

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 29 March 2023

Ward: Abbey

App No.: 221563/FUL

Address: 1 Epping Close, Reading

Proposals: Proposed demolition of 8 garages and construction of 2 x 3 bedroom residential units.

Applicant: Metrus Ltd

Deadline: 28th March 2023

RECOMMENDATION:

REFUSE planning permission for the following reasons:

1. The proposed development, due to its excessive scale, site coverage, layout and insufficient landscaped areas would represent a cramped overdevelopment of the site which fails to accommodate built form, parking areas and landscaping in a manner that enhances the character and appearance of the area. As such the proposal would be harmful to the appearance of the street scene and would fail to preserve or enhance the character and appearance of the Castle Hill/Russell Street/Oxford Road Conservation Area. The proposal is therefore contrary to Policy CC7, EN1, EN3 and EN6 of the Reading Borough Local Plan 2019.
2. The proposed development, due to its uncharacteristic appearance, inappropriate external materials, architectural form, scale and prominence would appear as an inappropriate and unsympathetic development that would not be of a sufficient high quality design and fail to preserve or enhance the character or appearance of the Castle Hill/Russell Street/Oxford Road Conservation Area. The proposal is therefore contrary to Policy CC7, EN1, EN3 and EN6 of the Reading Borough Local Plan 2019.
3. The proposed development, due to its scale and siting in relation to neighbouring dwellings and private gardens to the rear of the site, would result in a visually dominant and overbearing impact with consequent harm to the amenity of neighbouring occupiers. The proposal is therefore contrary to Policy CC8 of the Reading Borough Local Plan 2019.
4. The proposed dwellings would receive insufficient interior daylight due to their internal layout, single aspect design and overshadowing from trees and balconies. This would result in a detrimental impact to the living environment of future occupiers. This would be contrary to Policy CC8 of the Reading Borough Local Plan 2019.
5. The proposed development, due to the minimal size and inappropriate siting of the gardens, combined with the overshadowing from trees on and adjacent the site, would not provide adequate and functional outdoor private amenity space for future occupiers. This would also not reflect the size or character of private residential gardens in the surrounding area. The proposal is therefore contrary to Policies CC7 and H10 of the Reading Borough Local Plan 2019.
6. The proposed development would result in an unjustified loss of parking provision for the residents of Epping Close. This would result in on-street parking that would adversely affect road safety and the flow of traffic. The proposal is therefore

contrary to Policy TR3 of the Reading Borough Local Plan 2019.

7. The proposed vehicular parking layout would provide insufficient parking to serve the new dwellings and would not comply with the Parking Standards and Design SPD in respect of vehicle parking. This would result in on-street parking that would adversely affect road safety and the flow of traffic. The proposal is therefore contrary to Policies TR3 and TR5 of the Reading Borough Local Plan 2019.
8. The proposed development would result in the loss of 4 trees of amenity value and would be likely to result in pressure to prune or fell those trees shown to be retained. In addition, the development fails to provide acceptable additional and replacement tree planting and soft landscaping with consequent harm to the visual amenity, character and appearance of the conservation area, biodiversity and environmental quality of the area. The proposal is therefore contrary to Policies CC7, EN3 and EN14 of the Reading Borough Local Plan 2019.
9. The proposal has failed to demonstrate that the proposal would not disrupt the roosting environment of bats within existing trees, with consequent failure to demonstrate there would be no adverse effect on wildlife and protected species and the ecological value of the site. The proposal is therefore contrary to Policy EN12 of the Reading Borough Local Plan 2019.
10. The development has failed to demonstrate that there would be no net loss of biodiversity or that a biodiversity net gain would be achieved, through ecological enhancements either on or off site. The proposal is therefore contrary to Policy EN12 of the Reading Borough Local Plan 2019.
11. 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. The proposal is therefore contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021.

Informatives

1. Plans refused
2. Positive and proactive
3. Without prejudice to any future appeal
4. CIL
5. Pre-app

1. INTRODUCTION

- 1.1 The site relates to a block of 8 garages located to the north boundary of Epping Close. There is a change in site levels and the site slopes downwards to the north towards Baker Street, to the rear.
- 1.2 The site is within the Castle Hill/Russell Street/Oxford Road Conservation Area. There are listed buildings to the north, fronting Baker Street.
- 1.3 Epping Close features contemporary mid-twentieth century blocks of flats



Site Photograph - looking towards garages and 57 Baker Street Development



- 1.7 This application has been called-in for Committee determination at the request of Councillors Page and Rowland due to concerns over loss of the

garages, increased traffic and impact on the Conservation Area and in view of a number of concerned representations received from members of the public.

2. PROPOSAL

2.1 Full Planning Permission is sought for two 3-bedroom dwellings following demolition of the existing garages.

2.2 Two car parking spaces are proposed, one for each dwelling.

2.3 It is proposed to remove four trees, with two replacement trees proposed.

2.4 The proposed materials would include:

- White render
- Buff yellow brickwork
- Cedar boarding
- Cedar doors
- Aluminium windows
- Aluminium fascia
- Glass balustrading

2.5 The proposal would be a Community Infrastructure Levy (CIL) liable development. The applicant has provided the CIL Additional Information Form. Based on the information provided by the applicant and the 2023 CIL rate, this is estimated to amount to £12,111.85 (172m² of the proposals - 99.5m² (buildings to be demolished) x £120 per m² x 2022 indexation (£167.06)). If the scheme had been acceptable an informative would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

2.6 SUBMITTED PLANS AND DOCUMENTS:

Location and Block Plans PL-101 Rev A
Existing Site Plan PL-102 Rev A
Proposed Site Plan PL-104
Proposed Elevations Sheet 2 showing 57 Baker Street PL-109 Rev A
Proposed Cross Section AA showing 57 Baker Street PL-110 Rev A
Received 15th March 2023

Existing Garage Elevations PL103
Proposed Ground Floor Plan PL-105 Rev A
Proposed First Floor Plan PL-106 Rev A
Proposed Roof Plan PL-107 Rev A
Proposed Elevations Sheet 1 PL108
Proposed Materials PL-111
Proposed CIL Drawing PL-112

Arboricultural Impact Assessment dated 11th October 2022
Affordable Housing Statement
Daylight and Sunlight Report dated 25th November 2021
Design and Access, Planning and Sustainability Statement
Small Site Metric Beta Test
Tree Survey
Received 25th January 2023

Heritage Statement
Received 31st January 2023

3. PLANNING HISTORY

3.1 None at the site

Other Nearby Sites of Relevance

57 Baker Street

3.2 180624/FUL - Erection of two 2/3 storey buildings to provide 9 (2x2-bed and 7x3-bed) residential units (Class C3), 9 parking spaces, landscaping and associated works. Permitted and constructed.

4. CONSULTATIONS

Internal Consultees

Conservation and Urban Design Officer (CUDO)

4.1 OBJECT due to impact on character and appearance of Conservation Area. Discussed further below.

Natural Environment

4.2 OBJECT due to loss of trees, pressure to prune those to be retained and insufficient tree planting and soft landscaping. Discussed further below.

Ecology

4.3 OBJECT due to possible impact on roosting bats in trees to be removed and failure to demonstrate net gain in biodiversity. Discussed further below.

Transport

4.4 OBJECT due to loss of garages and insufficient parking for future occupiers. Discussed further below.

Environmental Protection

4.5 No objection submission to conditions in respect of contaminated land. Discussed further below.

External Consultees

Reading Conservation Area Advisory Committee (CAAC)

4.6 No comments received.

5. Publicity

5.1 Neighbour letters were sent to the occupiers of nearby properties and site notices were displayed. Advertised in local press on 13th February 2023.

5.2 22 letters of objection received (3 from the same property) concerned with (in summary):

Inaccurate plans not showing Baker Street/Fox Talbot development
Loss of garage parking to Epping Close residents
Insufficient parking for future occupiers
Loss of privacy/light/overbearing

Out of character with pattern of development
Cramped/overdevelopment
Poor design/out of character with area/conservation area
Lack of amenity space
Loss of trees/greenery
Trees to be felled outside red line and ownership
Insufficient tree planting/soft landscaping
Environmental harm
Impact on wildlife
Issues with bins/vermin
Opportunistic crime
Noise and disturbance from construction process
Loss of property value

6. RELEVANT PLANNING POLICY AND GUIDANCE

6.1 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) - among them the 'presumption in favour of sustainable development', which means 'approving development proposals that accord with an up-to-date development plan without delay' (NPPF paragraph 11).

National Planning Policy Framework 2021 National Planning Guidance 2014 onwards

6.3 The relevant sections of the NPPF are:

Section 2 - Achieving Sustainable Development
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 15 - Conserving and Enhancing the Natural Environment
Section 16 - Conserving and Enhancing the Historic Environment

6.4 **Reading Borough Local Plan (November 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
EN3: Enhancement of Conservation Areas
EN6: New Development in a Historic Context

EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland
EN15: Air Quality
EN16: Pollution and Water Resources
H1: Provision of Housing
H2: 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

6.5 Relevant Supplementary Planning Documents (SPD) are:

Affordable Housing SPD (2021)
Revised Parking Standards and Design SPD (2011)
Revised SPD on Planning Obligations under Section 106 (2019)
Sustainable Design and Construction SPD (2019)

Other relevant documentation / guidance / legislation

Castle Hill/Russell Street/Oxford Road Conservation Area Appraisal (2010)
Historic England Good Practice Advice in Planning Note 1: Conservation Area Designation, Appraisal and Management (Historic England, 2016)
Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)
Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015b)
Principles of Conservation (Historic England, 2008)
Guide to the Conservation of Historic Buildings (British Standards Publication BS 7913:2013, 2015)
DCLG Technical housing standards - nationally described space standards (2015)
Reading Tree Strategy (2021)
Biodiversity Action Plan (2021)
National Design Guide: Planning practice for beautiful, enduring and successful places (2019)

7. APPRAISAL

Land Use Matters

- 7.1 The National Planning Policy Framework (NPPF) state that LPAs should “encourages the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value”.
- 7.2 From a purely land use perspective, provision of housing would align with the broad objectives of Policy H1 (Provision of Housing) in assisting meeting annual housing needs. However, this is subject to the more detailed consideration of relevant Local Plan policies and the context of the application site. As the remainder of this report demonstrates, the proposal has failed to satisfactorily meet a number of other policy criteria.

Design, Impact on Heritage Assets and Street Scene

- 7.3 Policies CC7 (Design and the Public Realm) and H11 (Development of Private and Residential Gardens) both seek to ensure that new development enhances and preserves the local character. Policy H10 (Private and Communal Outdoor Space) states that “the design of outdoor areas will respect the size and character of other similar spaces in the vicinity”.
- 7.4 The site lies within the Castle Hill/Russell Street/Oxford Road Conservation Area and as such there is a duty imposed by Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring decision makers to have special regards to the desirability of preserving or enhancing the character or appearance of a Conservation Area. This is reflected in Policy EN1 (Protection and Enhancement of the Historic Environment) which states that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. Policy EN3 (Enhancement of Conservation Areas) requires that the special interest, character and architecture of Conservation Areas will be conserved and enhanced and that development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Further to this, Policy EN6 (New Development in an Historic Context) states that in areas characterised by heritage assets, the historic environment will inform and shape new development. The Council will, therefore, have regard to both the quality of the townscape and the quality and interest of the area, rather than solely that of the individual building.
- 7.5 Paragraph 130 of the NPPF 2019 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment
- 7.6 Paragraph 199 of the NPPF 2019 details that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 7.7 The National Design Guidance identifies 10 key components for good design and of particular note is the characteristic of ‘Context’ and it states that “well designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones.” Additionally, there is specific reference to ‘views inwards and outwards’.
- 7.8 The existing garage block is not particularly attractive in appearance, nor is it of any architectural or historic interest. That said, due to its low height and position within Epping Close, the garage block is unobtrusive within the street scene. Any replacement building must be appropriate in all other aspects (which is detailed further below). In this instance there are significant concerns with the proposals, which are not considered to preserve or enhance the character and appearance of the Conservation Area. Furthermore, the proposed scale and layout would also result in other concerns as set out below.

- 7.9 As can be seen from the proposed site plan, the proposed building would be located immediately adjacent the north and west boundary, with no relief, effectively filling the site to its margins such that it would appear cramped and overdeveloped. Whilst indicative soft landscaping is shown, there would be a distinct dominance of built form and hardstanding with little space for meaningful soft landscaping. As a consequence of the siting of the dwellings, the proposed garden areas would be located to the front of the site. This would be out of keeping with the prevailing pattern of development and the need for which is symptomatic of the overdeveloped nature of the site and the consequential introduction of inappropriate design and layout elements.
- 7.10 Further to the above, the Conservation Area Appraisal notes, at paragraph 6.3.6 that a negative feature of this character area is “the creation of hardstandings for bins in front gardens”. The front garden areas would largely be made up by patio rather than lawn which does little to soften the frontage and indeed would house the bins, which, as above, is considered a negative design response.
- 7.11 Another negative feature of this character area as noted at paragraph 4.3 is that “further greening is desirable throughout the Conservation Area.”. As above, there is limited space for meaningful soft landscaping and the front of the site would largely comprise of hardstanding presenting a cramped layout in terms of scale and the relationship between buildings, parking areas and landscaping within the site.
- 7.12 In terms of the design and appearance of the proposal, the applicant contends that the contemporary design would make a positive contribution to - and sit comfortably in - the conservation area. Although modern and innovative design is often welcome this is subject to the fundamentals of scale, layout and landscaping, as well as appearance being acceptable within a suitable location and context and in this instance of a high quality design that is well related to the character of the Conservation Area.
- 7.13 Due to the constraints of the site, the design approach has been forced to fit the site. The side elevations lack architectural detailing, visual interest and refinement, presenting blank elevations which would be unattractive and would have a poor appearance - and to a lesser extent the same with the rear elevations. The need to restrict the height of the building at the rear highlights the awkwardness of the site layout and the incompatibility of the design with the character of the street scene and wider conservation area. The proposed sedum roof could add visual interest to the proposal; however, it would not be a clearly visible element of the scheme when viewed from the front of the site and as discussed elsewhere in this report it is not clear whether its construction would even be possible. In overall terms, the proposed design is considered to offer a bland appearance. The proposed modern materials (glass, vertical timber panelling, zinc fascias) are not considered sufficient in themselves to create a visually interesting building or to mitigate the shortcomings of the fundamentals of the design. The proposal fails to provide replacement-built form of a high quality design and therefore cannot be considered to enhance the character and appearance of the conservation area.
- 7.14 Although the proposed building would have a limited wider visibility owing to its set back positioning within Epping Close, it would nonetheless be visible when passing and when viewed from Baker Street development at

the rear and from the forecourt of the flats at Epping Close. Thus, it would have a cramped and incongruous appearance within the street scene that would not reflect the prevailing pattern or character of development.

- 7.15 The unacceptable impact of the proposals would be relatively localised in comparison to the total size of the Conservation Area and as such the harm to the Conservation Area identified above would be less than substantial. In these circumstances paragraph 202 of the National Planning Policy Framework says that the harm should be weighed against the public benefits of the proposal.
- 7.16 The public benefits of the proposal in this case lie in the provision of two units of accommodation in an accessible location. In addition, there would be some limited economic benefit attached to the development. Nevertheless, in weighing up the planning merits of the proposals and applying a critical planning balance, it is considered that the benefit of the contribution to the supply of housing (two 3-bed dwellings) is small and general in nature and that the need can be met elsewhere in the Borough. Consequently, it carries little weight when balanced against the failure of the proposal to preserving or enhance the character or appearance of the Conservation Area and indeed the conclusion reached that the Conservation Area would be harmed by reason of the new building's cramped layout inappropriate appearance (as well as the loss of trees and absence of meaningful landscaping discussed below).
- 7.17 In conclusion on this point, it is not considered that the proposed development would preserve or enhance the appearance of this part of the Castle Hill/Russell Street/Oxford Road Conservation Area and its contribution to the designated area as a whole, and would fail to preserve or enhance local distinctiveness, contrary to Policies CC7, EN1, EN3, EN6 and H10 and of the Reading Borough Local Plan 2019.

Impact on Neighbour Amenity

- 7.18 Residential amenity is assessed against Policy CC8 which requires developments to not cause a detrimental impact on the living environment of existing properties in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; and Crime and safety.
- 7.19 As above, the development to the rear of the site at Baker Street, is complete. Epping Close is at a higher level than the properties to the rear and there would only be a distance of 4.6m back-to-back between the proposed dwellings and the rear of these properties, with the proposals immediately abutting the rear gardens. Given this limited separation distance, combined with the height of the proposed development this is considered to result in an unacceptable visually dominant and overbearing impact to occupiers of these properties and their private garden spaces.
- 7.20 A Daylight and Sunlight Report has been submitted with the application. This acknowledges that the rear gardens to the development at Baker Street are small. Indeed, the report considers that sunlight to some of these gardens is already limited due to the position and location of the existing single storey garages. The report concludes that these gardens would experience additional overshadowing as a consequence of the proposed

development. On this basis, combined with the above, it is clear that the proposals would result in harmful overbearing effects to neighbouring amenity.

- 7.21 The proposals are not considered to result in any significant material loss of light, privacy or overbearing effects to other nearby dwellings

Amenity of Future Occupiers

- 7.22 Policy H5 (Standards for New Housing) seeks that all new housing is built to high standards. Policy EN16 (Pollution and Water Resources) seeks to protect future occupiers from the impacts of pollution and Policy H10 (Private and Communal Outdoor Space) seeks that residential developments area provided with adequate private or communal outdoor amenity space.
- 7.23 The proposed living accommodation is considered in overall terms to be poor.
- 7.24 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"*.
- 7.25 The proposals include a first floor balcony to each dwelling, as well as small front garden/patio area. The submission also indicates that future occupiers would have use of the communal grounds around the existing block of flats. Whilst this is noted, it does not remove the need for suitable private on-site amenity space to provide for the increased number of dwellings.
- 7.26 The amount of amenity space would be very small. Furthermore, it would be sandwiched between the front of the dwellings and the proposed car parking, appearing cramped and offering a poor standard of amenity. The poor quality of the private amenity space would be further exacerbated by the presence of the existing trees to be retained, which would limit the amount of natural light to the front gardens - and as shown on the submitted shade path tree constraints plan. The relationship between the trees and proposed accommodation would likely lead to tension between their management and the living conditions of future occupiers. It is clear that the proposals would not allow for an attractive or enjoyable garden area.
- 7.27 The size of the proposed garden space also does not compare favorably with those in the vicinity. Whilst it is recognized that the development at 57 Baker Street to the rear also has smaller gardens, nevertheless, these are larger than those proposed, and would not be restricted by the same tree shadowing and there is also a shared mews garden between the two terraces at that site. Given the size and quality of the amenity space proposed, it is considered that the private amenity space is not adequate for the proposed dwellings.
- 7.28 The existing trees would also impact on light levels to future occupiers of the western dwelling, given the close proximity and shade path of the trees as indicated. Furthermore, light levels to the ground floor would be further restricted by the position and projection of the proposed first floor

balcony. Given this and the single aspect nature of the dwellings, it is considered that the dwellings would receive insufficient daylight levels internally resulting in harm to the amenity of future occupiers. It is noted that the Daylight/Sunlight Report submitted with the application does not assess the impact on future occupiers.

- 7.29 The proposed floor plans indicate that the third bedroom to each dwelling, located at first floor, would have a floorspace of 12.3m. However, given the shallow roof slope, the actual useable floorspace would appear to be considerably less than this, with a significant extent of the space affected by the slope of the roof. The size and roof slope would create an oppressive and confined living space, which as above, would also be compromised by shade from the trees and which would add further harm to the amenity of future occupiers.
- 7.30 It is also noted that the harm to amenity identified above further demonstrate that the proposals would be an overdevelopment of the site. Contrary to Policies CC5, CC8 and H10.

Transport Matters

- 7.31 Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway-Related Matters) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.
- 7.32 The development is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically, this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.
- 7.33 The applicant has stated that the garages proposed to be demolished are too small to be used adequately and so their loss would not result in a reduction in parking on the site. The applicant has stated that the garages are not allocated to the existing flats in Epping Close, but that a number are leased to local residents.
- 7.34 Conversely, the original decision notice for the development on Epping Close dated 1978, illustrates an approved parking layout which is associated with the flats. The decision notice included a condition that stipulated that the garage units “*shall be reserved exclusively for the use of the occupants of the flats hereby permitted*”. The reason for the condition was “*to provide and reserve adequate parking/garaging provision for the residents of the development hereby permitted*”. There are also additional dedicated parking bays located within the garage court that would also be lost, which has not been referenced by the applicant.
- 7.35 Previous Transport comments provided to the applicant had requested confirmation of the number of units leased and where the lease holders are from i.e. name of the road/ post code as they may not necessarily be from Epping Close. This information has not been provided with this application. Therefore, it has not been possible to fully establish if the garage units are leased by local residents. However, there would be a clear reduction in existing car parking spaces. Furthermore, concern over the loss of the garages is borne out by the strength of local objection to the application,

with a number of local residents of Epping Close confirming use of the garages.

- 7.36 In accordance with the adopted Parking Standards and Design SPD, the development would require 2 off road parking spaces for each 3 bedroom dwelling. Submitted site plan Drawing PL 104 Rev A only illustrates 1 parking space for each dwelling, which falls short of the Council's Parking Standards. 2 parking spaces would be required for each dwelling to ensure that any overall flow of parking did not impact on the remaining area of parking/garages for residents of the adjacent flats.
- 7.37 The development site is located in an area designated as a Residents Parking Permit Area; Zone 08R. Under the Borough's current parking standards and given the above, the proposal is considered to generate unacceptable additional pressure for parking in the area. Given that parking would be below the Council's adopted standards, the Highway Authority are anxious to ensure that any development does not exacerbate this situation through creation of additional pressure for on-street parking in the local area.
- 7.38 Policy TR5 includes a requirement for each new house to be provided with an electric charging point. This has not been illustrated on plans. Should the application have otherwise been considered acceptable this could have been dealt with by way of a suitably worded condition.
- 7.39 In accordance with the adopted Parking SPD, the development would be required to provide a 2 parking spaces for each dwelling which should be in a conveniently located, lockable, covered store equipped with Sheffield type stands or a suitable equivalent. Cycle storage for the houses can be in the form of a secure garden shed. Detailed plans confirming that the cycle parking provision meets the Council's adopted standards in terms of layout would be required. Should the application have otherwise been considered acceptable this could have been dealt with by way of a suitably worded condition.
- 7.40 The Council's standards do allow for a reduced parking provision for residential development, where it can be satisfactorily demonstrated that there would be no detriment to highway safety as a result. No evidence has been submitted by the applicant to suggest that this would not be the case.
- 7.41 Given the above, the proposed development will intensify the use of the site above its current level and create additional pressure for on-street parking and the proposals are contrary to Policies TR1 and TR3.

Natural Environment - Trees, Landscaping and ecology

- 7.42 Policy EN14 (Trees, Hedges and Woodland) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks that proposals should include appropriate landscaping. Given that the site is also located within a Conservation Area, an Air Quality Management Area, and within a low canopy cover ward, tree retention and planting is a high priority and proposals should demonstrate an appropriate level of greening and/or net gain in the number of trees.

- 7.43 There are a number of trees in and around the site. It is proposed to remove four trees, which all appear to be outside of the site boundary. Whilst there may be questions over the long term health of those trees, it is apparent that they currently contribute positively to the visual quality of the site and surroundings and would be difficult to replace. It is proposed to provide replacement planting of two silver birch trees (of a much smaller canopy species than those to be lost) this appears to be a consequence of the overdeveloped nature of the proposal which leaves little space for meaningful tree planting. As such, there would be a loss of overall greenery on the site. It is also clear that replacement planting would take time to establish and grow and would not be capable of a true replacement of the existing trees which currently characterise and add to the visual amenity of the site in the short to medium term.
- 7.44 A sedum roof is proposed; however, as discussed elsewhere in this report, it is not known whether the proposed roof would work in practice. Even if it were to be successful, it would not be readily visible and would offer little compensation for the loss of trees and lack of replanting opportunities referred to above.
- 7.45 Given the above concerns regarding insufficient lighting to the proposed accommodation, the development would be likely to result in pressure to prune trees to be retained due to overshadowing from their canopies, this would add additional harm to the already harmful loss of trees currently proposed.
- 7.46 The proposed development fails to demonstrate acceptable provision of replacement tree planting and soft landscaping with consequent harm to visual amenity, the character and appearance of the conservation area, air quality, biodiversity and environmental quality of the area, contrary to Policies CC7 and EN14. It would also be contrary to the objectives of the Tree Strategy and would not comply with the Sustainable Design and Construction SPD which states that 'development will not be permitted which would undermine current levels of tree cover as this is likely to be damaging to climate change adaptation strategies'.

Ecology

- 7.47 Policy EN12 (Biodiversity and the Green Network) seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable.
- 7.48 The garages are unlikely to be suitable for use by roosting bats and the Council's Ecologist has confirmed that there would be no objection to the loss of the garages on ecology grounds. However, as above, the proposals include the loss of 4 trees. Two of these trees (Horse Chestnut and large Sycamore) could contain features suitable for roosting bats. A bat roost assessment of all trees to be removed would be required and this has not been submitted.
- 7.49 Given the nature of the scheme, it would also have been appropriate to ensure that ecological enhancements were provided, namely bird/bat boxes and wildlife friendly landscaping. The proposals include a swift box

and bat box to each side elevation of the proposed dwellings, which the applicant considers would result in an overall net gain in biodiversity. The Council's Ecologist has confirmed that the location proposed (height) would not be sufficient.

- 7.50 A sedum roof is also proposed, to enhance the biodiversity credentials of the scheme. The Council's Ecologist has confirmed that the sedum roof, proposed on a 1 in 3 gradient, would be unusually steep and the proposed sedum roof may in fact not be feasible. There are no detailed plans or sections through the roof and it is not clear if the building would be strong enough to support the roof proposed. The Council needs to be confident that the sedum roof could actually be installed and deliver the benefits suggested.
- 7.51 In overall terms, there is little proposed in the way of meaningful biodiversity enhancements and the lack of space for soft landscaping and the proposed loss of trees is a key contributor to this.
- 7.52 Furthermore, proposals should demonstrate how development would result in a 'net gain' in biodiversity units as measured using the DEFRA 3 Metric. Whilst a screenshot of a biodiversity net gain calculation has been provided, the DEFRA excel calculator has not been supplied and as such it is not possible to assess the validity of the valuation. Maps and habitat assessment sheets that clearly show the habitats before and after development would also be required and have not been provided.
- 7.53 Given the above, the applicant has failed to submit sufficient information for the Council to demonstrate that the ecological value of the site would be maintained and enhanced or to determine whether or not bats would be adversely affected. As such the proposals fail to demonstrate there would be no adverse effect on wildlife and protected species and the ecological value of the site. The proposal is therefore contrary to Policies EN12 and H11 of the Reading Borough Local Plan 2019.

Affordable Housing

- 7.54 In accordance with Policy H3 (Affordable Housing) the proposed development, being for 2 additional dwellings, would be required to provide for an off-site affordable housing contribution equivalent of 10% of the Gross Development Value of the development.
- 7.55 The applicant stated they agreed in principle to enter into a legal agreement to secure a financial contribution and GDV valuations to calculate the contribution have been submitted. However, given that the proposal is not considered acceptable in other planning terms, the Council has not pursued the S106 legal agreement to secure the financial affordable housing provision. The proposal is therefore contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019.
- 7.56 An informative will specify that this reason for refusal could be overcome, in the context of an acceptable scheme in all other respects, by entering into a s106 or unilateral undertaking.

Sustainability

- 7.57 Policy H5 (Standards for New Housing) requires that all new build housing integrate additional measures for sustainability.
- 7.58 The submission indicates possible sustainable and energy efficient measures that would be used to reduce carbon emission and a building's carbon footprint; however, none have been specifically proposed.
- 7.59 Should the application have otherwise been recommended for approval, conditions would have been recommended to ensure the development meets the following requirements:
- Higher water efficiency standards of 110 litres per person per day; and
 - A 19% improvement over building regulations energy requirements
- 7.60 Although secured by planning condition, these new requirements would have been administered through the Building Regulations, with confirmation of compliance submitted to the LPA to discharge the condition.

Contaminated Land

- 7.61 Policy EN16 (Pollution and Water Resources) required that developments on land affected by contamination can be satisfactorily managed or remediated against so that it is suitable for the proposed use.
- 7.62 The site has the potential to have caused contaminated land e.g due to oil spills, storage of hazardous materials. The proposal could introduce new pollutant linkages between contaminated land and sensitive receptors at the site. Should the application have otherwise been supportable, 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 being pre-commencement).

Other Matters Raised in Representation

- 7.63 The material planning considerations have been addressed in the report above.
- 7.64 Land/property value is not a material planning consideration.
- 7.65 While the concerns of the local residents in terms of the disruption including noise, light pollution and traffic implications that may be caused by the construction works are noted, it is not the planning system's role to obstruct development on this basis. Inevitably, any construction works may lead to some temporary disruption. Ordinarily, the requirements of Environmental Health legislation would seek to limit any harm so far as reasonably practicable. The proposal is for a residential development and is unlikely to result in a significant increase in noise and pollution. Moreover, should the application have been recommended for approval a condition would have been attached requiring the need of a construction method statement to be provided prior to commencement of works to minimise any such disruption, as well as an hours of works condition.

Equalities Impact

7.66 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.

8 Overall Planning Balance and Conclusion

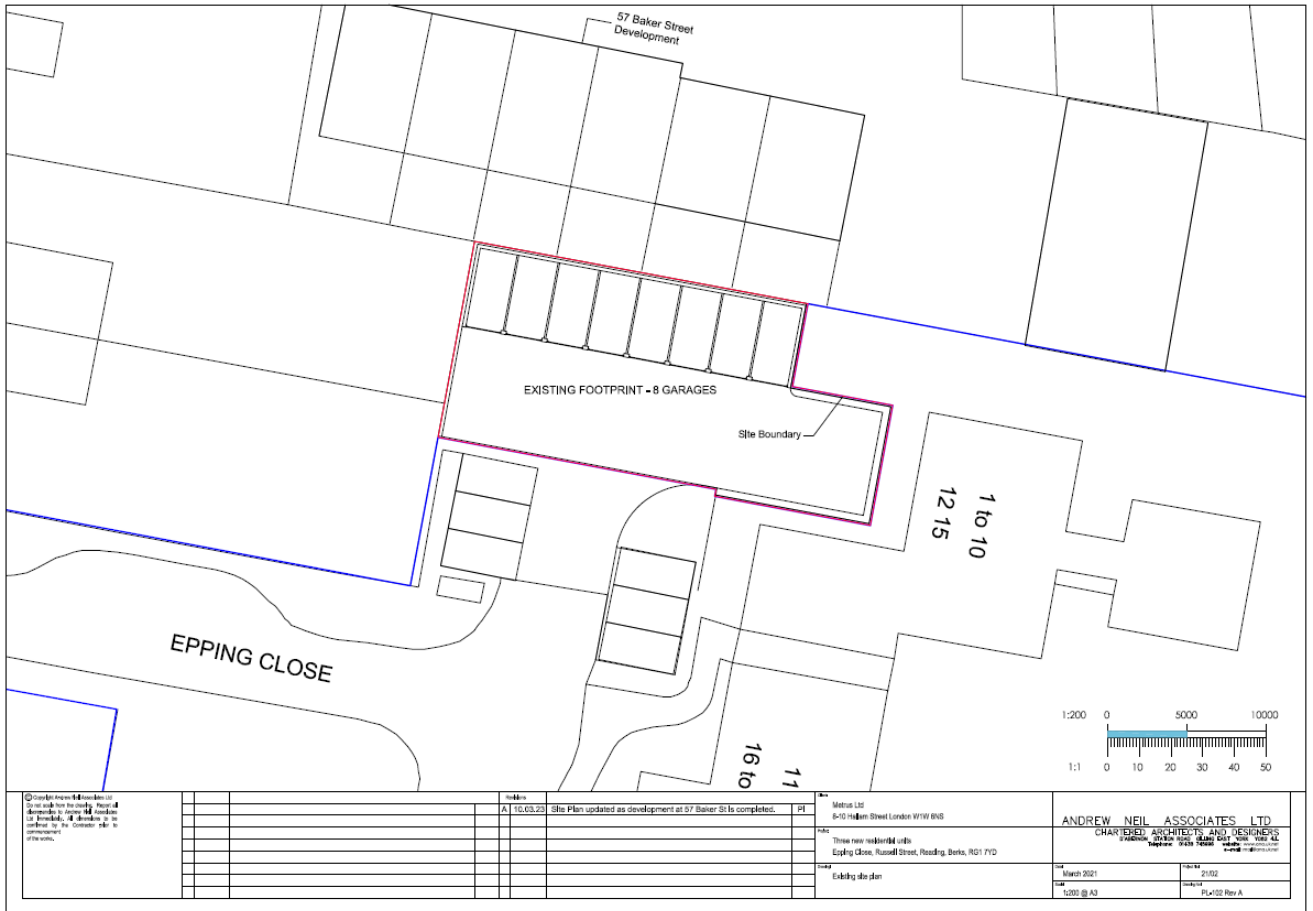
8.1 It is acknowledged that there would be some planning benefits associated with the proposed development, such as the provision of two additional residential dwellings to assist with the Borough housing targets. However, these are general benefits and not specific to the site and are likely to be delivered elsewhere. In contrast there are considered to be a number of significant harms arising from the scheme such as the scale and detailed design deficiencies and the loss of trees and greenery which result in the proposals being harmful to the character and appearance of the Conservation Area. In addition, there are significant concerns over some elements of the quality of accommodation proposed for future occupiers, as well as the harm to the living environment of existing neighbouring occupiers. Furthermore, the impact on parking/highways and the ecology of the site are further areas of harm identified.

8.2 In weighing up the planning benefits of the proposals (largely limited to the introduction of two additional units to the housing stock in the borough,) versus the harms arising from the scheme (as detailed at length in the officer assessment above), it is considered that the harm identified is not outweighed by the benefits by a significant margin. Having regard to the material considerations and all matters raised, the Local Planning Authority considers that the balance of considerations therefore weighs firmly against the proposal, and planning permission is recommended to be refused as set out in the recommendation at the head of the report.

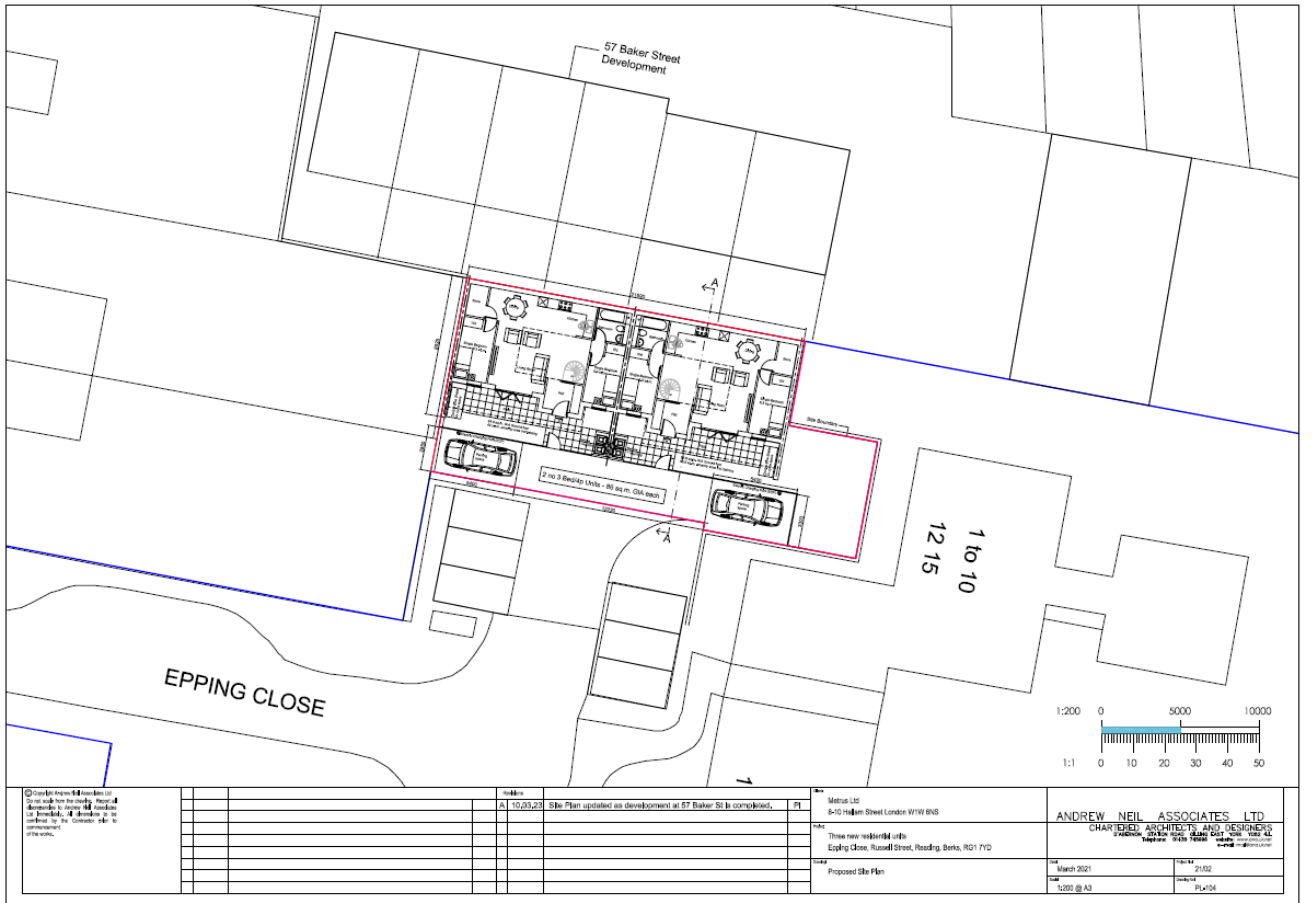
Case Officer: Ethne Humphreys

Plans Considered:

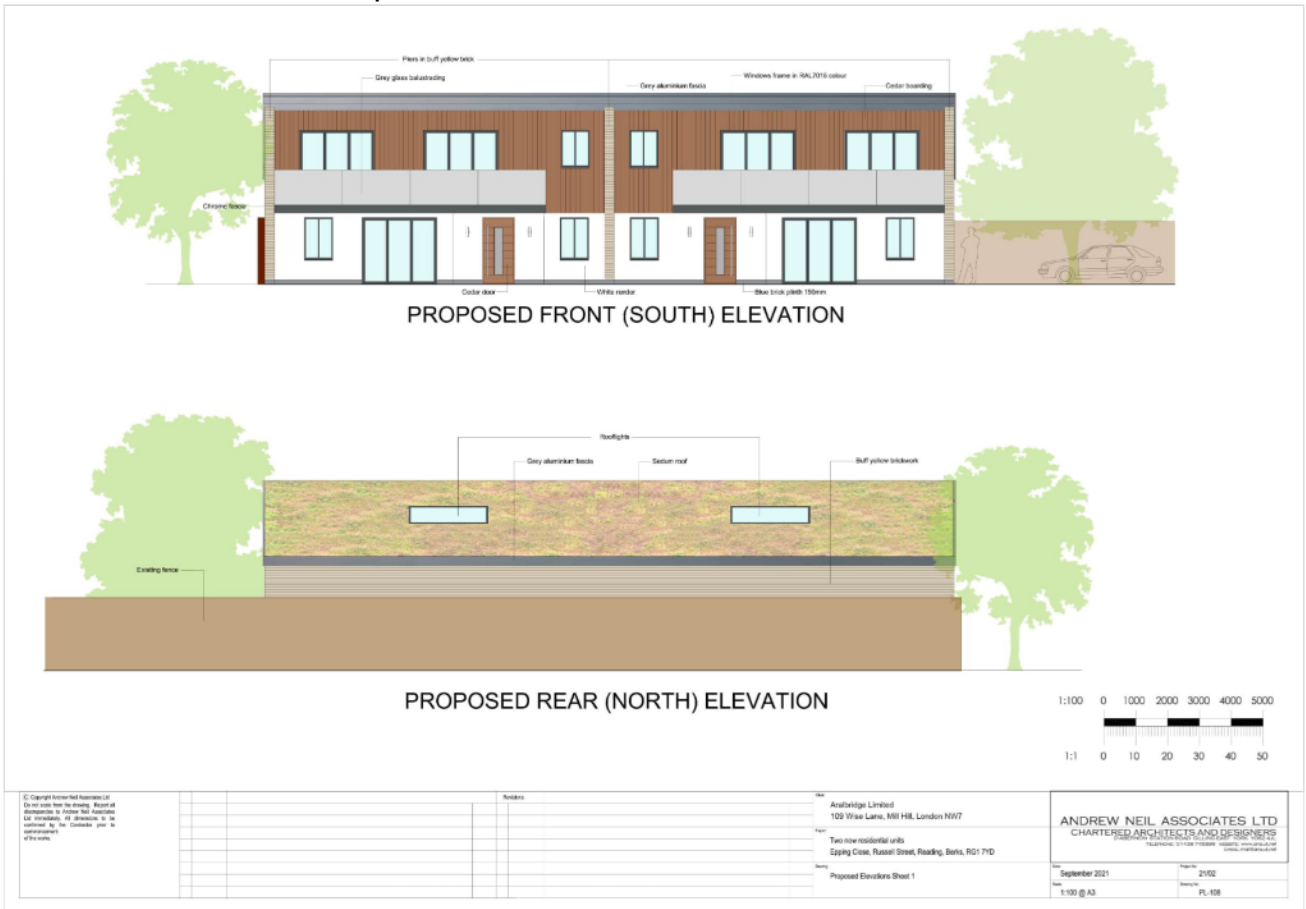
Existing Site Plan



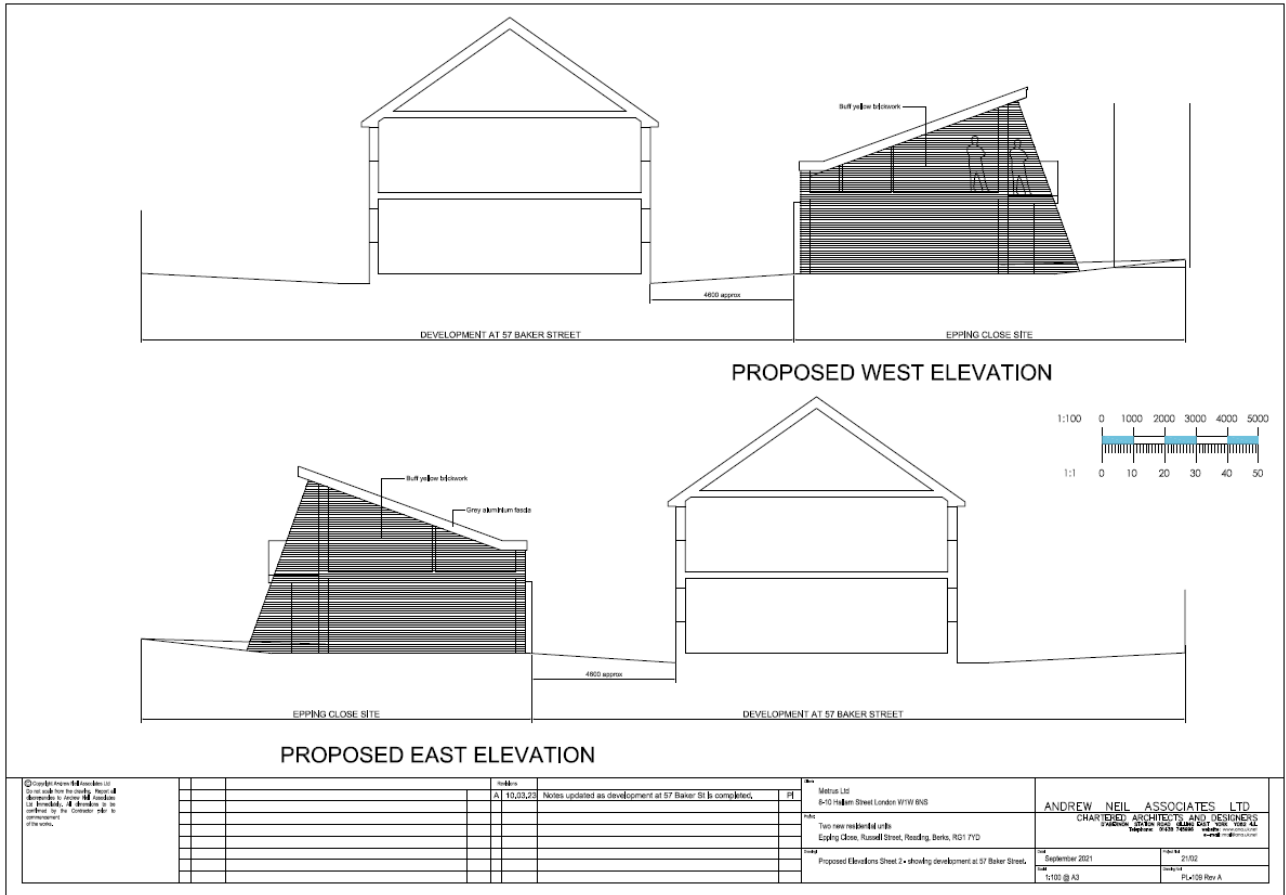
Proposed Site Plan



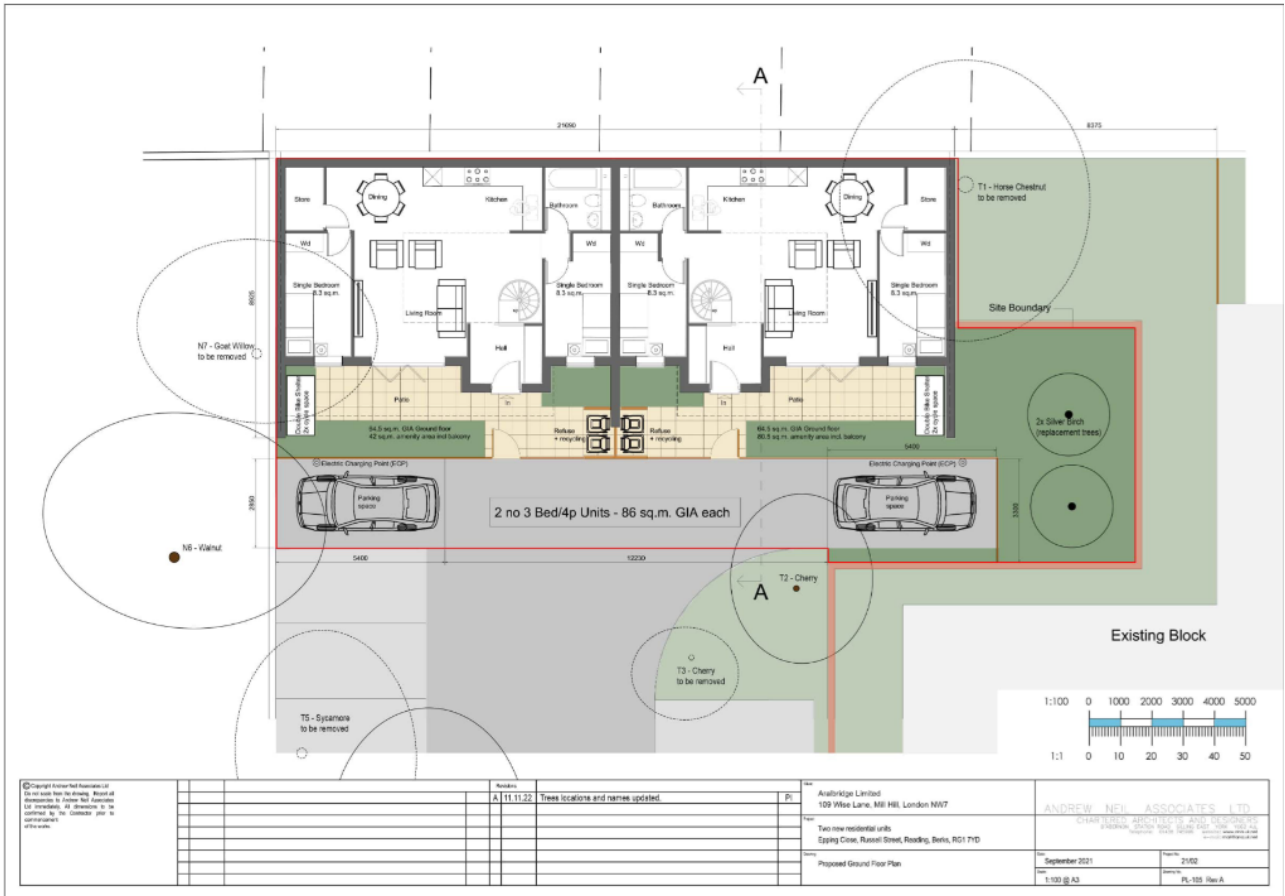
Proposed North and South Elevations

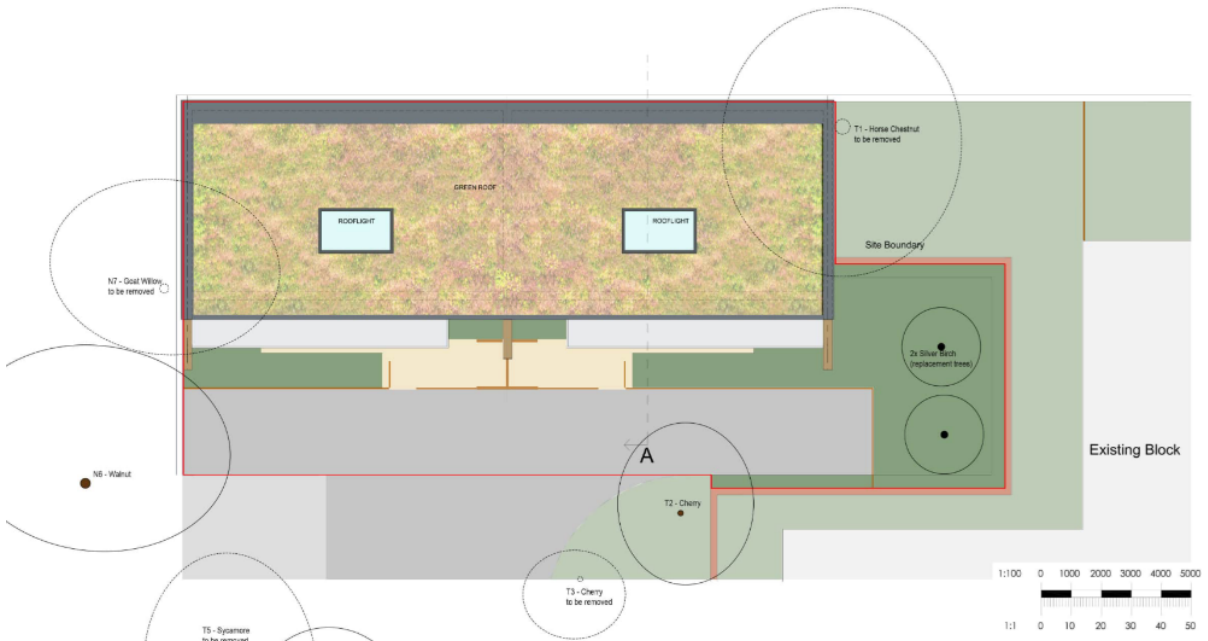


Proposed East and West Elevations



Proposed Ground Floor Plan





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	Date: September 2021 Scale: 1:100 @ A3	Drawing No: 2102 Title: PL_107_Roof A	