

DELEGATED APPLICATION REPORT

Ward: Battle Ward

App Ref: PL/26/0330 Full planning permission

Address: 90 Stone Street, Reading, RG30 1HU

Proposal: 2 x semi-detached 3-bed dwellings and associated parking, landscaping, boundary treatments, and associated works.

Applicant: Mr Howard Thomas

Received date: 12 March 2026

Target Decision date: 28 July 2026

Case Officer: Anthony Scholes

1. SITE DESCRIPTION

The application site is a broadly triangular plot of 463.23m², which is the extensive side garden associated with no.90 Stone Street. Stone Street contains a mix of semi-detached and terraced properties built circa 1930. The dwellings on the Northern side of Stone Street are set back between 4.6m and 5.2m from the edge of the footway. The area is mixed in terms of how its frontage is laid out. No. 90 is shown as containing carparking/hardstanding over the entire frontage, however, is not served by a dropped kerb. A number of properties along Stone Street have fully covered their frontage in hard surfaces (either gravel, paving, or concrete). Although the set back would not meet the parking dimensions required by current standards (4.8m), it appears that the majority of properties utilise the 4.6m car parking area without overhanging the highway. A number of properties have not taken the approach of laying the entire frontage with hardstanding, and have low boundary walls/fences, including hedging, and in some cases are entirely grassed or vegetated. The properties without hardstanding for the entire frontage appear more visually attractive from the street.

The design of the dwellings on Stone Street are generally simple, with a low eaves height, and a simple arrangement of windows and doors, generally with smaller windows at first floor. Each dwelling is built in red brick, either semi-detached or terraced, and have red tiled roofs.

The dwellings are generally provided with hipped roof front porch areas, either partly, or fully enclosed. The modest 3-bedroom attached dwellings are generally modestly extended, with no.60 and no.90 being the only dwellings part of the attached rows which benefit from a two-storey rear extension. Other than those dwellings which are (as extended) ~10m in depth at two-storeys, the dwellings are all 7m in depth at two-storeys. A number of properties include single-storey rear extensions. All dwellings are provided with generous rear gardens towards Portman Road, with the shortest garden being ~20m in depth. The shortest length of the retained trapezoidal garden for no.90 is ~14.3m (longest length ~20m). The maximum height of each dwelling is 7.33m, with an eaves height of 5.13m. The dwellings contain hipped roofs at the end of each terraced run. The existing dwelling at no.90, has recently been extended with a part two-storey, part single-storey rear extension. One bedroom at first floor includes a side facing window, and is the only window serving that room. A side facing ground floor windows also serves a 'study' room.

The characteristic terraced, and semi-detached dwellings within the area are generally aligned in building line and depth, and include generous rear gardens. The character of the area is therefore quite uniform layout with long rear of gardens.

The application site is not within a conservation area, and does not contain a listed building. To the north, the industrial area is identified as a Core Employment Area (EM2h – Portman Road). The site is part of an identified green link as per Policy EN12 (to the rear). The application site is located partially within Flood Zone 2.



Figure 1 - Site visit photos - 9 June 2026



Figure 2 - EA Flood Map Extract for locality (June 2026)

2. PROPOSAL AND SUPPORTING INFORMATION

The proposed development is for the erection of two (2 no.) semi-detached dwellings. Each dwelling would contain 3-bedrooms. Each dwelling includes a covered front porch area, and enclose front facing window under the same roof. Above ground floor, the proposal includes two front-facing windows in similar proportions to the window below. The proposed roof is dual-pitched with gable end side walls and is a maximum height of 7.7m which is demonstrably higher and bulkier compared to the adjacent terrace. The proposal would be built in red brick, with roof tiles, and uPVC windows, all are stated to match the existing (presumed to be the neighbouring building).

The proposal seeks the erection of a pair of semi-detached dwellings on the site. The dwellings would be set back from the road frontage and positioned generally in line with the pattern of development in the surrounding area. Each dwelling would be served by off-street parking to the front and private amenity space to the side and rear.

The front gardens would be predominantly hard surfaced to accommodate parking, with soft landscaping and boundary treatments proposed around the site. The submitted plans indicate low-level fencing and hedging to define boundaries and provide screening.

It is acknowledged that an unauthorised boundary fence has recently been erected along parts of the site's frontage. The current proposal includes an alternative boundary treatment comprising lower

fencing and landscaping. The unauthorised fence remains a separate matter and may be subject to enforcement action where considered expedient.



Figure 3 - Proposed Plans



Proposed Street View Elevation - Front

Figure 4 - Proposed Streetscene plan

The following plans and documents were submitted with the application:

Application Forms

CIL forms

Drawing No: HB_001 – Location Plan

Drawing No: HB_002 – Existing Site Plan

Drawing No: HB_003 – Existing Floor Plans and Elevations

Drawing No: HB_004 – Proposed Site Plan

Drawing No: HB_005 – Proposed New Build Plans and EL 90A

Drawing No: HB_006 – Flood Risk Assessment

Drawing No: HB_007 – Proposed Views

Drawing No: EX25/371/10 – 201 – Rev P3 – Proposed Drainage Layout (For New Build)

Drawing No: EX25/371/10 – 203 – Rev P4 – Proposed Drainage Layout (for Existing Build)

Drawing No: EX25/371/10 – 205 – Rev P2 – Proposed Access Design Layout

The 'Haus Frame', Flood Risk Assessment, dated 2 March 2026

The 'Haus Frame', Design and Access Statement, dated 6 March 2026

The 'Land Science', Combined Phase I and Phase II Geotechnical Assessment, dated 9 January 2026

The 'John Wenman Ecological Consultancy', Biodiversity Net Gain Assessment (Ref: R3059_BNG_a DRAFT), dated March 2026

The 'John Wenman Ecological Consultancy', Preliminary Ecological Appraisal (Ref: R3059_PEA_a DRAFT), dated March 2026

As received by the Local Planning Authority 12 March 2026

The 'John Wenman Ecological Consultancy', The Statutory Biodiversity Metric' tool, dated 2 March 2026

As received by the Local Planning Authority 24 April 2026

Drawing No: READ2501 – Site Survey, dated 21 October 2025

Drawing No: HB_001 – Location Plan

Drawing No: HB_002 – Existing Site Plan

Drawing No: HB_003 – Existing Floor Plans and Elevations

Drawing No: HB_004 – Proposed Site Plan

Drawing No: HB_005 – Proposed New Build Plans and EL 90A

Drawing No: HB_006 – Flood Risk Assessment

Drawing No: HB_007 – Proposed Views

Drawing No: HB_012 – Proposed Street View Elevations

The 'Evans Rivers and Coastal', Flood Risk Assessment (Ref: 4149/RE/05-26/01), dated May 2026

As received by the Local Planning Authority 19 May 2026

Affordable Housing Letter, dated 29 May 2026

Estate Agent Valuation E-mails, dated 27 May 2026

As received by the Local Planning Authority 2 June 2026

3. RELEVANT PLANNING HISTORY

PL/98/0486 (HOU) (98/00121/FUL) - Two storey side extension. Approved 8 April 1998
(Unimplemented)

PL/99/2470 (FUL) (99/01188/FUL) - Erection of 2 x 2 Bedroom Flats. Refused 8 March 2000

PL/00/0046 (FUL) (00/01074/FUL) - Erection of 2 x 2 bedroom flats with associated parking. Refused 19 March 2001

PL/01/1011 (FUL) (01/00972/FUL) - Erection of 2 x 2 bedroom semi detached houses. Refused 19 September 2001

PL/02/0654 (FUL) (02/01188/FUL) - Two pitched roof semi-detached houses on land adjacent to 90 Stone Street. Approved 18 December 2002. Lapsed, unimplemented.

Officer Note: The Applicant has purported by e-mail that the above scheme (PL/02/0654) was implemented, by the digging of foundations. There is no apparent evidence on site of foundations that have been begun. In addition, this permission included 20 planning conditions, including various 'pre-commencement' conditions which required separate approval from the LPA. No contact between the applicant and the LPA appears to have been undertaken to discharge any. Given the significant time that has passed since the application would have lapsed, it is also possible that any works commenced may have occurred outside of the 3-year period for the development to be begun. No certificate of lawfulness has been pursued to demonstrate lawful implementation of this permission. Accordingly, at this point in time and on the evidence available to the LPA, the position is that this planning permission has not been implemented.

PL/25/1460 (HOU) - Proposed part single-storey and part two-storey rear extension. Approved 4 March 2026. Implemented (it is noted that the bricks and roof materials used do not appear to 'match' as per condition 3).

4. CONSULTATIONS

The following consultation responses were received:

- Environment Agency (EA)

We have no comments to make in respect of the proposed development. This consultation is inappropriate, and we did not need to be consulted because: National FRSA should have been applied.

Officer note: The case officer sought clarification from the EA via e-mail on 21 July 2026, regarding which flood model was the most up to date for the Reading area. A response was received on 22 July 2026, stating that:

"The Jacobs (2021) Reading and Caversham Flood Alleviation Scheme Baseline Modelling, is the Thames (Pangbourne to Sonning) 2019 model. They have different names but are essentially the same model. We can confirm that this is the model you should be using for this area."

- RBC's Retained Ecologist

The site is located on a green link as per policy EN12, it is 150m from a tree lined railway corridor providing optimal commuting and foraging habitat for bats. The ecological report (John Wenman Ecological Consultancy, March 2026, ref: R3059_PEA_a DRAFT) is considered to be undertaken to an appropriate standard, and states that the site is not suitable for bats, badgers, or other protected species. The report includes a number of precautionary measures to be adopted during development. Subject to the implementation of these measures, the risk of adversely impacting protected species is considered to be minimal. These measures should be secured through a planning condition.

From 2024, it is a legal requirement under the Environment Act 2021 that all developments (unless exempt) must demonstrate a net gain of at least 10%. The application site has regrettably been cleared prior to works commencing. Nevertheless, the BNG calculation has been correctly undertaken using the baseline habitat assessment carried out before clearance when the site comprised a mix of scrub and grassland habitats. A completed BNG metric has been submitted together with an accompanying report (John Wenman Ecological Consultancy, March 2026, ref: R3059_BNG_a DRAFT) which indicates that the development will lead to a net loss of -0.33 Area Habitat Units (equivalent to a loss of -90.73%). A total of 0.37 AHU will be needed to meet the statutory 10% uplift in BNG.

- RBC Transport Development Control Officer

Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. The site is located in Zone 3, Secondary Core Area, of the Revised Parking Standards and Design SPD. In line with the adopted parking standards, two parking spaces are required per 3 bedroom dwelling. The plans illustrate that each dwelling will be provided two parking spaces which complies with the Council's standards.

The submitted site plan indicates that two new dropped vehicular crossings are proposed to serve the parking layout. However, an existing speed hump on Stone Street conflicts with the location of one of the proposed crossings. To facilitate the development, the speed hump will need to be relocated.

The applicant is therefore requested to submit a revised site plan showing the proposed relocation of the speed hump. The required highway alterations shall be secured through the planning process and delivered under an appropriate Highway Works Agreement with the Highway Authority.

In accordance with the Borough's Parking Standards and Design SPD, a minimum provision of 2 cycle storage spaces should be provided per dwelling. Cycle storage in the form of a secure shed within the garden of each dwelling would be acceptable but further details are required by condition.

The applicant is requested to provide details of the proposed bin storage arrangements. These should demonstrate that on-street servicing can be accommodated and that bins will not obstruct the adjacent footway when presented for collection, thereby ensuring safe and unobstructed pedestrian access.

The Council's Local Plan was adopted in November 2019 and this includes a requirement at Policy TR5 for each new house to be provided with an electric charging point. This is to be secured by condition.

A construction method statement would be required and secured by condition.

- RBC - Planning Natural Environment

The site of 90 Stone Street is in an AQMA and on a treed corridor (Oxford Rd & Portman Rd). The proposed plan does not indicate or demonstrate space for meaningful planting on the perimeter, particularly the proximity of the north corner of the proposal to Portman Road is so tight, there are gaps in the indicative hedging, which in itself would not be enough - tree planting would be expected. I would say that the development fails to demonstrate sufficient tree planting given its location within an Air Quality Management Area and on a treed corridor hence is contrary to EN14 and to Objective 4 of Reading Borough Council Tree Strategy (2021).

- Lead Local Flood Authority (Reading Borough Council) (LLFA)

The proposal is just for 2 dwellings and currently the LLFA only need to be consulted on major planning applications the LLFA are therefore limited in what comments they can make regarding this proposal.

It is noted that the drainage layout reduces run off onto the public Highway and includes the provision of on site soakaways for both properties. As such the LLFA have no objections to the proposal.

Two site notices were placed around the application site, one on each highway frontage. No comments were received by members of the public.



Figure 5 - Site Notice Photos

5. EQUALITY ACT

When determining an application for planning permission the Council is required to have regard to its obligations under the Equality Act 2010. There is no indication or evidence (including from consultation on the application) that the protected groups as identified by the Act have or will have different needs, experiences, issues and priorities in relation to this 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 proposed development.

6. 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) which states at Paragraph 11 "Plans and decisions should apply a presumption in favour of sustainable development".

In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given). National Planning Policy Framework (December 2024, as amended).

Accordingly, the latest NPPF and the following development plan policies and supplementary planning guidance are relevant:

The following chapters are the most relevant (others apply to a lesser extent):

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 5 – Delivering a sufficient supply of homes

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

National Planning Practice Guidance (2014 onwards)
Guidance - Flood risk and coastal change – 17 September 2025

Reading Borough Local Plan 2019 - Policies:

CC1: Presumption in favour of sustainable development
CC2: Sustainable design and construction
CC3: Adaptation to climate change
CC5: Waste minimisation and storage
CC6: Accessibility and the intensity of development
CC7: Design and the public realm
CC8: Safeguarding amenity
CC9: Securing infrastructure
EN9: Provision of open space
EN12: Biodiversity and the green network
EN14: Trees, hedges and woodland
EN16: Pollution and water resources
EN18: Flooding and Drainage
H1: Provision of housing
H2: Density and mix
H3: Affordable housing
H5: Standards for new housing
H10: Private and communal outdoor space
H11: Development of private residential gardens
TR1: Achieving the transport strategy
TR3: Access, traffic and highway-related matters
TR5: Car and cycle parking and electric vehicle charging

Supplementary Planning Documents:

Affordable Housing SPD (2021)
Planning Obligations Under s106 SPD (2015)
Revised Parking Standards and Design (2011)
Sustainable Design and Construction (2019)

Other relevant guidance/documentation:

Reading Biodiversity Action Plan (2021)
Reading Housing Needs Assessment 2024
Reading Borough Council Tree Strategy (2021)
The Building Regulations 2010, 'Access to and use of buildings' approved document M (Volume 1: dwellings)
Environment Agency - National flood risk standing advice for local planning authorities, 28 May 2026 (as updated)
The Reading Level 1 Strategic Flood Risk Assessment, November 2024
Reading Transport Strategy 2040 (June 2024)
Reading Transport Strategy 2036: Sub-Strategy Local Cycling & Walking Infrastructure Plan 2020-30 (2020)
Reading Borough Council Vehicle Crossing Policy

Local Plan Partial Update

Local Plan (2019), the emerging Local Plan (Submission Draft 2025)

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. The submission draft of the Local Plan Partial Update was submitted on 9th May 2025 and examined earlier this year. At the time of writing, the examination-in-public of the partial update to the local plan is in the process of taking place. Stage 1 hearings were held virtually on 11th and 12th November 2025. Stage 2 hearings took place in February 2026.

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 these applications listed above is that, other than Policy H1 (Provision of Housing) they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’. Policy H1 is out of date because the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in National Planning Practice Guidance (NPPG) (as required now Policy H1 is out of date) or for the provision of Affordable Housing.

At this time, the examination of the Local Plan Partial Update has not reached a significantly advanced stage, and therefore, the Local Plan Partial Update can be afforded very limited weight in the determination of this application.

It is noted that paragraph 11 of the NPPF states:

- “d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.”*

Paragraph 11 is often called ‘the tilted balance’. Footnote 7 referenced in i. above, includes, areas at risk of flooding or coastal change. Footnote 9 with regard to policies which must be given weight in determining adverse impacts refers to paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.

Footnote 8 states: This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232.

Policy H1 of the Reading Borough Local Plan 2019 is over 5 years old, and the Council is unable to demonstrate a 5 year housing supply, currently demonstrating 3.55 years. As policy H1 is out of date, and in accordance with footnote 8, given the LPA is unable to identify a five year supply of deliverable housing sites, the tilted balance is engaged.

7. APPRAISAL

Existing Use of the Land

The site had, for some time, become overgrown with vegetation; however, it has recently been cleared. In correspondence dated 16 July 2026, the applicant states that "substantial works were undertaken under the previous permission". Notwithstanding this, the submitted application documents, including the original Description of Development and Design and Access Statement, indicate that the previous planning permission has lapsed.

The applicant further contends that the 2002 planning permission established the principle of development on the site. Whilst this position is noted, the previous permission is no longer extant and therefore carries limited weight in the assessment of the current proposal.

The principal planning considerations are addressed below. It is also noted that, since the grant of the 2002 permission, there have been significant changes to national and local planning policy and guidance. Accordingly, the current application has been assessed against the adopted Local Plan, the National Planning Policy Framework, and other relevant planning guidance currently in force.

Notwithstanding the conflicting accounts of the status of the 2002 permission, no information has been provided, such as a certificate of lawfulness (CLE) to confirm that the development was lawfully implemented. Accordingly, the previous permission, as it has lapsed, and has not been proven through a formal CLE to have been implemented. For the purposes of this assessment, the lawful use of the site is considered to remain as garden associated with no.90 Stone Street.

Principle of Development

The NPPF (2024, as amended) states that LPAs should "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". The NPPF definition of 'previously developed land' excludes: "*... land in built-up areas such as residential gardens ...*". As such, it is clear that the application site is not the priority for development, and the redevelopment of the site would not attract the substantial weight associated with re-use of 'brownfield land'.

Notwithstanding, in pure land use terms, the proposal would contribute to the provision of housing in accordance with Policy H1 (Provision of Housing), providing the criteria outlined in Policies H11 and H2 (relating to general location, accessibility, density and housing mix matters) are met as well as other material planning considerations such as matters relating to design, residential amenity, transport and landscaping.

Flood Risk

Policy EN18 seeks to direct developments to the area of least risk of flooding, and seeks to ensure the sequential and exemption test (as applicable) are met. It also seeks that developments must consider the impacts of flooding over the lifetime of the development from all sources. Development within flood zones should not reduce the capacity of the flood plain to store flood water, impede the flow of floodwater, or in any way increase the risks to life and property arising from flooding. It also seeks that development, wherever possible, seek to reduce flood risk on and offsite. Finally, the policy also encourages SuDS within smaller schemes.

The NPPF 2024 (as amended) paragraph 125 seeks effective use of land, whilst recognising some undeveloped land may provide function such as flood risk mitigation. Paragraph 170 seeks to avoid inappropriate development in areas at risk of flooding, and where necessary make safe development for

its lifetime without increasing flood risk elsewhere. Paragraph 172 seeks to follow a sequential approach to development management. Paragraph 177 discusses the exemption test as relevant. Paragraph 181 also seeks that, when determining applications, LPAs should ensure that flood risk is not increased elsewhere.

Sequential and exemption tests

The application site is located within flood zone 2 as per the June 2026 extract from the EA flood map (above). The proposal is 'non-major development' as per the development class definitions within the EA guidance. The sequential test, as per the EA guidance, is required for 'non-major development'. The sequential test seeks to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk (023 Reference ID: 7-023-20220825).

It is noted that the current application was submitted without a flood risk assessment, this was not requested as a validation requirement when the application initially was made invalid on 30 March 2026. Following queries from the Applicant, a response from the case officer was provided on 24 April, with the case officer advising that a flood risk assessment would be required for validation purposes, including reminding the applicant that a sequential/exemption test may also need to be demonstrated.

It is noted that paragraph 175 of the NPPF states:

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

It is noted that the PPG states (027 Reference ID: 7-027-20220825):

In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.

It is noted that the absence of a 5-year housing land supply is not a relevant consideration in applying the sequential test for individual applications. However, housing considerations, including housing land supply, may be relevant in the planning balance, alongside the outcome of the sequential test.

A flood risk assessment (FRA) was provided on 19 May 2026. This FRA does not consider the sequential test, or provide commentary on the above guidance, or NPPF paragraph(s). Based on the information provided within the flood risk assessment, the proposal's footprint appears to be located within the 1 in 1000 year plus climate change allowance flood zone (although the data underpinning the assessment is not considered correct).

As such, it is considered that the proposal has not shown that the above is met, the applicant has failed to demonstrate that flood risk elsewhere would not be increased, given the footprint (including potential land raising associated with the outdoor paving) is within an area at risk of flooding now or in the future, contrary to the guidance within (027 Reference ID: 7-027-20220825). Therefore, the sequential test is considered to be required for the development. No information on the sequential test has been provided, and therefore, the proposal has failed to demonstrate that there would be no sequentially preferable sites at a lesser risk of flooding within the borough, contrary to Policy EN18, and the NPPF 2024 (as amended).

EA standing advice

The Environment Agency Guidance relating to flood risk is also addressed below. The advice provides a framework and list of items to check to consider flood risk appropriately.

“FRAs should appraise the suitability of the flood risk datasets it has used. This should take account of:

- when the dataset was produced*
- why the dataset was produced*
- the limitations of the dataset*

The data set used for the FRA appears to be the 2019 model for the Thames (Sonning to Hurley). It is noted that Hurley is to the east of Sonning, whereas the application site (and Reading) is to the west of Sonning. It would appear that the more appropriate dataset to use for the FRA would be the Thames (Pangbourne to Sonning) model. In support of the Local Plan Partial Update, Reading Borough Council's consultant used what appears to be the latest Strategic Flood Risk Assessment for the Thames (Pangbourne to Sonning (2021)) (The Reading Level 1 Strategic Flood Risk Assessment, November 2024). As confirmed by the EA on 22 July, the Pangbourne to Sonning model (2019) is effectively the model used within the SFRA, and is the appropriate model to be used for the area of the application site.

As such, the applicant's submitted FRA utilises data which is not intended to cover the area of the proposal, it would appear that the dataset used to inform the FRA is not the most appropriate, and therefore the FRA cannot be relied upon for accuracy.

Given the data used to inform the FRA appears to relate to an incorrect model for the area, the remainder of matters, whether fully addressed or not, would not be considered to be suitable in any event. Notwithstanding, the EA advice is addressed in turn for completeness.

FRAs should contain the information set out in the [site-specific flood risk assessment check-list](#). Applicants can increase the chances of including the right information in their FRA by using the Environment Agency's [FRA template and guidance](#).

When reviewing FRAs, you should check whether:

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

The FRA would appear to consider the risk of groundwater flooding, and states a low risk of groundwater flooding. No information to the contrary is available, and the conclusions appear reasonable.

The applicant has provided an extract showing the likely impact of surface water flooding, including an allowance for climate change. It shows that there would be a medium risk of surface water flooding when considering climate change. The FRA does state that there are no localised low areas, or depressions on the site. This appears inaccurate, and water was found pooling on the application site during the case officer's site visit. As such, the risk of surface water flooding appears to be insufficient, or inaccurate.



Figure 6 - Water pooling during site visit

With regard to flood risk, and climate change allowance, given the FRA does not utilise the correct flood model for the area, it does not appear to consider the mapped flood risk scenario plus climate change as shown below (2070-2125). Given the lifetime of the development is likely to exceed 50 years, this scenario should be considered. This scenario shows a significant increase in flood risk over the site, which has not been considered. As such, the risk of fluvial flooding, plus climate change does not appear to have been sufficiently considered within the FRA.

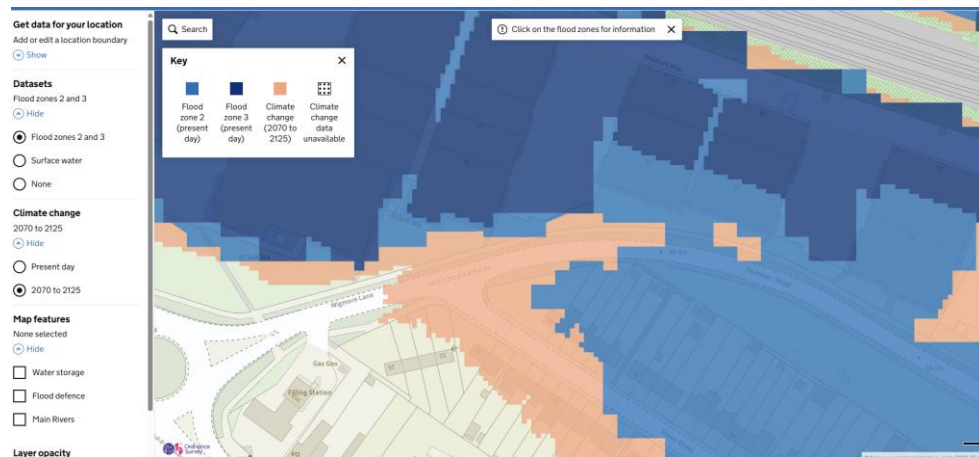


Figure 7 - EA Flood Map with Climate Change 2070-2125 shown (extract 20/7/26)

- the [development type is incompatible](#) with the proposed location

The development is classified as 'more vulnerable' as per annex 3: Flood risk vulnerability classification of NPPF December 2024, as amended. The site is located within Flood Zone 2. Table 2 of the EA guidance outlines the acceptability of development within flood zones. As below, table 2 does not expressly state that 'development should not be permitted' for the category proposed within flood zone 2.

Table 2 does not override the requirements of a sequential test outlined above, and though the development could be permitted, the sequential test has not been addressed, or passed, and therefore, the development has not been demonstrated as being suitable for the location.

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

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

The flood levels identified, are not considered to be accurate, and therefore, no certainty around measures that will make the development safe can be properly considered. The proposal suggests that the floor level of the development would be 75cm above the modelled flood event. If accurate, this would be suitable to make the development safe, however, the correct model, and the correct climate change allowance model should be considered. It has not been demonstrate that the development would be safe throughout its lifetime.

- *the proposed development will be appropriately flood resistant and resilient*

As above, if the development is built above the flood level, subject to suitable sub-terranean measures of flood protection, the development may be appropriately flood resistant and resilient. No such information on such measures have been provided. It has not been demonstrate that the development would be appropriately flood resistant and resilient.

- *the proposed development will increase flood risk elsewhere and, if so, that appropriate mitigation has been included*

The FRA presented shows that the footprint would be built within flood zone 2, and the modelled flood area. This would likely result in flood risk elsewhere being increased. It has not been demonstrated that the development would not increase flood risk elsewhere, or if mitigation could suitable be included.

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

The areas of flood zone 2 on the application site include the footprint of most of one dwelling, including by fluvial and surface water flooding. It is not clear, due to inadequate information, whether there would be areas on the site at a lower area of flood risk that could accommodate the proposal.

- *any residual risks can be safely managed*

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.*
- *safe access and escape routes are included where appropriate, as part of an agreed [emergency plan](#)*
- *the proposed development incorporates SuDS*

The submitted FRA does not consider any residual risk. Therefore, it has not been demonstrated that any residual risks would be managed safely.

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

The FRA notes that the flood areas do not extend to the south of the application site, and that flood levels are lower than the internal ground floor area. As such, escape routes in this scenario would be outside of flooded areas.

However, no consideration appears to be given to the 2070 to 2125 climate change flood scenario, which would increase flooding beyond the site boundary, and result in emergency escape routes through flooding. As such, it has not been adequately demonstrated that all flood risk scenarios and safe egress from have been demonstrated.

- *the proposed development incorporates SuDS*

The proposed development incorporates SuDS provision for each new dwelling. Each dwelling is provided with a soakaway within the garden areas. The SuDS also includes a channel drain which captures rainwater from the hardstanding to the frontage as to not induce flows onto the highway.

It is noted that the SuDS scheme could be further improved through integration of SuDS with soft landscaping in accordance with up to date SuDS guidance. Though, further details could be secured by condition should permission have been given. It is noted that the SuDS plan is inconsistent with the proposal plan, as it omits the boundary hedging between the dwellings as proposed.

Conclusion

Overall, the Flood Risk Assessment (FRA) has been completed to an inadequate standard. The FRA fails to identify that the sequential test is required, and does not undertake a sequential test. The FRA is based on an incorrect model, and uses an EA model for a different area to the application site, the Thames (Pangbourne to Sonning) model is confirmed by the EA as the appropriate model for the area. Thereafter, though a number of matters may be reasonably addressed, they are likely to be flawed through the use of inappropriate data to underpin the findings, therefore the FRA as a whole cannot be relied upon for accuracy.

The proposal would fail to demonstrate that the development is appropriate for the location with regard to flood risk, and fails to demonstrate that there are no sequentially preferable sites for the development. In addition, due to the technical failings of the submitted flood risk assessment, the applicant has failed to demonstrate that the risks of flooding on the application site, and increase of flooding on neighbouring sites has been appropriately managed, or avoided. It is therefore in conflict with Policy EN18 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development to be directed to areas at lowest risk of flooding in the first instance, and not reduce the capacity of flood plain storage, or impeded the flow of floodwater or in any way increase the risks to life and property, nor does it reduce flood risk on and off site. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks to direct development away from areas at highest risk of flooding, following a sequential approach, and ensure flood risks are not increased elsewhere. The NPPF further expects risks to future occupiers to be appropriately identified, and where appropriate, managed for the lifetime of the development.

Design Considerations

Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. Among other things, CC7 seeks a high quality development that has regard to the prevailing layout and urban grain, landscape, scale: height and massing; and architectural detailing and materials. All development is assessed to ensure they respond positively to their local context, and are visually attractive as a result of good high quality built form and spaces.

Policy H11 (Development of Private Residential Gardens) seeks to ensure that development of private residential gardens for residential use will only be acceptable where, the proposal makes a positive contribution in terms of (among other things): relationship to existing built form and spaces around building within the surrounding area, a layout which integrates with the surrounding area, including built up plot coverage of plots, building line(s), rhythm of plot frontages, parking areas, and existing pattern of opening and boundary treatments on the site frontage; provision of appropriate hard and soft landscaping (particularly at site frontages); compatibility with the general building height within the surrounding area; materials and elevational detail; the arrangement of architectural features. Policy H10, goes on to describe a number of other criteria, including appropriate access, a design and layout that minimises the exposure of existing private boundaries to public areas, and avoids the need for additional physical security measures; the need to ensure no significant detrimental impact on the amenity of adjacent and nearby occupant; an emphasis on the provision of family sized housing.

Paragraph 129 of the NPPF (2024, as amended) seeks to ensure that developments take into account the importance of securing well-designed, attractive and healthy places. Paragraph 135 seeks that decision ensure that development will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and effective landscaping, and create places that are safe, inclusive and promote health and wellbeing, and where crime and disorder and fear of crime do not undermine quality of life. Paragraph 139 of the NPPF (2024, as amended) states that development that is not well designed should be refused.

As outlined above, and not substantially repeated here, Stone Street (in the vicinity of the site) is characterised by a strong building line of terraced dwellings, in a consistent form, with a generally consistent depth (at two-storeys), height and roof shape (including materials). The frontages of the sites are generally open, with low level fencing, and whilst a number include significant hardstanding, many include greenery and landscaping. The rear of properties in the street have long rear gardens often with substantial landscaping, and mature trees. A number of properties include ground floor rear extensions, only two properties include two-storey rear extensions. All properties retain significant garden spaces.

With respect to the siting and layout of the proposal, the setting back of the building line predominantly seeks to ensure that space is afforded for the provision of the carparking associated with the proposal. The extent of the proposal, and its plot coverage attempts to be a similar depth to the neighbouring two-storey rear extension at no.90 Stone Street. However, the urban grain of the area is one of a more spacious arrangement of relatively restrained built form (containing reasonably sized 3-bedroom dwellings), with a clear and consistent building line, where parking spaces intermittently take up plot frontages. In combination, the setting back of the building line, and maximisation of the footprint of an extensive two-storey pair of dwellings, are cramped within the site and introduce a significant portion of built form in very close proximity of the tapering rear boundary/highway.

In addition, the proposal includes an inconsistent arrangement of key architectural features. The northern side of Stone Street includes centrally located doorways, with windows at ground floor toward the outside walls of the dwellings. The proposed windows at ground floor are generally larger, with the proportions of openings above ground floor reduced. As above, the ground floor is arranged with an extensive single-storey front projection. This is a feature of the neighbouring terraces, however in the form proposed is in significant excess of neighbouring properties. Overall, the architectural detailing takes little notice of the quite uniform design of properties on the southern side of Stone Street, and provides an excessively scaled building, with larger architectural features.

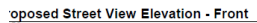


Figure 8 - Proposed Streetscene plan

Limited details have been provided regarding the materials proposed. The neighbouring site (90 Stone Street) within the ownership of the applicant, has recently had a part two-storey, part single storey extension constructed. Whilst the extension was granted (PL/25/1460) that approval required matching materials. At the site visit, it was noted that the bricks used, and the roof materials used do not match the original building. This may be subject of separate investigation by RBC's planning enforcement team, and expediency of action is reserved as appropriate. Notwithstanding, the materials used in the neighbouring extension highlight the importance of ensuring materiality is appropriate for new

developments within an established context. Had approval been recommended, it would be necessary to ensure high quality and contextually appropriate materials were used, including provision of samples of materials to be secured by condition.

Overall, the proposal includes a layout which fails to integrate with the surrounding grain and context of the area. The building steps backward from a consistent building line to over fill the frontage with carparking and hardstanding, with minimal (if any practical) soft landscaping, nor does the proposal provide appropriate tree planting along the rear boundary. The proposal does not reflect the existing relationship between built form and spaces around building, providing a significant depth of development relative to the individual plots. Comparatively, a large proportion of the site will actually be covered by development, and that is not reflective of the very uniform pattern of development in Stone Street. The rhythm of the frontage and openings is disjointed from the neighbouring dwellings, with an oversized covered area to the front (at single storey). The proposal, through an overly bulky roof form, with uncharacteristic gables, results in a taller overall roof form exacerbating the lack of conformity with the prevailing character of hipped roof forms. The proposal does not provide sufficient space for a reasonable setting around the building, to the rear and sides, where sufficient landscaping and amenity space can be provided (discussed further below). It would therefore conflict with Policy CC7, and H11 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development proposals to be of a high quality the maintains and enhances the character and appearance of the area, and make a positive contribution to the character of the area providing sufficient space to accommodate open space, and landscaping as well as setting around buildings. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks high quality, beautiful and sustainable buildings and places.

Residential Amenity

Policy CC8 of the Reading Borough Local Plan 2019 seeks to protect existing residential properties from impacts on amenity, and also seeks to provide a high level of amenity for future residents, with regard to:

- *Privacy and overlooking;*
- *Access to sunlight and daylight;*
- *Visual dominance and overbearing effects of a development;*
- *Harm to outlook;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell;*
- *Crime and safety; or*
- *Wind, where the proposals involve new development of more than 8 storeys.*

Due to the location of the site, to the west and north of adjoining properties, the impacts on existing residents would appear to be limited to an effect upon no.90, the dwelling within the ownership of the applicant. Notwithstanding the ownership status, it would not negate the need to ensure the existing property is sufficiently protected from harm.

As noted above, no.90 has recently benefited from a part single-storey, part two-storey rear extension. The extension is at the full width of the original dwelling. As a result of the width of the extension at first floor, the dwelling required a side facing window to the first floor bedroom, which faces directly onto the application site. A condition attached to the permission for the extension (PL/25/1460) requires this window to be glazed with clear glass. At ground floor, no.90 contains a side facing window, which appears to serve a 'study', although, this window was not shown on the previous approved plans under PL/25/1460. Both windows would face the proposed development.

The proposal would be located 2m away from these side facing windows, both of which would provide the only daylight/sunlight and outlook for each room they serve. Each window would also look onto a tall gable end wall, and face directly onto the tallest part of the flank wall of the proposal. The proposed development would clearly and substantially impact the daylight/sunlight achieved by these windows, it would also significantly impact the outlook achieved from both windows, and present an overbearing built form in close proximity to these side facing windows.

The proposal would cause a detrimental impact on the living environment on the existing residential property in terms of access to daylight/sunlight, outlook and overbearing impacts. It would therefore conflict with Policies CC8 and H11 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development proposals to not cause a detrimental impact on the living environment of existing residential properties in terms of outlook, access to daylight/sunlight and overbearing impacts. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks a high standard of amenity for existing and future users.

Policy H10 seeks to ensure that dwellings are provided with functional private open space, including green space that allows for sitting out areas, children's play, home food production, green waste composting, refuse storage, general outdoors storage and drying space. Policy H10 also aims that outdoor areas will respect the size and character of similar spaces in the vicinity.

The proposed development would provide a rear garden for the eastern dwelling, measuring approximately 80m², with a trapezoidal shape. The western dwelling would be provided with a ~28m² triangular shaped rear garden, and an awkwardly shaped side garden of ~100m².

A low post and rail fence and hedge would form the boundary treatment with Wigmore Lane along the rear/western boundary of the application site. As a result, the gardens would be highly visible from the public highway and road noise/poor air quality. This exposure would significantly diminish the level of privacy available to the space, thereby limiting its appeal and reducing its effectiveness as usable private amenity space for the occupiers of the property. It is likely occupiers of the western dwelling would seek to utilise the rear of the garden to obtain privacy. . In addition, the small area, in a triangular shape would limit the uses capable of being achieved within this space.

The proposal would fail to provide acceptable living conditions for future occupants, with regard to the size and shape outside private amenity space, which would be heavily overlooked. It would therefore conflict with Policies CC8 and H10 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development proposals to not cause a detrimental impact on the living environment for new residential properties in terms of privacy and overlooking, and the provision of a functional private open space. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks a high standard of living conditions for future occupiers.

Policies H5 (Standards for New Housing) set out the standard to which all new build housing should be built. In particular, new housing should adhere to national prescribed space standards (NDSS). Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space. In addition, policy H5 requires all new development to be built to meet the optional requirements of M4(2) of the Building Regulations. The optional requirements would only apply under the building regulations if required by planning condition

The proposed development includes the provision of two dwellings, each with 3-bedrooms indicated on the floor plans. The NDSS requires a bedroom, for a single bed space, to be 7.5m², and 11.5m² for a double bedroom. In addition, the requirements of M4(2) include the provision of a clear space around beds to be 750mm, and provide for 1 double bedroom. The requirements of M4(2) also seek to ensure that bathrooms have sufficient room around sinks and showers. The optional standards require dwellings

to be adaptable, which does not appear to prejudice internal stairs, given they could be provided with powered chair lifts.

Each dwelling would be 106m², exceeding the NDSS space requirements for 3-bed dwellings over two-storeys. However, the proposal includes three bedrooms within each dwelling, two with double beds shown, at 11m² and 10m² respectively, and one at 9m² for the left hand dwelling, and one at 6m² for the right hand dwelling. Overall, the proposal has not been designed to comply with either the NDSS, or the optional standards of M4(2) accessible and adaptable dwellings in accordance with Policy H5. The proposal would provide substandard bedrooms, which are not sufficient for the expected occupancy levels, the 6m² bedroom, would also be entirely unsuitable as sleeping accommodation.

The proposal would fail to provide acceptable living conditions for future occupants resulting in cramped living environments within bedrooms, and would fail to provide accessible and adaptable dwellings. It would therefore conflict with Policy H5 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development proposals to be built to an appropriate standard (unless it can clearly be demonstrated that the development would be unviable), and provide accessible and adaptable dwellings for future occupants. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks a high standard of living conditions for future occupiers.

Biodiversity and Landscaping

Policy EN12 requires all development protect the identified green network, including green links and that all development should not result in a net loss of biodiversity. The site adjoins a designated 'Green Link' to the north as identified on the Proposals Maps. In particular, and in exceptional circumstances, where the need for development clearly outweighs the need to protect the value of the site, this Policy does allow the on-site loss of biodiversity where this meets a hierarchy for managing biodiversity impacts. Accordingly, schemes need to demonstrate that such impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is "no net loss" of biodiversity.



Figure 9 – Designated Green Link Map Extract (application site roughly identified in red line area)

The NPPF (December 2024) (paragraph 187) seeks to ensure decisions enhance the natural environment by protecting and enhancing sites of biodiversity value, minimise impacts on and providing a net gain for biodiversity, and ensure (paragraph 193) that development adequately mitigate harm to biodiversity.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). All developments, except those which meet an exemption, are required to result in a 10% biodiversity net gain.

The application site is the garden land associated with no.90 Stone Street. The Green Link along the rear boundary within the application site has been degraded over time, including the clearing of the entirety of the site, and removal of trees which formed part of the linking canopy between Wigmore Lane/Portman Road and the wider Green Link as shown above. It is noted that the topographical plan submitted with the application shows a number of tree stumps within the rear garden. A single tree is shown within the rear garden of no.90 Stone Street, and is retained. The site has further been cleared of all vegetation on multiple occasions. It appears the garden area has been re-cleared during construction of the extensions to no.90, where a large amount of building waste is now stored, which is unsightly. An unauthorised boundary fence has also been erected along Wigmore Lane. No trees would be impacted by the proposal, given the regrettable pre-clearing of potentially high amenity value trees on the site.

The applicant has adequately presented the pre-clearing biodiversity value of the site, which enables a calculation of biodiversity net gain to be undertaken. The proposal would result in a -90.73% loss of biodiversity on-site. This would result the requirement of a net gain equivalent to 0.37 area habitat unit to be provided.

Whilst the site has been pre-emptively cleared of all vegetation, the baseline for the assessment is considered to be the pre-clearing value of the site, in line with national guidance. The site forms part of a designated green link, which may have provided habitat for foraging bats. It is acknowledged that the post-cleared site, as assessed for value to protected species. The 'bare-ground' is not considered to be a habitat suitable for foraging, or passing creatures. As such, the development of the site would not result in any further impacts on protected species. Biodiversity enhancements, such as integrated bird and bat features, mammal gaps, and wildlife friendly landscaping would be required had permission been given.

However, the applicant has not demonstrated that the net loss is suitable. It is clear, as outlined above, that the proposal represents the overdevelopment of the plot that fails to provide sufficient space around the building for all requirements. The clearing of the entire site is unlikely to have been necessary, and the loss of all vegetation on site could have been avoided. The proposal has failed to consider reducing the harm to on-site biodiversity value in the first instance. Without this being fully demonstrated, the applicant has not completely followed the hierarchy of actions and as such, off-site compensation is not accepted.

The proposal would fail to avoid harm to biodiversity value in the first instance, and has failed to demonstrate the exceptional circumstance which would allow a -90.73% biodiversity net loss on site, resulting in harm to local biodiversity value, and severing of the green link contrary to policy EN12 of the Reading Borough Local Plan 2019. It would therefore conflict with Policy EN12 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development should not result in a net loss of biodiversity. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks to protect and enhance sites of biodiversity value, minimise impacts on and provide a net gain in biodiversity. The proposal does not appear to have addressed or satisfied the trading rules under the mandatory biodiversity net gain requirements.

Trees and Landscaping

Policy EN14 seeks that individual trees and groups of tree and woodland should be protected from damage and that new development should make provision for tree planting within the application site to improve tree coverage within the Borough. Policy CC7 also seeks that developments respond to the local context, and provide a high quality design, inclusive of landscaping. The Reading Tree Strategy

seeks to improve canopy cover within all Local Wards to 25% by 2030. The application site, located within Battle Ward, is within the lowest canopy cover ward in the Borough, with 6.7% canopy cover.

Paragraphs 135, and 136 of the NPPF (December 2024) seek to ensure a high quality of design to create attractive places which include landscaping.

The proposal seeks to construct the two dwellings within close proximity of the boundaries, particularly up to 0.88m from Wigmore Lane. The rear gardens are proposed to be enclosed by a 1m tall boundary fence along the road frontage. A row of hedging is shown along the Wigmore Lane frontage, however this run is broken by the building footprint which extends within 0.88m of Wigmore Lane, including paved areas.

With regard to the landscaping proposals, the Applicant seeks to partially re-provide a green link, however the location of the development, in close proximity to Wigmore Lane, breaks what could otherwise be a continuous landscaping proposal. There is also a small hedge shown between the parking areas of the proposal plans (albeit inconsistently across the various plans). There is no tree planting clearing included within the proposal, given the green link, and the identification as a low tree canopy ward, and proximity to a reasonably busy road (Wigmore Lane/Portman Road), it would be expected that tree planting be included within the proposal, though some could be included, the significant plot coverage, and proximity to boundaries would limit meaningful landscaping within the scheme.

The proposal would fail to provide a layout which includes sufficient space for meaningful landscaping, and extend canopy cover within the borough contrary to policy EN14 of the Reading Borough Local Plan 2019, and the Reading Tree Strategy 2021. It would therefore conflict with Policy EN14 of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development to make provision for tree planting within applications sites. It would also be contrary to the National Planning Policy Framework (the Framework) which seeks to ensure developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

Affordable Housing

The proposal seeks to create 2 additional dwellings. In line with Policy H3, applications for 1-4 residential dwellings shall provide 10% of the Gross Development Value (GDV) in the form of affordable housing contribution toward off-site provision elsewhere in the Borough.

The Applicant has stated that they would be willing to enter into an agreement for the provision of a policy compliant affordable housing contribution. The applicant has provided two valuations, each concluding the GDV of the proposal is £850,000. The applicant has provided the other relevant information to meet the local validation requirements (title plan, solicitors details etc.) The agreement to contribute is also acknowledged, and welcomed, and an appropriate contribution secured by a suitably worded agreement pursuant to s106 of the Town and Country Planning Act would ensure the development complies with Policy H3. Advice has been sought from RBC's valuers, to confirm that the valuations are accurate.

However, as refusal has been recommended, no agreement or discussions around an agreed figure has been pursued, and no legal agreement discussions have progressed. Should the Applicant seek an appeal, it is recommended that early engagement with the LPA is undertaken on the terms of any legal agreement. As it stands, failure to secure a legal agreement pursuant to s106 of the Town and Country Planning Act (1990, as amended) forms a reason for refusal.

Highways

Policies TR1, TR3, and TR5 seek to ensure that developments are appropriately provided with parking (including EV charging), highway access, cycle storage. Development should contribute appropriately to meeting the most up-to-date Local Transport Plan. Access to all developments should be safe, and comply with the appropriate highways standards. Where new build dwellings provide off-street parking, EV charging points must be provided. The Reading Transport Strategy 2040 (2024) generally seeks to encourage a more sustainable transport network, with a lower reliance on private vehicle transport for all users.

The Revised Parking Standards SPD (2011) sets out the expected level of parking for developments based on their accessibility. The application site is designated as being within 'Zone 3' as per the SPD. For three-bedroom dwellings, parking of two vehicles would be expected for each dwelling. The SPD also states that two secure, covered, lockable cycle spaces should be provided for each three-bed dwelling. However, parking levels should reflect the accessibility of the area. Since the 2011 SPD, there have been further improvements and additional provision of bus services within the locality of the application site. The no.16, 17, and 18 buses now all serve the application site, with a bus stop for the 18 ~50m from the application site. This provides infrequent services into the Town Centre, whereas the high frequency 16 and 17 buses provide very frequent serviced in and out Reading with stops in each direction ~200m from the site. Oxford Road is also a 'Strategic' cycle corridor as identified within the Local Cycle and Walking Infrastructure Plan (LWCIP), with Portman Road/Wigmore Lane shown as a 'Local' cycle corridor. Therefore, the site is also well served by identified cycle routes, which may be improved in the future.

The proposal would appear to be over a location that has historically been used as access to the rear of, and parking for no. 90 Stone Street. However, there is no dropped kerb serving no.90 itself. It is understood that a separate license from highways has been sought for a new access to 90 Stone Street. The proposal would result in the loss of parking for no.90 Stone Street.

It is noted that the proposal includes two parking spaces in front of each dwelling. There is no cycle parking indicated on the proposal plans. The proposal provides access to the rear of each dwelling via a 1m wide path in the case of the right hand dwelling. There would be sufficient space on site for the provision of two cycle storage spaces within the site, and this could form a condition should approval be recommended.

The provision of carparking on the site, results in a frontage that is dominated by hardstanding. While compliant with parking standards, the extent of hardstanding contributes to an unacceptable appearance and overdevelopment of the frontage.

Whilst not a planning matter specifically, the proposal requires two new dropped kerbs serving the development. Given Stone Street is not a classified road, access to a highway is permitted development. However, this would still be subject to separate consent by the Highways Authority. RBC's Transport Development Control Officers have noted that access would likely require the relocation of the speed hump within Stone Street. The new accesses would require separate approval by RBC, including relocation of the speed hump, or other street furniture as required (i.e. light column(s) /telecommunications column(s)).

Conditions would be required if approval was given to secure: a construction method statement, provision of electric vehicle charging points (at least 1 per dwelling), access construction, provision of cycle parking, and provision of waste storage (at a minimum).

At current, the proposal would not conflict with policies TR1, TR3, and TR5, subject to of the Reading Borough Local Plan adopted November 2019 (the Local Plan) which require development proposals to be built to an appropriate standard (unless it can clearly be demonstrated that the development would be

unviable). It would also be contrary to the National Planning Policy Framework (the Framework) which seeks a high standard of living conditions for future occupiers.

Other Matters

Mix of Units

The proposed development seeks to provide two new dwellings. However, having regard to the size of the bedrooms and the requirements of the Nationally Described Space Standards, the dwellings are more appropriately considered to comprise one two-bedroom dwelling and one three-bedroom dwelling. The proposal fails to comply with the internal space standards, including the requirement to provide a double bedroom of at least 11.5m², and has not demonstrated compliance with the optional M4(2) accessible and adaptable dwelling standards.

Policy H11 identifies family-sized housing as the preferred form of development on private garden land. Whilst three-bedroom dwellings are generally favoured, two-bedroom dwellings are also capable of meeting family housing needs. Furthermore, Policy H2 and the Reading Housing Needs Assessment (2024) identify an ongoing need for larger two and three-bedroom homes within the borough. As such, the provision of family-sized housing in the form of one two-bedroom and one three-bedroom dwelling would be acceptable in principle on this site.

Nevertheless, it is noted that the overall floorspace proposed could accommodate two policy-compliant three-bedroom dwellings through relatively modest alterations to the internal layout.

Waste Storage

Each dwelling would be required to have space for one of each bin: general waste, recycling, glass recycling, food waste, and soft plastic recycling. Collection would occur from Stone Street. It would appear there is sufficient space for the storage, collection, and manoeuvring of bins for collection by future residents. A condition could be attached to any permission to secure this.

CIL

Should approval have been recommendation, the application would have been CIL liable. There is no 'existing floor area' for CIL purposes. It is noted that the Applicant's CIL form inaccurately quotes the proposal CIL chargeable floor area as 150m², the chargeable floor area is approximately 220m². An approximate CIL calculation shows a liability of £41,148.59 as calculated based on the current chargeable amount.

Sustainability

Policy H5 requires all new development to meet the improved water efficiency standards under Regulation 36(3) of the Building Regulations. Should permission have been given, a condition could have been attached to secure this.

Title Plan

Is it noted that the supplied title plan (to meet validation requirements related to any s106 agreement) includes a restrictive covenant on the land to the benefit of the Council. This is acknowledged; however, the existence of any covenant would not be a material planning consideration and would be a private matter between the landowner and the Council's Assets Team, who have been reminded of the existence of the covenant

8. CONCLUSION

The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The Council accepts that it is currently unable to demonstrate a five-year supply of

deliverable housing sites (with 3.55 years currently identified), including the appropriate buffer. Consequently, by virtue of paragraph 11(d) and footnote 8 of the NPPF, the presumption in favour of sustainable development is engaged and the so-called "tilted balance" applies.

The proposal would deliver two additional dwellings within the urban area of Reading and would make a modest contribution towards housing supply at a time when the Council cannot demonstrate a five-year housing land supply. Moderate weight is therefore afforded to the provision of additional housing. The proposal would also generate short-term economic benefits through construction activity and longer-term expenditure by future occupants within the local economy. In addition, the proposal would contribute in line with policy to affordable housing. These benefits attract moderate weight in favour of the development.

Notwithstanding these benefits, the proposal gives rise to a number of significant concerns which weigh heavily against the grant of planning permission.

Footnote 7 referenced in i. above, includes 'areas at risk of flooding'. The proposed development as it relates to flood risk has, through failure to produce an adequate flood risk assessment (FRA), failed to demonstrate flood risk matters. Through the incorrect flood model data backing the FRA, the proposal fails to demonstrate that the sequential test is not required, or that it is passed. In addition, through the use of the incorrect flood model data, the findings of the FRA are unreliable. Overall, the FRA fails to demonstrate a number of matters, and would represent a significant risk, and harm to future occupants, and neighbouring occupiers who may be subject to additional off-site flooding as a result of the proposal. These negative impacts are considered to provide a strong reason for refusing the development proposal in line with the provisions of the tilted balance.

Footnote 9 states the policies which are relevant to the tilted balance assessment (paragraphs 66, 84, 91, 110, 115, 129, 135, and 139). Paragraph 66 relates to major development, and is not therefore relevant. Paragraphs 84, and 91 are not relevant to the proposal.

In addition, paragraph 110 seeks to manage patterns of growth and focus development on public transport corridors. In this regard, Reading is well served by a comprehensive bus network, and the area of the application site is serviced by multiple routes in close walking distance.

Paragraph 115 relates to sustainable transport and seeks that development provide safe and suitable access for all users. Paragraph 129 seeks efficient use of land, but underscores the importance of securing well-designed, attractive, and health places. Paragraph 135 seeks that developments function well over the lifetime of the development, are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping, and create places which are safe, inclusive and accessible. Paragraph 139 states that *"Development that is not well designed should be refused ..."*

As such, the various significant shortfalls of the scheme, in providing a cramped layout dominated by hardstanding and failing to give sufficient space for soft landscaping, and resultant biodiversity net loss, and incomplete provision of a Green Link. As well as the significant impact upon existing residents of no.90 by impacts upon daylight/sunlight, outlook, and overbearing; and the failure to provide appropriate outdoor amenity space, and a cramped internal layout which is not designed to NDSS, or to meet M4(2) of the Building Regulations results in harm to the provision of accessible and adaptable dwellings, and a sufficiently high quality of internal design. All are considered matters within local policy which reflect and align with the matters mentioned within footnote 7 and 9. As such, it is considered that the adverse impacts of approving the development would significantly and demonstrably outweigh the benefits of the scheme. Therefore, the proposal is recommended for refusal.

9. RECOMMENDATION

Refuse permission for the following reasons: