

## COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 4 March 2020

**Ward:** Caversham

**App No.:** 190980/OUT

**Address:** 2 and 4 Send Road, Caversham, Reading

**Proposal:** Outline application for demolition of 2 & 4 Send Road. New development comprising of 14 x 1 bed flats and 2 x 2 bed flats. Access proposed from Send Road & Forge Close

**Applicant:** Abodi Investments Ltd

**Determination Date:** Originally 2/11/2019; EOT agreed until 6/3/2020

### RECOMMENDATION:

REFUSE outline planning permission for the following reasons:

1. The application has failed to demonstrate that the proposal provides wider sustainability benefits to pass the Exceptions Test as required given its location within Flood Zone 3A. As such the proposal is contrary to Policy EN18 of the Reading Borough Local Plan 2019.
2. The submitted Flood Risk Assessment fails to demonstrate that the risks posed to groundwater from potentially contaminated land as a result of the development can be satisfactorily managed. As such the proposal is contrary to Policy EN18 of the Reading Borough Local Plan 2019.
3. The amount of development proposed within the main body of the site would require a scale of building (or buildings) that would appear as an incongruous, jarring and poorly integrated feature within the context of the notably modest scale of development in adjacent streets. The minimal distance that would be likely to exist between the building(s) and east and west site boundaries would result in an overly cramped appearance, further adding to the visual harm. For these reasons the development would represent an overdevelopment of the site, fail to respond positively to its local context, and fail to reinforce local character and distinctiveness. The proposal would therefore harm the character and appearance of the area and is contrary to Policies CS7 and H11 of the Reading Borough Local Plan 2019.
4. The proposed development, due to its scale, mass, height and location would be detrimental to the setting of nearby listed building 'Ivy House' and as such the proposal is contrary to Policy EN1 of the Reading Borough Local Plan 2019.
5. The application fails to demonstrate that the amount of development can be accommodated without harm to the amenity of occupiers of neighbouring properties caused by loss of privacy to gardens and windows due to overlooking resulting from the likely scale of the building and proximity and number of balconies proposed. As such the proposal is contrary to Policy CC8 of the Reading Borough Local Plan 2019.
6. The application fails to demonstrate that the amount of development can be accommodated without harm to the amenity of occupiers of neighbouring properties caused by overbearing and visually dominant effects resulting from the likely scale and position of the proposed building. As such the proposal is contrary to Policy CC8 of the Reading Borough Local Plan 2019.

7. The application fails to demonstrate that the proposed amount of development can be accommodated in a manner which provides adequate outlook, daylight, sunlight and private outdoor amenity space for future occupiers. As such the proposal would be harmful to the amenity of future occupiers, contrary to Policies CC8 and H10 of the Reading Borough Local Plan 2019.

8. The application fails to demonstrate that an appropriate mix of units (incorporating 3 bed units) can be accommodated within the development and therefore the proposal does not produce a suitable mix of dwellings. As such the proposal is contrary to Policy H2 of the Reading Borough Local Plan 2019.

9. The application fails to demonstrate that it can achieve Zero Carbon status and the proposal would therefore fail to demonstrate that it would maximise benefits with respect to tackling climate change. As such the proposals are contrary to Policies CC2 and H5 of the Reading Borough Local Plan 2019.

10. Due to the footprint and layout of the building and the proportion of hard-surfacing to soft landscaping proposed, the development makes insufficient provision and opportunities for tree planting within the application site to improve the level of tree coverage within the Borough and to maintain and enhance the character and appearance of the area. As such the proposal is contrary to Policies CC7 and EN14 of the Reading Borough Local Plan 2019 and the Reading Tree Strategy.

11. Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, the Local Planning Authority are unable to consider whether either of the proposed vehicular accesses would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies TR1 and TR3 of the Reading Borough Local Plan 2019.

12. The applicant has failed to submit sufficient information for the Council to determine whether or not bats (a protected species and therefore a material planning consideration) will be adversely affected by the proposed development. As such this proposal is considered to be contrary to Policy EN12 (Biodiversity and Geology) of the Reading Borough Local Plan 2019.

13. In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough and the objective of creating mixed and balanced communities and as such is contrary to Policy H3 of the Reading Borough Local Plan 2019, Affordable Housing Supplementary Planning Document (2013) and para. 50 of the NPPF.

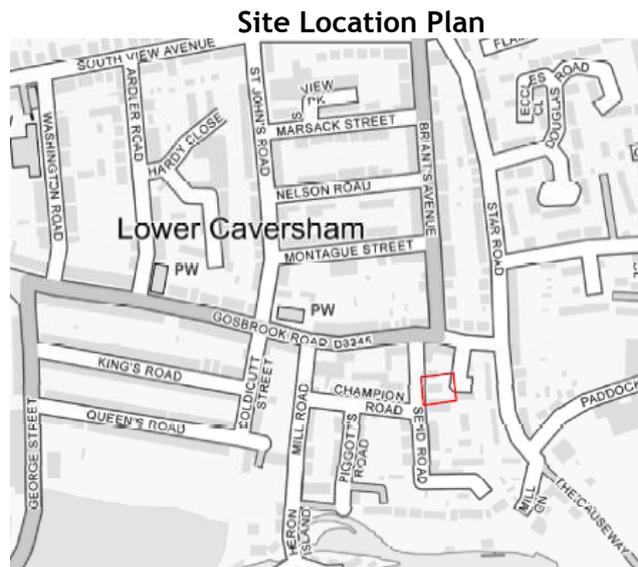
14. In the absence of a completed legal agreement to secure an acceptable mitigation plan or equivalent contribution towards the provision of Employment, Skills and Training for the construction phase of the development, the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socioeconomic harm, contrary to Policy CC9 and the Employment Skills and Training SPD (2013).

#### Informatives

1. Positive and Proactive Approach
2. Refused Drawings

## 1. INTRODUCTION

- 1.1 The application site comprises No's 2 and 4 Send Road, located on the east side of Send Road. No.2 Send Road is a detached residential bungalow and No.4 Send Road a single storey light industrial unit.
- 1.2 The surrounding area contains a mix of residential and commercial/industrial properties. No.393 Gosbrook Road (Ivy House), located to the north east of the site, is a listed building.
- 1.3 The site is located within Flood Zones 2 and 3 as designated by the Environment Agency and is within an Air Quality Management Area.
- 1.4 The proposals are being considered at Planning Applications Committee by virtue of it falling within the 'Major' applications category. The site in relation to the wider area is shown below.



## 2. PROPOSAL

- 2.1 Outline Planning Permission is sought for up to 16 dwellings.
- 2.2 'Landscaping' is reserved for future consideration. The applicant has submitted a set of indicative drawings showing how the proposed 16 dwellings might be accommodated within the site. The drawings indicate one 'H' shaped building of two and half/three storeys.
- 2.3 Access is proposed for consideration at Outline stage (the current application) and is shown as being achieved through Send Road and Forge Close. 16 vehicle parking spaces are proposed. Indicative landscaping is proposed, as is bin storage.

### Drawings

SK3 Rev B Proposed Development

SK3 Rev B Site Plan

Indicative Street Views

Indicative Proposed Aerial Views North and South

Indicative Proposed Aerial Views East and West

Received 19<sup>th</sup> June 2019

## 3. PLANNING HISTORY

- 3.1 190233 Outline application for demolition of 2 and 4 Send Road. New development comprising of 14 x 1 bed flats and 2 x 2 bed flats. Access proposed from Send Road and Forge Close. Withdrawn
- 3.2 No site specific pre-application advice has been sought prior to the submission of this application.

## 4. CONSULTATIONS

### Internal

- 4.1 RBC Ecologist - OBJECT. Discussed below.
- 4.2 RBC Heritage Officer- OBJECT. Discussed below.
- 4.3 RBC Natural Environment Officer - OBJECT. Discussed below.
- 4.4 RBC Environmental Protection Officer - OBJECT. Discussed below
- 4.5 RBC Transport Officer - OBJECT. Discussed below

### Public

16 letters of objection received, concerned with:

- Height (too high)
- Density (too many flats)
- Inconsistencies/errors with submission
- Lack of concern for the environment
- Lack of private and communal outdoors space
- Overdevelopment/cramped
- Impact on listed building
- Loss of light/overshadowing
- Overbearing/visual dominance
- Loss of privacy
- Noise
- Parking/access/traffic
- Flood risk/groundwater pollution
- Loss of bungalows
- Lack of green space/tree planting
- Impact on air quality

## 5. RELEVANT PLANNING POLICY AND GUIDANCE

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.
- 5.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 5.3 Reading Borough Local Plan 2019:

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design and Construction

CC3: Adaptation to Climate Change  
CC5: Waste Minimisation and Storage  
CC6: Accessibility and the Intensity of Development  
CC7: Design and the Public Realm  
CC8: Safeguarding Amenity  
CC9: Securing Infrastructure  
EN1: Protection and Enhancement of the Historic Environment  
EN10: Access to Open Space  
EN12: Biodiversity and the Green Network  
EN14: Trees, Hedges and Woodland  
EN15: Air Quality  
EN16: Pollution and Water Resources  
EN18: Flooding and Drainage  
EM3: Loss of Employment Land  
H1: Provision of Housing  
H2: Density and Mix  
H3: Affordable Housing  
H5: Standards for New Housing  
H10: Private and Communal Outdoor Space  
TR1: Achieving the Transport Strategy  
TR3: Access, Traffic and Highway-Related Matters  
TR5: Car and Cycle Parking and Electric Vehicle Charging

Relevant Supplementary Planning Documents (SPD) are:  
Affordable Housing (2013)  
Revised Parking Standards and Design (2011)  
Planning Obligations Under Section 106 (2015)  
Sustainable Design and Construction (2019)  
Employment, Skills and Training (April 2013)  
Reading Borough Council Tree Strategy

## 6. APPRAISAL

The main issues to be considered are:

- Principle of Development
- Flood Risk and SuDs
- Scale, Appearance, Design and Effect on Heritage Assets
- Amenity for Nearby Occupiers
- Quality of Accommodation for Future Occupiers
- Mix of units
- Transport
- Landscape/Trees
- Ecology
- Sustainability
- Affordable Housing
- Other Matters - Sustainability, S106 Legal Agreement and CIL
- Equalities impact

### Principle of Development

- 6.1 The proposals include the demolition of a light industrial building. The site is not located within a designated core employment area and therefore there is no in principle objection to the loss of this building. Moreover, the site is predominantly surrounded by residential dwellings and therefore loss of this use is likely to be beneficial to the amenity of existing nearby occupiers in terms of removal of a source of potential noise and disturbance.

- 6.2 Neither the bungalow or industrial unit are of any particular architectural merit to warrant retention in themselves. Nevertheless, their diminutive scale means they appear unobtrusive within the street scene, with space about the buildings so as not to appear cramped within their setting. Within this context, there is no in principle objection to the existing bungalow and industrial building being demolished in design terms, but the replacement building must be appropriate in all other aspects (which is detailed further below).
- 6.3 Therefore, whilst it is considered that a proposal to introduce 16 residential units would broadly comply with the principles of Policy H1 by contributing to meeting the housing needs within the Borough, the remainder of this appraisal shall demonstrate why the principle for the development as proposed for this site is not acceptable when considered against other relevant Policies.

#### Flood Risk and SuDS

- 6.4 The site is located within Flood Zone 3a and the NPPF (2019) defines residential dwellings as a 'more vulnerable' development in terms of flood risk. Furthermore, the commercial use element is classified as 'less vulnerable' and therefore the proposal would result in a development of a higher flood risk vulnerability classification. As the site falls within Flood Zone 3a, the Sequential Test and Exception Tests are required. In addition, Policy EN18 (Flooding and Drainage) sets out that planning permission will not be granted for development that would increase risks arising from flooding.
- 6.5 The Sequential Test assesses other potential sites in the Borough with the aim of steering new development to areas at the lowest probability of flooding (Zone 1). If the applicant can demonstrate through the sequential process that a site with a lower probability of flood risk is not reasonably available a case can be put forward as to why the development could be considered as an exception. For the Exception Test to be passed (NPPF para 102) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere.
- 6.6 The NPPG on Flood Risk and Coastal Change provides further detail on the Sequential Test. Paragraph 33 requires the area to which to apply the Sequential Test should be defined by local circumstances and relate to the catchment for the type of development proposed. Also, when applying the Sequential Test, the guidance states that "...a pragmatic approach on the availability of alternatives should be taken".
- 6.7 The Council's latest 'Housing and Economic Land Availability Assessment' (May 2017) notes that, 'there are not sufficient sites to meet the objectively assessed need for housing in Reading on sites in Flood Zones 1 and 2'. The onus is on the applicant to present a detailed sequential test for any development (where applicable) and demonstrate the case to the local planning authority. The sequential test area would include land within the whole of the Borough.
- 6.8 It is for the Local Planning Authority to assess whether the Sequential Test has been passed and to be satisfied that the proposed development would be safe and would not lead to increased flooding elsewhere (to be addressed through a Site Specific Flood Risk Assessment).
- 6.9 The submitted Sequential Test identifies that a search for sites has been undertaken across the whole of Reading Borough area selecting reasonably

comparable sites (in terms of size/availability/planning history/ownership and any other known development constraints). The submitted Sequential Test identifies that there are no sequentially preferable sites and officers consider that the assessment has been undertaken in accordance with nationally policy and guidance requirements.

- 6.10 Notwithstanding the above, for the Exception test to be passed it must:
- Demonstrate that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
  - A Site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing floor risk elsewhere, and, where possible, reduce flood risk over all.
- 6.11 In respect of the first point above, it is not considered that the submission demonstrates that the site provides wider sustainability benefits to pass the Exceptions Test. The submission comments that the delivery of 16 residential units represents a wider sustainability benefit. However, in light of the issues raised and discussed in this report, the shortfalls of the scheme are not considered to be outweighed by the provision of housing that is otherwise considered unacceptable.
- 6.12 In respect of the second point above, whilst a Flood Risk Assessment has been submitted, the Environment Agency have raised an objection, and consider that, as detailed above, the risks to ground water from the development are unacceptable. Given the above, there is an in principle objection to the proposed development which is considered contrary to Policy EN18.
- 6.13 A sustainable drainage strategy (SuDs) has also been submitted as part of the application. This has been reviewed by the Local Flood Authority (RBC Transport) and is considered acceptable subject to conditions to secure a timetable for its implementation and details of management and maintenance of the scheme and its implementation in accordance with the approved details.

#### Scale, Appearance, Design and Effect on Heritage Assets

- 6.14 Policy CC7 aims to preserve or enhance the character of the area in which a development is in terms of layout, landscape, density, scale, height, massing, architectural detail and materials. Policy EN1 seeks to preserve or enhance the historic character and setting of heritage assets.
- 6.15 It is acknowledged that Send Road at this point has no definitive character; the area contains a variety of dwellings types and forms, including some commercial properties. It is also acknowledged that the bungalows in themselves are of no particular architectural merit. Nevertheless, they are of a diminutive scale and unobtrusive within the street scene. Furthermore, they contribute to the spacious character of this part of Send Road; certainly for the plots around the bungalows. They are also two of a short run of similar dwellings facing Send Road, which form a distinctive group. The combination of their (lack of) height, spacing, and deep rear gardens, combined with soft landscaping, contributes, cumulatively, to the spacious character of the road at this point.
- 6.16 In contrast, the sheer scale of the scheme would be markedly at odds with this immediate context. The proposals would give rise to a disparity in plot size between the existing and proposed development, with the proposed occupying nearly the entire width of the site at around three storey. The proposed built form would effectively fill the site almost to its margin such that it would appear cramped and overdeveloped, resulting in a considerably constrained form of

development.

- 6.17 In terms of scale and detailed design, the proposed building is in complete contrast to the adjacent buildings. The need for an 'h' shaped building, with large crown roof and elongated side, has a minimal, if not opposite effect, in achieving a reduction in the bulk of the building. The proposed development would appear overly large compared to the neighbouring bungalows and properties along this part of Send Road, generally due to the bulky roof form, prominent gables and overall width at nearly three storey. In combination, the scale and elongated side elevations would mean that the bulk and overall mass of the proposal would introduce an unduly visually dominant building within the Send Road and Forge Close street scenes. Furthermore, the lack of transition in height and separation distance between the proposed building and the neighbouring properties would be limited and would not be adequate to ensure that the building integrates in the local context.
- 6.18 Whilst the proposed materials are not known, it is not considered that satisfactory materials would be sufficient to create a visually interesting building or to mitigate the shortcomings of the architecture.
- 6.19 It is not clear where the design cues have been taken from, as the building would not appear to complement the locality, with uncharacteristic features such as the under-crofts. The resulting substantial building would be in stark contrast to the existing character, with the combination of the increased height, plot coverage and overall bulk resulting in an overly dominant and overdeveloped appearance. A substantial amount of development to both the front and rear and side boundaries and what remains of the exterior provision would be dominated by hardstanding (hard-surfaced parking bays and bin provision). Furthermore, whilst indicative landscaping is shown, and whilst acknowledging that landscaping is a future consideration, given its location under the under-crofts, the site's contribution to the greening and softening of the street scene would be markedly diminished with limited space for any meaningful landscaping at the front of the site.

#### Setting of adjacent Heritage Assets

- 6.20 Located to the north east of the site, is the Grade II Listed 'Ivy House'. The proposed building would be viewed from the principal elevation of Ivy House, along Gosbrook Road.
- 6.21 As a result of the orientation of the proposed 'H' shaped building design, the longest elevation of the building, the north facing elevation, would be directly behind Ivy House, immediately adjacent the common boundary. The indicative design shows the north elevation (and south) consisting of broad mass extending across nearly 70% the width of the boundary and, at a scale of nearly three storeys, with dormer windows and balconies, this will be visually intrusive within views of the principal elevation of the listed building. Consequently, the scale, mass and design of the proposed building in this location is considered to harm the architectural and aesthetic value of this heritage asset and its setting.
- 6.22 For these reasons, the proposals would be contrary to Policies CC7, EN1 and H11 of the Reading Borough Local Plan 2019.

#### Amenity for Nearby Occupiers

- 6.23 Policy CC8 (Safeguarding Amenity) seeks to ensure development does not cause harm to the living environment of existing properties, in terms of loss of privacy, overlooking and visual dominance, amongst other things. Policy EN16 (Pollution and Water Resources) seeks to protect surrounding occupiers from the impact of

pollution.

- 6.24 The proposed building as indicatively shown, would extend right up to the side boundaries at nearly 3 storey in height. It is considered that this would be a visually dominant form of development which would have an unduly overbearing impact to the occupiers of No's 389 and 393 Gosbrook Road, and No.6 Send Road (whilst noting that 389 Gosbrook Road and 6 Send Road are not in residential use).
- 6.25 In terms of overlooking and privacy matters, first and second floor balconies are proposed on all elevations. Given the position, size and number of balconies proposed, they are considered to result in an increased perception of overlooking, as well as actual overlooking, to occupiers of neighbouring properties. The loss of privacy would be a marked, and uncomfortable, contrast to the current situation.
- 6.26 Further to the above, it should be noted that any increase in the size of the building due to detailed design requirements (room sizes, access arrangements, internal layout requirements etc), and/or the need to comply with the dwelling mix requirements of Policy H2 could significantly worsen these effects.
- 6.27 Given the orientation of the proposed building in relation to the properties along Forge Close, combined with the distances, whilst visible, the new building is unlikely to result in any significant material loss of light or overbearing impact to the occupiers of these properties.
- 6.28 However the other concerns raised above are sufficient to indicate that the proposal is contrary to Policy CC8 of the Reading Borough Local Plan 2019.
- 6.29 In terms of contaminated land, Environmental Protection colleagues recommend the standard four-stage conditions to ensure that the possible presence of contamination is thoroughly investigated and removed/mitigated if necessary (3 of the conditions are pre-commencement). The proposal is considered to accord with Policy EN16.

#### Quality of Accommodation for Future Occupiers

- 6.30 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. Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.
- 6.31 Indicative layouts of the units have been provided. However, the orientation of individual layouts to each flat have not been shown. In this respect, and when using the indicative layouts, looking at the side units, whilst assuming the double doors as shown at first and second floor would face outwards on to the balconies, at ground floor, that would mean the doors would face directly on to the site boundary within close proximity, indicating that the doors would unlikely be able to open. Furthermore, the proximity to the boundary would restrict the amount of natural light to habitable rooms as indicated and offering poor outlook.
- 6.32 Looking at the ground floor middle units, given the parking spaces indicated on the plans, near on directly in front of the only windows to serve the living/dining areas, resulting oppressive and unattractive places in which to spend time. This further compromises the quality of accommodation.
- 6.33 Given the above, it is not readily apparent how the amount of development proposed might be arranged differently and it is considered that the proposals fail

to demonstrate that the proposed development would provide a suitable quality of daylight, and outlook for future occupiers, especially at ground floor.

- 6.34 The indicative plans suggest that the units would meet the minimum gross internal floor areas as set out in the nationally prescribed space standards and Policy H5 (Standards of Housing) ie. 70m<sup>2</sup> for 2 x bed units and 50m<sup>2</sup> for 1 x bed units. However, the Policy and space standards also states that in order to provide two bed spaces, a double (or twin bedroom) has a floor area of at least 11.5m<sup>2</sup> and in order to provide one bed space, a single bedroom has a floor area of at least 7.5m<sup>2</sup>. Not all the units appear to achieve this. Furthermore, not all units would be double aspect and the size of the units proposed would, overall, provide a cramped and generally poor standard of accommodation, another indication of the overdeveloped nature of the site.
- 6.35 Policy H10 deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. *"The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity"*. Para 4.4.87 of the RBLP sets out that *"in the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals: (b) Flats outside central Reading: 1 and 2-bedroom: 25 sq m per flat.."*
- 6.36 Linked to the above concerns regarding overdevelopment of the site, whilst some private amenity space is to be provided in the form of balconies, the overall useable amenity space to these units would be limited and not characteristic of those in surrounding plots. There would be no communal space and, whilst landscaping is a reserved matter, the proximity and amount of parking/hardstanding and bins stores as indicated, would not form an attractive or enjoyable area of outdoor amenity space and would be compromised by vehicles manoeuvring immediately next to it, making it an unappealing space for relaxing and /or playing. On this basis, the quantity and quality of the proposed amenity space would be inadequate and fail to meet the minimum requirements sought by Policy H10.
- 6.37 In these regards the numerous individual shortfalls identified, when considered cumulatively, result in the overall conclusion that the quality of accommodation for future occupiers would be contrary to Policies H5 and H10 of the Reading Borough Local Plan 2019.

#### Mix of units

- 6.38 Policy H2 (Density and Mix) addresses density and housing mix and states that this will be informed by character and mix of the area; accessibility; the need to achieve high quality design; maximise efficiency of land; need to minimise the environmental impacts including detrimental impacts on the amenities of adjoining occupiers. The Policy states that, *"Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms."*
- 6.39 In respect of a scheme of this size, the Policy seeks to ensure that on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, and the majority of dwellings will be in the form of houses rather than flats, having regard to all other material considerations. This development proposal will provide a dwelling mix consisting of 14 x 1 bed and 2 x 2 bed units, with no 3 bed units proposed and all within the form of flats. The

proposal therefore falls short of the targets for mix and type of dwellings set by Policy H2 and having considered the suburban characteristics of the existing site and wider surrounding area, this shortfall forms a reason for refusal.

#### Transport

- 6.40 Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development.
- 6.41 The proposed development would result in the separation of the parking areas and as such would require a vehicular access located both on Send Road and Forge Close. Whilst this could be acceptable in principle, given that access is to be considered as part of this Outline application, details illustrating the design of the accesses are required and have not been submitted with the application. Furthermore, details should be provided identifying the existing access points, and confirming that these would be reinstated following the creation of the proposed access points.
- 6.42 Further to the above, whilst 16 car parking spaces are shown to be provided, the proposed development is one car parking space short as no visitor parking or disabled bays have been provided. Whilst matters of detail, these would have an impact on the design of the access and therefore relevant to the design of the access.
- 6.43 Given the above, insufficient information has been submitted with the application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. As such, the application fails to demonstrate that the proposed vehicular accesses would not adversely affect the safety and flow of users of the existing road network. The proposal is therefore contrary to Policies TR1, TR3 and TR5 of the Reading Borough Local Plan 2019.

#### Landscaping/Trees

- 6.44 Policy CC7 (Design and the Public Realm) seeks that development should contribute positively to the area of Reading within which it is located, including by way of landscaping. Policy EN14 (Trees Hedges and Woodlands) states that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal, and the Borough's vegetation cover will be extended with new development to make provision for tree planting within the application site, or off-site in appropriate situations.
- 6.45 The application requires the removal of a number of smaller ornamental trees and soft landscaped areas within the residential gardens of the existing properties, with no viable opportunity for new tree and landscape planting on site. There would be large areas of hard landscaping for parking both on the Send Road and Forge Close sides of the development and whilst the plans show areas indicated for 'landscaping' which wrap around the eastern and western wings of the proposed building, this would be limited to a narrow strip either side of the building. Furthermore, the areas of 'landscaping' in the under-crofts of the building would not have any significant wider amenity value and would not be wide enough to support any additional new tree or shrub landscaping planting. It would be impractical to include landscape planting within the under-croft areas as the lack of light would prevent any new planting from thriving in this location. Indeed, any new planting would be dependent on artificial irrigation to survive and therefore would be vulnerable to neglect. Any new tree or landscape planting within the areas indicated would also be likely to conflict with the property as it matures.

- 6.46 Whilst acknowledging that landscaping is a future consideration, given the above, the application fails to demonstrate that sufficient tree and landscaping could be provided. As such the proposal is contrary to Policies CC7 and EN14 of the Reading Borough Local Plan 2019 as well as Objectives 5 (Climate Adaption) and 8 (The Role of New Developments) in the adopted Tree Strategy.

#### Ecology

- 6.47 Policy EN12 (Biodiversity and the Green Network) states that development proposals should retain, protect and incorporate features of biodiversity. Furthermore, Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

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

- 6.48 The surrounding area contains gardens with tree lines which connect in the wider landscape to the River Thames to the south of the application site. This provides suitable habitat for use by foraging and commuting bats. Furthermore, the existing buildings may contain features that could be suitable for use by roosting bats and, due to the location of the site and the extent of the works, there is a risk that the proposals may affect roosting bats and a bat survey has report has not been provided in this respect.
- 6.49 In this case, it has not been established whether the presence or otherwise of bats (a protected species) will be affected by the proposals, and nor are there any “exceptional circumstances” that would enable the council to condition further surveys should the application be approved.
- 6.50 Given the above, there is insufficient information for the Council to determine whether or not protected species (a material consideration) would be affected by the proposed development. As such the proposal is contrary to Policy EN12 of the Reading Borough Local Plan 2019.

#### Sustainability

- 6.51 Policies H5 (Standards for New Housing) seeks that all new building housing is built to high standards. In particular, new housing should meet water efficiency standards above building regulations, and zero carbon homes standards (for major schemes). Policy CC2 (Sustainable Design and Construction) and CC3 (Adaption to Climate Change) seeks that proposals should incorporate measures which take account of climate change.
- 6.52 The Council’s Sustainable Design and Construction SPD (2019) requires that in order to achieve zero carbon homes standards all development must, as a minimum, achieve a 35% improvement in the dwelling emission rate over 2013 Building Regulations Standards with a financial contribution required to off-set any remain carbon emissions to zero.
- 6.53 No sustainability or energy reports have been submitted with the application, and

no reference made to zero carbon homes or Policy H5. Should the application have otherwise been considered acceptable, written verification of the proposals achieving the above would be secured by way of pre-commencement conditions. Pre-occupation submission and approval of an as built energy assessment would also be required to demonstrate the actual achieved dwelling emission rate of the development. A mechanism would be included within a legal agreement to ensure any remaining emissions of the as built development are off-set to zero by way of carbon off-setting financial contribution.

- 6.54 The proposed development fails to demonstrate compliance with the above in this respect and is therefore contrary to Policies H5, CC2 and CC3 of the Reading Borough Local Plan 2019.

#### Affordable Housing

- 6.55 In terms of affordable housing Policy H3 (Affordable Housing) seeks that for development proposals of more than 10 dwellings, 30% of the total dwellings will be in the form of affordable housing. In this respect, the applicant considers that the development cannot sustain such a contribution towards affordable housing.
- 6.56 Policy H3 is clear that only in instances where it can be demonstrated through evidence that making affordable housing contribution would render the scheme unviable will the Council forgo or seek a lower or deferred contribution. It has not been demonstrated through assessment of a viability appraisal that the development is completely unviable without the submission of some contribution towards affordable housing.
- 6.57 In the absence of the required 30% on-site provision or financial contribution, the proposed development would not therefore make adequate provision for the delivery of affordable housing, failing to comply with Policy H3 and the Affordable Housing Supplementary Planning Document (2013).

#### Other Matters

##### *S106 and CIL*

- 6.58 In addition to Affordable Housing requirements set out above, as the scheme falls within the Major category it would be required to provide an Employment Skills and Training Plan for the 'Construction Phase', or equivalent financial contribution. Both options could be secured via S106 agreement at Outline stage, to include a mechanism to determine the exact amount sought at Reserved Matters stage (dependent on the final amount of floorspace proposed) based on the formula: £2,500 x Gross internal floor area of scheme (m<sup>2</sup>) / 1000m<sup>2</sup>. This would be secured within a S106 legal agreement if the application were recommended for approval.
- 6.59 CIL would apply to the proposals, subject to the usual reliefs or exemptions set out in the CIL Regulations. It is not possible to calculate the CIL charge until full floorspace details are provided at Reserved Matters stage.

##### *Equalities Impact*

- 6.60 When determining this application, 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 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.

## **7. CONCLUSION/PLANNING BALANCE**

- 7.1 In support of the application is the provision of 16 residential units, in a location that has good access to a range of services and facilities. In seeking to bring forward housing development in an accessible location, the proposal accords with the general thrust of the development plan to some extent. There would be some social and economic benefits in boosting housing supply and associated with employment during the construction phase.
- 7.2 However, in terms of its more detailed effects, the fundamental harm arising from the development as identified in the above report, is considered to significantly outweigh the benefits.
- 7.2 This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019 and supplementary planning documents. The recommendation is to refuse outline planning permission for the reasons shown above.

Case Officer: Miss Ethne Humphreys



**STREET VIEW SEND ROAD**



**STREET VIEW FORGE CLOSE**



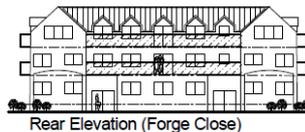
Proposed Development  
16 Flats  
2 - 4 Send Road  
Reading RG4 8EH

SITE PLAN

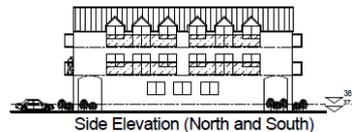
1:200 A2 JUNE 2019 sk3 rev B



Front Elevation (Send Road)

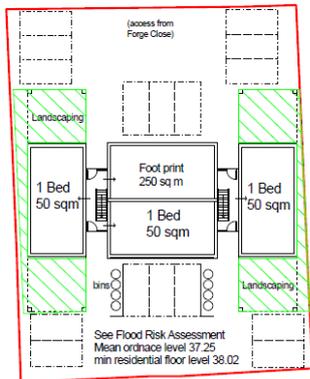


Rear Elevation (Forge Close)



Side Elevation (North and South)

Subject to site survey  
Indicative layouts  
do not scale

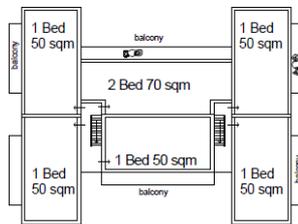


Site and Ground Floor 1:200

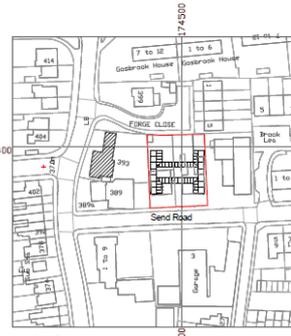
14x One Bed Flats  
50 sqm nett area each

2 x Two Bed Flats  
70 sqm nett area each

16 parking spaces

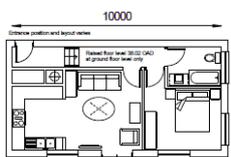


First and Second Floor 1:200

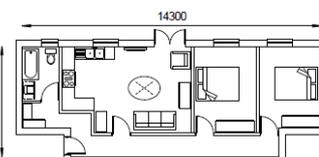


Location Plan 1:1250

Using topographical survey drawn  
RT3190503P0001  
Proposed Foot print  
250 sq m  
2 Send Road, Bungalow  
no extensions or outbuildings  
125.67 sq m  
4 Send Road Commercial Building  
135.51 sq m  
Total existing area = 262.18 sq m  
Net Gain Area = -12.18 sqm (negat)



1 Bed flat layout 1:100



2 Bed flat layout 1:100

Proposed Development  
16 Flats  
2 - 4 Send Road  
Reading RG4 8EH

1:200 A2 JUNE 2019 sk3 rev