC7, H8 and H10 of the Reading Borough Local Plan 2019.

It has not been demonstrated that there would be safe and appropriate parking and pedestrian access at the rear of the site, contrary to policy TR3 of the Reading Borough Local Plan 2019.

The proposal seeks to introduce a primary rear access, which is contrary to the established urban grain of the immediate area and this and the overall cumulative impact of the proposed scheme is that there would be a detrimental impact on the character and appearance of the area contrary to Policies CC7 and H8 of the Reading Borough Local Plan 2019.

In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of affordable housing, the proposal is contrary to policy H3 of the Reading Local Plan 2019.

8. RECOMMENDATION

REFUSE Full Planning Permission

Reasons for Refusal:

1. The proposal is for the change of use from a 'less vulnerable' Class E use to a 'more vulnerable' use (residential) within the ground floor of the existing building, which is within Flood Zone 3a, albeit the overall site is situated within Flood Zone 3b (functional floodplain). It is not considered an appropriate flood risk vulnerability classification in this flood risk zone. The submitted Flood Risk Assessment does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. The proposal has not demonstrated that development would be sufficiently flood resistant and resilient in the longer term and/or that residual risks can be managed including safe egress and evacuation routes from both the front and rear of the site or provided individual analysis for each standalone residential flat 1 and flat 2. The development has failed to demonstrate that measures, as outlined within the supporting Flood Risk Assessment, would be adequate or whether the existing and proposed floor levels would cover the entire ground floor within the building. No section plans have been provided to evidence external ground and internal floor levels. The proposal is, therefore, contrary to Policy EN18 (Flooding and Sustainable Drainage Systems) of the Reading Borough Local Plan 2019 and paragraphs 166 -169, 170 - 173 and 176 of the NPPF (2024, as amended February 2025) and 'Table 2: Flood Vulnerability and Flood Zone Incompatibility' Paragraph: 079 Reference ID: 7-079-20220825 of the NPPG.
2. The proposal results in a design that has a detrimental impact on the character of the area as it would result in a visually incongruous frontage, loss of a historic shopfront and a formal recognition of two separate main accesses to the front and rear of the properties on Coldicutt Street and Mill Road. The absence of a formal main entrance for Flat 2, would be out of keeping with the urban structure and urban grain, which includes main entrances along Coldicutt Street and secondary rear accesses from Mill Road. There would also be consequent harm to the character from the intensification of use and subdivided rear gardens, which would not respect the size and character of other long spacious gardens in the vicinity. The revised rear access for flat 2 accessed via a dark passageway in the 3b flood zone would fail to create a safe and accessible environment for residents. As such the proposal is contrary to Policies CC7, CC8, H8 and H10 of the Reading Borough Local Plan (2019) and paragraph 135 of the NPPF (2024, as amended February 2025).
3. The proposed change of use of the ground floor unit formerly in Class E use to C3 residential use results in an overdevelopment of the existing building that is considered too small to

accommodate two separate stand-alone dwellings. The layout of Flat 2 results in conflicts between the main access and functionality of a kitchen on the ground floor, and there would be unacceptable stacking of the bathrooms with the ground floor bathroom and kitchen area under the living room and bedroom of Flat 2. The contrived internal layout, convoluted to fit in two standalone flats into the existing building, results in inadequate amenity for future residents with a failure to demonstrate sufficient access to daylight and sunlight to the rear bedroom of Flat 1, a lack of outlook from the study onto the rear access footpath and boundary fencing and inadequate garden amenity provision as well as inconsistent plans. This is contrary to Policies CC7, CC8, and H10 of the Reading Borough Local Plan 2019, and paragraph 135 of the NPPF (2024, as amended February 2025).

4. The proposal fails to demonstrate that it would provide safe and appropriate parking and pedestrian access arrangements for the rear of the site. This development would adversely affect pedestrian safety. The proposal would, therefore, fail to comply with Reading Borough Local Plan 2019 Policies TR3 (Access, Traffic and Highway-Related Matters) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) and paragraphs 109 and 135 of the NPPF (2024, as amended February 2025).
5. 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, contrary to Policy H3 of the Reading Borough Local Plan 2019 and the Affordable Housing Supplementary Planning Document 2021 and Paragraph 64 of the NPPF (2024, as amended February 2025).
6. The proposal fails to demonstrate, that sufficient internal and external waste storage could be provided, that it would be appropriately sited within the site, and suitably managed for collection. This is contrary to Policy CC5 of the Reading Borough Local Plan 2019, and paragraph 135 of the NPPF (2024, as amended February 2025).

Informatives

1. In reaching its decision, the Local Planning Authority received and assessed the following information submitted:
Planning statement, The Keen Partnership
9520 PL-01 Location Plan
9520 PL-03.01 Existing Ground Plan
9520 PL-03.02 Existing First Floor Plan
9520 PL-03.03 Existing Second Floor Plan
9520 PL-03.05 Existing Elevations
9520 PL-03.06 Existing Side Elevation

9520 PL-02 Existing Block and Proposed Block Plan
9520 PL-04.02 Proposed Ground Plan
9520 PL-04.03 Proposed First Floor Plan
9520 PL-04.04 Proposed Second Floor Plan
9520 PL-04.06 Proposed Elevations
9520 PL-04.05 Proposed Roof Floor Plan
9520 PL-04.01 Proposed Site Plan
TC26002 COL-TCE-XX-XX-RP-C-0001_Flood_Risk_Assessment_P02, March 2026, Taylor consulting

Engineers
Geo26-009 Level survey
CIL
As received 8 April 2026

Affordable housing statement, The Keen Partnership
9520 PL-04.01 Proposed Landscape Site Plan
Landscaping and biodiversity note, The Keen Partnership
As received 20 May 2026

2. The Local Planning Authority has worked positively and proactively with the applicant to see if relevant concerns could be resolved to allow permission to be granted. However, that has not been possible within the prescribed target or agreed extended timescale and therefore the decision to refuse planning permission has been taken.
3. This planning application was submitted without the benefit of first seeking pre-application advice from the Local Planning Authority, which can often result in the avoidance of refusal of planning permission. Please see the following link to the Council's pre-application service here: <https://www.reading.gov.uk/planning-and-building-control/planning-applications/before-making-a-planning-application/pre-application-planning-advice/>