

4 September 2024



Reading
Borough Council
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Title	PLANNING APPLICATION REPORT
Ward	Emmer Green
Planning Application Reference:	PL/24/0403
Site Address:	Brindles, Kidmore End Road, Emmer Green, Reading, RG4 8SH
Proposed Development	Erection of 9 dwelling houses including alterations to the existing property
Applicant	Knole Homes
Report author	Thomas Bradfield
Recommendations	<p>REFUSE full planning permission for the following reasons:</p> <ol style="list-style-type: none">1. The proposal would result in an adverse effect on road safety and the free flow of traffic because the access road would fail to accommodate the traffic which would be generated by the proposed development due to its substandard width, the lack of footway into and through the site and the inappropriate position of on site turning provision. The proposal would therefore fail to comply with Local Plan Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway-Related Matters) of the Reading Local Plan 2019 or Paragraphs 114, 115 and 116 of the National Planning Policy Framework (December 2023).2. The proposal would fail to positively contribute towards the character of the area due to the cramped nature of the proposals which fail to allow for appropriate spacing between buildings, the site boundary and between buildings within the site. The proposals do not represent a suitable layout and would be an overdevelopment of the site. The proposals are therefore not considered to comply with Local Plan Policies H11 (Development of Private Residential Gardens) or CC7 (Design and the Public Realm) or Paragraphs 72, 128, 135 and 139 of the National Planning Policy Framework (December 2023).3. The proposal would fail to provide acceptable living conditions for future residents, due to the inappropriate layout of the scheme resulting in a cramped development which does not provide adequate privacy for private amenity spaces, in particular for Plot 3. Furthermore, the proposal would fail to provide a minimum of 19% improvement in the dwelling emission rate over the target emission rate or appropriate water efficiency standards as required by Local Plan Policy H5. The proposals are therefore not considered to comply with Local Plan Policies H11 (Development of Private Residential

	<p>Gardens), H5 (Standards for New Housing) or CC8 (Safeguarding Amenity) or paragraphs 123, 135, 157 and 159 of the National Planning Policy Framework (December 2023).</p> <p>4. The proposal would result in harm to neighbouring living conditions as a result of the proximity of the built form to the southern boundary of the site, resulting in a loss of outlook and increased sense of overbearing to the properties at The Conifers. The proposal is therefore not considered to comply with Local Plan Policy CC8 (Safeguarding Amenity) or Paragraph 135 of the National Planning Policy Framework (December 2023).</p> <p>5. The application fails to provide adequate information relating to landscaping and tree retention, protection and provision, which results in a proposal which fails to make an acceptable contribution to the provision of green infrastructure and the character and appearance of the area. The proposal would therefore fail to comply with Local Plan Policies CC7 (Design and the Public Realm) and EN14 (Trees, Hedges and Woodland) or Paragraphs 135, 136, 180 and 186 of the National Planning Policy Framework (December 2023).</p> <p>6. The application fails to provide adequate information to demonstrate a biodiversity net gain on site, and would therefore be considered to result in a loss of biodiversity given the nature of the proposals. The application therefore fails to comply with Local Plan Policy EN12 (Biodiversity and the Green Network) and Paragraph 186 of the National Planning Policy Framework (December 2023).</p> <p>7. In the absence of a completed legal agreement to secure provision of a policy compliant financial contribution towards affordable housing, the proposals fail to adequately contribute to the housing needs of the Reading Borough, contrary to Policy H3 (Affordable Housing) of the Reading Borough Local Plan 2019, Policy CC9 (Securing Infrastructure), the Affordable Housing Supplementary Planning Document 2021, Planning Obligations Under Section 106 Supplementary Planning Document 2015 and Paragraphs 7 and 8 of the National Planning Policy Framework (December 2023).</p>
<p>Informatives</p>	<p>IF0 - Positive and Proactive Working (Refusal) I14 – Pre-app Advice was not sought and should be before and further application(s) submitted Plans refused S106 Reason to be overcome</p>

1. Executive summary

- 1.1. Officers originally considered that this application be brought to Planning Applications Committee due to the public interest in the scheme. Following discussions with the chair of the Committee, it was agreed that the scheme be presented. This is a minor application and would not usually be presented to planning committee.
- 1.2. Whilst the proposal would provide family housing and an acceptable affordable housing contribution, it would fail to provide acceptable levels of road safety due to the poor access, lack of pedestrian footways and inappropriate turning head. Furthermore, the

proposals would result in a cramped development, houses which represent a poor quality of accommodation, harm to neighbours, a lack of biodiversity net gain and a lack of information relating to landscaping and tree provision, retention and protection. The proposal is therefore recommended for refusal for the reasons set out above.

2. Introduction and Site Description

- 2.1. The site is 0.64 hectares in area and currently consists of a large plot containing a two storey detached house set in a large, open garden which extends to the south and west of the building. Access to the site is from Lyefield Court in the north-eastern corner of the site, which then adjoins Kidmore End Road further to the east. Lyefield Court is mainly a private road, with formal adoption (ie. maintained by the Council) commencing close to the junction with Kidmore End Road. The Lyefield Court drive itself is included within the red line of the application site (see plan below). The Lyefield Court drive is narrow, with traffic calming measures and single vehicle sections. Historically, the application site had numerous trees, however the majority of the trees on site were felled prior to submission of the application, although some hedging around the perimeter of the site has been retained.
- 2.2. To the south and east of the site are flats (The Conifers and Lyefield Court) which are a purpose-built retirement development restricted to over-55s. The Conifers faces directly towards the site in close proximity along the southern boundary. To the north is the former Reading Golf Course, an allocated site (CR1b) which is currently being redeveloped for residential following approval of permission 221312. To the west is Emmer Green Primary School.
- 2.3. There are three trees with Tree Protection Orders (TPOs), two Limes adjacent to the entrance from Lyefield Court and a Sweet Chestnut in the rear garden of the original house. The site is also in close proximity to two Green Links, part of the wider Green Network.



- 2.4. The site has the following planning history, which allows for the construction of two additional houses on the site:

08/00161/FUL	Planning permission for new house and garage
	Approved 30/10/2008 (implemented – foundations have been dug)
221294	Erection of new dwelling and garage
	Approved 22/12/2023

3. The proposal

- 3.1. The proposal seeks to erect nine houses, whilst retaining the existing property (Brindles), with some demolition of existing extensions to the property. The houses would be two storey and a mix of three, four and five bedroom detached and semi-detached properties. The houses would be a traditional style, brick built with half hipped roofs, brick headers, bay windows, tiled roofs and gables.
- 3.2. The access road would enter the site as existing from the north-eastern corner, proceeding to the west before turning south into a cul-de-sac, with the proposed houses orientated to face onto the road with gardens to the rear of each property.
- 3.3. The four and five bedroom houses would have a single garage with two driveway car parking spaces. The three bedroom houses would have two driveway parking spaces.
- 3.4. The applicant has agreed to a financial contribution towards Affordable Housing to be secured by s106 legal agreement if approval is agreed.
- 3.5. The applicant has submitted the following documents for consideration:
 - Tree Survey
 - Transport Statement
 - Indicative Landscape Plan
 - CIL form
 - Design and Access Statement
 - Planning Statement
 - Ecology Report
 - Existing and Proposed Plans
- 3.6. The proposals are eligible for a Community Infrastructure Levy (CIL) payment of £194,354.40 based on a net additional gross internal area of 1619.62sqm.

4. Consultations

- 4.1. The following comments were received from consultees:

RBC Transport

- 4.2. The Transport team objects to the proposals and recommend that the application is refused. The comments can be summarised as below, and are elaborated on later in this report:
 - The carriageway entering the site would not be of a sufficient width to accommodate the increase in number of additional two-way traffic flow. The width of the access road should be 4.8m to allow for this, which the proposal does not achieve (the drive is 3.6m - 3.9m wide, which is not proposed to be widened)
 - Given the increase in both vehicle and pedestrian movements as well as the existing on-site parking which occurs on Lyefield Court, a dedicated footway along Lyefield Court and continuing throughout the site would be required. This is particularly important given the nature of Lyefield Court and the Conifers as dedicated retirement communities.

- The turning head within the site is poorly sited and would require servicing vehicles to undertake long reversing manoeuvres to service all of the plots.
- Parking provision would meet the requirements of Reading's car parking SPD and appropriate levels of EV charging would be included.
- Cycle parking provision and a Construction Method Statement should be secured by condition, if approving.
- Overall the proposals would fail to provide suitable access, on site turning provision and footway provision, resulting in an adverse effect on road safety and the flow of traffic, in conflict with Policies TR1 and TR3 of the Local Plan.

RBC Planning (Natural Environment) Team

4.3. The Natural Environment Team objects to the proposals, with the comments summarised below, and elaborated on later in this report:

- The applicant pre-emptively felled 13 trees on site prior to submission of this application. The Natural Environment Team advised at the time that this was inadvisable and should be halted, but the trees were felled.
- Additional tree removal would be required by the development despite the significant pre-emptive felling, which has not been adequately justified. The trees are shown on the plans and would not be necessary to lose as they are located on the boundary of the site and within proposed garden areas.
- The Tree Survey fails to provide adequate information relating to the impacts on Root Protection Areas for several trees, protection of the trees during demolition and no preliminary Tree Protection Plan for the construction process is included.
- The proposal would include the planting of 25 trees which do not meet the aims of the adopted Tree Strategy in terms of diversity of species and would introduce non-native species. It would provide a net gain of 8 trees compared to pre-felling levels.
- The application does not provide sufficient information relating to other landscaping measures beyond tree planting, and no landscaping principles have been provided.
- Overall, the Arboricultural Impact Assessment (AIA) is not satisfactory and insufficient landscaping information has been provided. The proposals therefore fail to meet the requirements of Local Plan Policy EN14.

RBC Ecology

4.4. The Ecology team objects to the proposals and commented as follows:

- The ecology report is sufficient to demonstrate that the site is not suitable for bats, reptiles, badgers or other protected species. A condition is recommended to ensure that any clearance of vegetation or buildings should be undertaken outside of bird nesting season.
- The application was submitted prior to the mandatory Biodiversity Net Gain requirement, but still needs to address Local Plan Policy EN12 which requires a 10% increase.
- The application has failed to provide a Biodiversity Net Gain calculation as part of the application.
- Given the proposals will result in the loss of large areas of vegetated garden, a long hedgerow in the centre of the site and the removal of a number of trees to be replaced by buildings, an access road and hardstanding areas, it is likely that there would be an overall on site net loss. The proposal would therefore fail to comply with Local Plan EN12.

RBC Environmental Protection

- 4.5. Conditions relating to contaminated land, Construction Method Statement, Hours of Construction/Demolition and restricting bonfires on site are recommended should approval be recommended.

RBC Valuations

- 4.6. The applicant has provided sufficient information to demonstrate that the affordable housing contribution would be acceptable and would provide a policy-compliant provision in accordance with Policy H3 and the Affordable Housing SPD.

Thames Water

- 4.7. Thames Water raised no objections subject to conditions and informatives.

Public/local consultation and comments received

- 4.8. 63 neighbouring properties were consulted by letter and a site notice posted at the entrance to the site.
- 4.9. 35 separate letters of objection were received, and a petition with 36 signatures objecting to the scheme was also received.
- Loss of privacy and amenity for residents of The Conifers
 - Increase in use of the access via Lyefield Court would endanger elderly residents
 - Narrow access point would result in further danger to existing and future residents and result in traffic build up
 - There is a narrow section of carriageway approaching Kidmore End Road (3.8m)
 - Existing parking on Lyefield Court exacerbates the impacts of increased traffic
 - The junction with Kidmore End Road is already dangerous, and increased traffic would make this worse, especially when combined with the increased traffic from the Golf Club development
 - Loss of green space, trees and ecology

5. Legal context

- 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) - among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).
- 5.2. 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).
- 5.3. Accordingly, the latest NPPF and the following development plan policies and supplementary planning guidance are relevant:

National Policy – National Planning Policy Framework (NPPF) December 2023

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

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
EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland
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 (2021)
Sustainable Design and Construction (Dec 2019)
Parking Standards and Design (2011)

Other relevant documents

Reading Tree Strategy (2021)
Department for Transport (DfT) Manual for Streets (2007)

6. Appraisal

6.1. The main considerations are:

- a) Principle of Development
- b) Design and Layout
- c) Unit Mix, Housing Quality and Future Residents Amenity
- d) Neighbour Amenity
- e) Transport
- f) Landscaping and Trees
- g) Ecology
- h) Affordable Housing

a) Principle of Development

6.2. Local Plan Policy H1 sets out the need for housing in Reading borough.

6.3. Local Plan Policy H11 supports proposals for new residential development in private residential gardens, providing that:

1. *The proposal makes a positive contribution to the character of the area in terms of:*

- *The relationship of the existing built form and spaces around buildings within the surrounding area;*

- *A layout which integrates with the surrounding area with regard to the built up coverage of each plot, building line(s), rhythm of plot frontages, parking areas, and existing pattern of openings and boundary treatments on the site frontage;*
 - *Providing appropriate hard and soft landscaping, particularly at site boundaries. This includes features such as the variety of trees, hardstanding/lawns and hedges, etc;*
 - *Compatibility with the general building height within the surrounding area;*
 - *The materials and elevational detail. These should be high quality, and where appropriate distinctive and/ or complementary;*
 - *The arrangement of doors, windows and other principal architectural features and their rhythm between buildings.*
2. *The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking;*
 3. *The proposal includes access, which meets appropriate highway standards;*
 4. *The proposal does not lead to tandem development;*
 5. *The design and layout minimises exposure of existing private boundaries to public areas, and avoids the need for additional physical security measures;*
 6. *The proposal does not cause a significant detrimental impact to the amenity of adjacent and nearby occupants;*
 7. *The emphasis is on the provision of family-sized housing*
 8. *The development provides biodiversity net gain wherever possible, and would not have an adverse impact on biodiversity in terms of the fragmentation of blocks of gardens, which as a unit or in association with adjacent green space are deemed to make an important contribution to biodiversity and contribute to the green network;*
 9. *The proposal does not prejudice the satisfactory development of a wider area.*
- 6.4. The proposal would constitute residential development of an existing very large private garden. In principle, this type of development is considered acceptable where the criteria set out in the policy (1-9 as above) are met. The principle of additional residential development on this site has been established, given the two previous permissions for a total of two additional dwellings, which remain extant. However, the current proposals represent a significant increase in the amount of dwellings proposed on the site from a total of 3 to a total of 10. This increase in intensity of development must be assessed against the criteria set out in Policy H11, and is examined in detail in the relevant sections below.
- 6.5. A critical element of the proposals is the increase in the number of dwellings proposed on the site, with resultant implications for access to and from the development. Policy H11 specifically requires that access is provided which meets appropriate Highway Standards. In this case, the applicant has not provided any improvements to the access into the site, and relies solely on the existing access arrangements. Given the increase in activity as a result of the proposals, an upgraded access would be expected for a scheme of this nature. The necessary improvements to the access would undoubtedly alter the character of the area, particularly along Lyefield Court, reducing verges and removing trees, which would be unlikely to be acceptable. Access to the site is an integral part of any proposal, and the scheme does little to address this critical issue, rendering the site unsuitable for this scale of development.

b) Design and Layout

- 6.6. Local Plan Policy CC7 states that, *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*. The NPPF states

that planning policies and decisions should ensure that developments, “*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*”.

- 6.7. Local Plan Policy H11 requires new residential development on private gardens to make a positive contribution to the character of the area as set out in paragraph 6.3 above.
- 6.8. The proposal would partially demolish the existing house and erect nine additional houses on the site, accessed from the existing access point in the north-eastern corner. The design of the individual houses would be traditional in nature, with brick the predominant material, hipped roofs and front gables. Many of the houses would have single storey elements to the side and rear with dormer windows to provide additional space in the roof areas. The design of the new houses themselves would be generally appropriate in this location, and would complement the character of the area. The partial demolition of the extensions of the existing house would not unbalance the property and it would remain in keeping with the surrounding area. The site is adjacent to a school to the west, and would retain an appropriate distance from the boundary in this regard.
- 6.9. The layout of the properties would, however, be somewhat cramped, with narrow spacing between Plots 5, 6, 7/8 and 9 on the western side of the access road and between plots 3 and 4 on the eastern side. In particular, the inclusion of the two semi-detached properties (Plots 7 and 8) on the eastern side of the access road would aggravate the cramped nature of this part of the site and would not be characteristic of the nature of the wider area. The proximity of Plots 4 and 5 to the southern boundary (between 1.6m and 2.9m) would exacerbate this uncomfortable relationship, especially when viewed in the context of the set off to The Conifers from this boundary to the south (6m at closest point).
- 6.10. The relationship between Plots 1, 2 and Brindles with Plot 3 is also an indication of the cramped nature of the proposals. All three properties overlook the garden of Plot 3 from distances ranging from 5.7m to 10.5m. The impact of this on the quality of the amenity space of Plot 3 is discussed later in this report, but does indicate that the proposed layout would appear cramped and overdeveloped.
- 6.11. Overall, whilst the design principles of the individual properties would be acceptable, but overall the proposal would fail to make a positive contribution to the character of the area. The scheme would not have an appropriate relationship with the existing built form in the surrounding area and the development would exceed the capacity of the site, resulting in inappropriate spacing and setting around buildings and amenity space. The proposal is therefore not considered to comply with Local Plan Policies CC7 or H11.

c) Unit Mix, Housing Quality and Future Residents' Amenity

- 6.12. Local Plan Policy H2 states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan, in particular for family homes.
- 6.13. Local Plan Policy H5 states that new build housing will need to comply with the nationally prescribed space standards, meet water efficiency standards, achieve a minimum of 19% improvement in dwelling emission rate and be accessible. Policy H10 requires dwellings to be provide with functional private or communal open space where possible. Homes should also have adequate natural light, outlook and privacy.
- 6.14. Local Plan Policy H11 requires this type of development to provide appropriate amenity space, have a focus on family sized housing and ensures appropriate residential amenity.
- 6.15. The proposals would produce an additional nine family sized houses. This would meet the aims of Policy H2 and H11 in terms of its focus on family sized units. All units and room sizes would also comply with the nationally prescribed space standards as required by Policy H5.
- 6.16. Spatially, the relationship between proposed units within the site is unacceptable in terms of Plots 1, 2, Brindles and Plot 3. The three north-facing properties would look directly

over the entirety of the garden of Plot 3, with the closest point only 5.7m away from the boundary. The full length of the garden of Plot 3 is compromised in terms of privacy, and this is exacerbated by the lack of information relating to landscaping (see later discussion). Even with landscaping, the garden would not be sufficiently private, and would fail to provide an appropriate level of residential amenity as required by Policies H11 and H5.

- 6.17. Policy H5 sets out sustainability requirements for new build residential developments, as set out in paragraph 6.12 above. The submission is silent on both water efficiency standards and dwelling emission rates. Without this information, it is not possible to assess whether the proposals would meet these standards. The proposal therefore fails to comply with this element of the policy. Whilst this matter could be the subject of pre-commencement conditions if otherwise approving, in this case officers advise that it should form a contributory reason for refusal.
- 6.18. Overall, whilst the unit mix is acceptable, the proposals would fail to provide acceptable levels of privacy and amenity space for future residents, and do not address the sustainability requirements of Policy H5. The proposal is therefore not considered to provide appropriate quality housing or acceptable living standards for future occupiers.

d) Neighbour Amenity

- 6.19. Local Plan Policy CC8 of the Reading Borough Local Plan states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties.
- 6.20. The nearest residential properties to the site are directly to the south, at The Conifers, which comprise a two storey (with further units in the roof) block of flats. It is part of a wider over-55s residential development which includes Lyefield Court to the east. A number of flats directly overlook the application site, with a distance of between 6m and 13.2m from The Conifers to the boundary of the site.
- 6.21. The relationship between Plot 5 and the western end of The Conifers is very uncomfortable, given the proximity of the two buildings at approximately 8m. The lack of set off from the boundary not only makes the development appear cramped as discussed above, but also has an unacceptable impact on the outlook from the units at the eastern end of The Conifers. Given the proposed height of the proposals, combined with the orientation, it is not considered that there would be any loss of light, but the proximity of the proposed unit would result in an unacceptable loss of outlook and an increased sense of enclosure.
- 6.22. The proposals would result in an increase in activity at the site, with a likely increase in noise for the nearby residents. Given the nature of the proposed use, it is considered that any increase would not be so significant so as to be materially harmful to residents' amenity.
- 6.23. Overall, the proposals would result in harm to the living conditions of the neighbouring residents through a loss of outlook and an increased sense of enclosure due to the proximity of the proposals to the southern boundary. The proposals are therefore not considered to comply with Local Plan Policies CC8 or H11.

e) Transport

- 6.24. Policy TR1 of the Local Plan requires developments to promote and improve sustainable transport. Policy TR3 states that consideration will be given to the effect of a new development on safety, congestion and the environment. Proposals should provide acceptable access to the site and ensure that there would not be a detrimental impact on the functioning and safety of the transport network. Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

- 6.25. The site is within an edge of suburban area, with a single access from the main highway (a dead-end). The scheme would be accessed from the existing access onto Lyefield Court (drive), a private road within the application site which links onto Kidmore End Road. Lyefield Court (drive) provides access from Kidmore End Road to a residential development at Bell Court as well as the retirement community within Lyefield Court itself as well as The Conifers and the application site. Lyefield Court (drive) is narrow in places, with areas for informal on-street parallel parking. The access into the application site is between 3.6m and 3.9m wide.
- 6.26. The Highway Authority advises that proposed scheme would result in a significant increase in traffic movements above both the existing situation and the applicant's fallback position of a total of three houses on the site. Given this, access into the site would need to accommodate the increase in additional two-way traffic flows. This would necessitate a minimum access road of 4.8m in width, as per the Manual for Streets (MfS) requirements. There may be some scope for a short passing place at some point along Lyefield Court, however, nothing of this nature has been presented as part of the application. The Transport Team's concern is that the scheme does not include any proposals to undertake works to widen the carriageway to allow for appropriate access despite the majority of the carriageway being in the applicant's ownership. The Highway Authority considers that the current access road is considered unsuitable to service the proposed increase in traffic movements due to its substandard width, resulting an adverse effect on road safety and the free flow of traffic.
- 6.27. The proposal would result in an increase in both vehicle and pedestrian movements, and MfS standards requires a dedicated 1.2m wide footway on Lyefield Court (drive) would be required from the culmination of the existing footway to the entrance of the site to allow for safe pedestrian access into the site. The footway would also be required throughout the site to allow for safe access to the proposed houses. The application documents are unclear as to the status of the proposed road within the site in terms of pedestrian safety and suitability. The existence of the neighbouring retirement properties increases the likelihood of people with disabilities or cognitive difficulties traversing the area, enhancing the need for safe pedestrian access around and into the site. The application does not provide any footpath or pavement pedestrian access to or within this site. Given the lack of footway provision, it is considered that the proposal would fail to meet Local Plan Policies relating to vehicle and pedestrian safety, and when combined with other access and safety concerns would result in a scheme which would compromise road safety.
- 6.28. The applicant has included a turning head adjacent to Plot 9 in the northern part of the site. However the size and configuration of this is insufficient and would result in service vehicles, e.g. refuse lorries, delivery vehicles and emergency vehicles having to undertake long reversing manoeuvres to service the other plots, particularly Plots 4 and 5. Extensive reversing by servicing and delivery vehicles would result in significant highway/pedestrian safety issues and is considered unacceptable.
- 6.29. Further assessment regarding access, pedestrian footway provision and turning space may be provided in the update report.
- 6.30. Car parking provision is considered acceptable, and EV charging points would be provided. Cycle parking would be secured by condition should approval be forthcoming.
- 6.31. The proposals would result in significant harm to road safety and the free flow of traffic through the lack of an appropriate access which would fail to adequately service the proposed development, the lack of safe pedestrian access and a poorly located turning head which would exacerbate the road safety issues within the development. The proposal is not considered to comply with Local Plan Policies TR1 or TR3.

f) Landscaping and Trees

- 6.32. Policy EN14 seeks to protect existing trees and improve Reading's vegetation cover. New development should make provision for tree retention and planting within the application site to improve the level of tree coverage within the Borough and ensure that new landscaping is provided. Measures should be put in place to ensure trees are adequately

protected during construction and maintained. Policy CC7 requires new development to make a positive contribution towards green infrastructure and landscaping. The Tree Strategy prioritises tree retention, protection and planting on development sites, in line with its objectives.

- 6.33. The site contains three protected trees, which would be retained as part of the proposals. The site did have extensive tree cover, which was removed prior to submission of this application. This was evident in the tree survey submitted with application 221294, which identified 31 individual trees, 5 groups of trees and 1 hedge. The current tree survey lists 18 individual trees, 4 groups of trees and 1 hedge, so it is evident that 13 individual trees and 1 group of trees were removed prior to submission. The pre-felling position should be considered the baseline for tree provision on site.
- 6.34. The proposal would remove three additional trees (T8, T9 and T10) from the area in the rear garden of Plot 4 and a mixed boundary hedge (G20) from the rear boundary of Plots 6 – 9. These trees are considered Category C trees and in themselves do not offer significant amenity value. The reasoning given is because of their proximity to new development. Given their position on the proposed plans, this does not appear to be accurate as each tree/hedge is some distance from proposed buildings. Although the trees are of low amenity value, the applicants have failed to demonstrate the necessity of their removal.
- 6.35. The proposed tree planting includes 25 new trees, which represents a net gain of 8 trees from the pre-felling levels. However, the proposed tree mix fails to meet the diversity requirements of Objective 2 in the adopted Tree Strategy and would introduce two non-native species, which conflicts with Objective 7 of the Tree Strategy which seeks new trees to be native, naturalised or to provide wildlife value. The applicant has failed to consider recommended separation distances when considering the location of Plot 5 in relation to the existing Category A Oak tree in the south western corner of the site.
- 6.36. The AIA fails to accurately plot the Root Protection Area (RPA) of the Sweet Chestnut in the south-eastern corner of the site, which is covered by a TPO. This is likely to result in future pressure for excessive pruning or even removal of the tree nearest to Plot 4 given the proximity of the proposed building to the incorrectly mapped RPA. The AIA also fails to provide any detail regarding the protection of trees during demolition, and no preliminary Tree Protection Plan.
- 6.37. No information has been provided with regards landscaping beyond tree planting. No indicative landscaping plan has been provided, and no Landscaping Principles have been provided, as would be expected for a scheme of this nature, especially where landscaping is crucial due to the loss of green space.
- 6.38. The applicant has failed to provide appropriate levels of tree planting or landscaping as part of the proposals, as required by Local Plan Policies CC7 and EN14. The layout is not sensitive to either existing or proposed trees or the necessity to create a suitably landscaped environment. The lack of information, combined with the inappropriate loss of trees and hedges without appropriate justification or mitigation and the inappropriate positioning of new trees would result in significant harm to the character and appearance of the area and would fail to meet the aims of the adopted Tree Strategy.

g) Ecology

- 6.39. Policy EN12 seeks to protect existing green space, ensure that there would be no net loss of biodiversity, and to demonstrate that there is a net gain for biodiversity. The site is close to two Green Links, part of the identified Green Network.
- 6.40. The applicant has submitted an ecology report which concludes that the on-site wildlife habitat is not suitable for protected species, although the report was carried out after the pre-emptive site clearance.
- 6.41. The application was submitted prior to the mandatory requirement for a 10% Biodiversity Net Gain uplift, but this is still a requirement of Local Plan Policy EN12. The applicant has provided no information relating to Biodiversity Net Gain. The proposals would result in

the loss and fragmentation of a large area of garden space, which likely to have good biodiversity value, to be replaced by houses, road, enlarged hardstanding/parking space and proposed much smaller gardens. No landscaping information has been provided to show what planting would be in the proposed garden spaces or what the contribution to biodiversity would be. It is therefore likely that the proposal would result in an overall on site net loss, and the applicant has provided no information to demonstrate whether this is or is not the case.

- 6.42. Without any information on how a Biodiversity Net Gain would be achieved on site, the proposal cannot be considered to comply with Local Plan Policy EN12, and is therefore considered to fail to provide a net gain of biodiversity and is highly likely to result in a net loss.

h) Affordable Housing

- 6.43. Local Plan Policy H3 requires development to make an appropriate contribution towards affordable housing to meet the needs of Reading Borough. For a scheme of this size, a financial contribution, calculated as 10% of the Gross Development Value (GDV) of the scheme.
- 6.44. The applicant has agreed to pay a contribution of £713,750 towards affordable housing, which has been agreed by the Council's Valuations Team as representing 10% of the GDV of the site and would therefore be policy compliant. The contribution would be secured by a legal agreement should approval be forthcoming, but as the officer recommendation in this case is for refusal, this would form a contributory reason for refusal.

7. Equality implications

- 7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.2. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

8. Conclusion and Planning Balance

- 8.1. As with all applications considered by the Local Planning Authority, the application is required to be determined in accordance with the development plan unless material considerations indicate otherwise, as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 8.2. The proposals would represent the redevelopment of a private garden to provide nine family sized houses, which would be of an appropriate design in terms of their design and would provide a policy compliant financial contribution towards Affordable Housing. However, officers consider that the road safety implications of the poor access, lack of pedestrian footways and inappropriate turning head combined with the cramped nature of the proposals, poor quality of accommodation, harm to neighbours, lack of biodiversity net gain and a lack of information relating to landscaping and tree provision results in significant harm which outweighs the benefits of the family housing provision and affordable housing contribution.
- 8.3. As such, this application is recommended for refusal.

Case officer: Tom Bradfield