

# Planning Applications Committee

03 June 2026



<b>Title</b>	<b>PLANNING APPLICATIONS REPORT</b>
<b>Ward</b>	Caversham
<b>Planning Application Reference:</b>	PL/26/0138/FUL
<b>Site Address:</b>	Hemdean House School, Caversham, Reading
<b>Proposed Development:</b>	Redevelopment and demolition of buildings, erection of 51no. retirement apartments and conversion of the former School House to form 10no. general open market apartments including communal facilities, access, car parking and landscaping. The conversion of former gate house lodge to form 1 no. general open market dwelling.
<b>Applicant</b>	Churchill Living Ltd
<b>Report author</b>	Ethne Humphreys, Principal Planning Officer
<b>Deadline:</b>	22 <sup>nd</sup> June 2026
<b>Recommendation</b>	<p>REFUSE planning permission for the following reasons:</p> <ol style="list-style-type: none"><li>1. In the absence of a completed legal agreement to secure the provision of an acceptable amount, mix and tenure of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough and the need to provide sustainable mixed and balanced communities. Contrary to Policies H3 (Affordable Housing) and CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the adopted Affordable Housing SPD 2021 and paragraph 64 of the NPPF 2024.</li><li>2. The proposed development fails to demonstrate that there is no need to retain the existing educational and community use of the site. Contrary to Policy OU1 (New and Existing Community Facilities) of the Reading Borough Local Plan 2019 and Para 100 of the NPPF 2024.</li><li>3. The proposed development, due to the excessive scale, site coverage and bulky form of buildings and associated development, together with their incongruent design and disjointed arrangement would represent an unattractive</li></ol>

and visually dominant overdevelopment of the site and loss of openness, which fails to accommodate buildings (including outbuildings), new accesses, bin stores, tree planting and other soft landscaping in a manner that enhances the character and appearance of the area. This harmful arrangement together with the visual prominence of the site would result in harm to the street scene and character of the areas. Contrary to Policies CC7 (Design and the Public Realm), H2 (Density and Mix) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Local Plan 2019 and paragraphs 96, 129, 131, 135 and 136 of the NPPF 2024.

4. The proposed development, due to the excessive scale and bulky form of buildings, combined with their siting and expansive areas of hardstanding would result in an overly dominant, visually stark, intrusive and unsympathetic development that would result in a harmful impact on the legibility of the original site layout and the visual and functional relationship between non-designated heritage assets within the site and their setting. As such the proposal would detract from the significance of the non-designated heritage asset at Hemdean House School and Lodge. Contrary to Policies EN1 (Protection and Enhancement of the Historic Environment), EN4 (Locally Important Heritage Assets), EN6 (New Development in a Historic Context) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraph 216 of the NPPF 2024.
5. The proposed development would involve and require unsympathetic alterations to the historic buildings Hemdean House School and Lodge including inappropriate fenestration and other materials which would result fail to conserve the character and appearance of these non-designated heritage assets with consequent harm to their significance. Contrary to Policies EN1 (Protection and Enhancement of the Historic Environment), EN4 (Locally Important Heritage Assets), EN6 (New Development in a Historic Context) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraph 216 of the NPPF 2024.
6. The proposed development would provide fail to provide dwellings of 3 bedrooms or more and as such would fail to adequately contribute towards meeting the identified housing needs of Reading Borough. Contrary to Policy

H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 61 and 129 of the NPPF 2024.

7. The proposed development, due to the inappropriate cramped building layout, single-aspect rooms combined with enclosure from trees and retaining structures, would result in a poor quality of accommodation in terms of outlook, daylight and sunlight. Furthermore, there would be insufficient defensible space between ground floor units and communal gardens areas. This arrangement would result in a poor standard of amenity for future occupiers. Contrary to Policies CC8 (Safeguarding Amenity), H5 (Standards for New Housing) and H8 (Residential Conversions) of the Reading Borough Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024.
8. The proposed development would fail to provide sufficient bin storage for all aspects of the development resulting in likely informal storage with associated visual harm and harm to the functioning of the site. This would be contrary to Policies CC5 (Waste Minimisation) and H5 (Standards for New Housing) of the Reading Borough Local Plan 2019.
9. The proposed development would provide insufficient garden space to serve the converted Hemdean House School and Lodge which combined with overshadowing from trees would fail to provide an adequate quality of outdoor garden space for future occupiers, harmful to their amenity. Contrary to Policies CC7 (Design and the Public Realm), H8 (Residential Conversions), H10 (Private and Communal Garden Space) of the Reading Borough Local Plan 2019, the Residential Conversions SPD 2023 and paragraphs 96, 135 and 187 of the NPPF 2024.
10. The proposed development, due to its excessive scale, height, fenestration, and proximity to No.126 Hemdean Road would result in harm to the amenity of this neighbouring property due to its overbearing effects and loss of privacy. Contrary to Policies CC8 (Safeguarding Amenity) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024.

11. The proposal fails to demonstrate that it would not result in harmful loss of daylight or sunlight to adjacent dwellings to the north of the site in Hemdean Road and Knighton Close. Contrary to Policies CC8 (Safeguarding Amenity) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024
12. The proposed development, by reason of its excessive scale, inappropriate siting and number and position of windows and balconies in close proximity to neighbouring properties and gardens to the north of the site on Knighton Close would result in actual and perceived overlooking and loss of privacy to those dwellings and their gardens with consequent harm to the amenity of neighbouring occupiers. Contrary to Policies CC8 (Safeguarding Amenity) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024.
13. The proposed development would involve an extended raised car parking area at the western end which due to its elevated position, extensive retaining walls and other associated works, and proximity to properties existing to the north of the site at Knighton Close, would result in an unneighbourly, overbearing and dominant arrangement exacerbated by disturbance from vehicle movement and other activity, with consequent harm to the amenity of neighbouring properties and their gardens to north of the site at Knighton Close. Contrary to Policies CC8 (Safeguarding Amenity) and H2 (Density and Mix) of the Reading Borough Local Plan 2019 and paragraphs 96, 135 and 198 of the NPPF 2024.
14. The duplication of vehicle access onto the classified Hemdean Road would be detrimental to highway safety. Contrary to Policies TR1 (Achieving the Transport Strategy) and TR3 (Access, Traffic and Highway Related Matters) of the Reading Borough Local plan 2019, the Parking Standards and Design SPD 2011 and paragraphs 109, 115 and 117 of the NPPF 2024.
15. The proposed development fails to provide a continuous pedestrian footway to serve the proposed dwellings within Hemdean House School and as such the proposal would fail to provide as safe, accessible and convenient pedestrian route contrary to Policies TR1 (Achieving the

Transport Strategy), TR3 (Access, Traffic and Highway Related Matters) of the Reading Borough Local plan 2019, the Parking Standards and Design SPD 2011 and paragraphs 109, 115 and 117 of the NPPF 2024.

16. The proposed development would provide insufficient parking to serve future occupiers, and which would result in on-street parking, the availability of which would be reduced by the proposed access) that would adversely affect road safety and the flow of traffic. Contrary to Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway Related Matters) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) of the Reading Borough Local Plan 2019, the Parking Standards and Design SPD 2011 and paragraphs 109, 115 and 117 of the NPPF 2024.

17. The proposed development will result in harm to trees of high amenity value including those subject to a TPO due to felling of those trees. Furthermore, the proposal fails to demonstrate that it would not cause unacceptable harm to trees of high amenity value shown to be retained, including those subject to a TPO. As such the proposal results in harm to trees and to the verdant, spacious and historic character of the site and wider environmental and visual quality of the area. Contrary to Policies CC7 (Design and the Public Realm), H2 (Density and Mix) and EN14 (Trees, Hedges and Woodland) of the Reading Borough Local Plan 2019, the Tree Strategy 2021 and paragraphs 135, 136 and 187 of the NPPF 2024.

18. The proposed development, in the absence of an acceptable landscape-led Sustainable Drainage Strategy fails to provide for sustainable drainage, with consequent harm in respect of attenuating localised flooding, achieving ecological benefits, securing linkages to the existing Green Network and integration with tree planting and landscaping. Contrary to Policies EN12 (Biodiversity and the Green Network), EN14 (Trees, Hedges and Woodland) and EN18 (Flooding and Sustainable Drainage Systems) of the Reading Borough Local Plan 2019 and the Sustainable Design and Construction SPD 2019 and paragraph 182 of the NPPF 2024.

19. The proposed development fails to make provision for appropriate open space to serve the needs of the

	<p>development. Contrary to Policy EN9 of the Reading Borough Local Plan 2019 and paragraphs 98 and 103 of the NPPF 2024.</p> <p>20. The application fails to demonstrate that 5% of the new build dwellings will meet the M4(3) standard of accessibility, contrary to Policy H5 (Standards for New Housing) of the Reading Borough Local Plan 2019.</p> <p>21. In the absence of a completed legal agreement to secure an appropriate financial contribution towards carbon off-setting in the Reading Borough, the proposed development would fail to adapt to climate change, achieve zero carbon homes standard and would not provide appropriate energy infrastructure. Contrary to Policies CC3 (Adaption to Climate Change), CC9 (Securing Infrastructure) and H5 (Standards for New Housing) of the Reading Borough Local Plan 2019 and the Sustainable Design and Construction SPD 2019 and Planning Obligations under S106 SPD 2015.</p> <p>22. In the absence of a completed legal agreement to secure an acceptable Employment and Skills Plan (or equivalent financial contribution), the proposal fails to contribute adequately to the employment, skills or training needs of local people with associated socio-economic harm. Contrary to Policy CC9 (Securing Infrastructure) of the Reading Borough Local Plan 2019 and the Employment Skills and Training SPD 2013 and Planning Obligations under Section 106 2025.</p> <p>Officers request that the Planning Applications Committee gives delegated authority to the Director for Planning, Transport and Public Protection Services to make changes to add or to remove the above reasons for refusal.</p>
<p><b>Informatives</b></p>	<ol style="list-style-type: none"> <li>1. Positive and Proactive Working – refusal</li> <li>2. Confirmation of refused plans and documents</li> <li>3. Reasons 1, 19 and 18 could be overcome by entering into a satisfactory s106 legal agreement or unilateral undertaking (UU)</li> <li>4. Biodiversity Net Gain requirements</li> </ol>

**1. Executive summary**

- 1.1 The report considers a planning application for the proposed redevelopment and demolition of buildings at Hemdean House School. It is proposed to convert the locally listed Hemdean House School and Lodge to open market units (10 flats Hemdean House School and 1 flat Lodge). A 3 storey building comprising 51 retirements units is proposed within the site along with new access from the site frontage.
- 1.2 The report identifies significant areas of harm including the failure to provide an acceptable amount and type of affordable housing; loss of the existing education and community use; harm to the character and appearance of the area including heritage assets and harm to trees of high amenity value. Various impacts on the amenity of neighbouring dwellings together with a poor standard of amenity for future occupiers within the site itself including a lack of open space provision has been identified. The access and parking and bin storage arrangements for all future users is not acceptable.
- 1.3 While the scheme delivers benefits such as housing provision and accommodation for older people, biodiversity net gain, sustainable construction, and some employment benefits, the report explains that these benefits are significantly and demonstrably outweighed by the identified harms and it is recommended that planning permission should be refused.

## **2. Introduction**

- 2.1 The application site is 0.88 hectare in size and comprises the vacant Hemdean House School to the west rear of the site, the Lodge building (occupied by a children's nursery) to the east front of the site and 9 ancillary buildings and playing fields within the site. The site is located on the west side of Hemdean Road (see location plan in figure 1 below).
- 2.2 The eastern end of the site fronting Hemdean Road starts relatively flat and contains the Lodge building, driveway access and playing field. However, there is a distinct change in topography of the site with the natural ground level rising to the west upwards towards the main school building. The grounds have been terraced and there is an embankment to the west of the playing fields rising to a level artificial hard surfaced and fenced games court. A further terrace rises above the court to classroom blocks and beyond that the remainder of the site rises steeply to the Victorian main 4 storey Hemdean House and the School's former administration offices.
- 2.3 Existing access is via a driveway from Hemdean Road rising alongside the terraced ground along the west of the site. There is a separate pedestrian footpath alongside the access driveway.
- 2.4 The site is characterised by a significant number of mature trees and other vegetation across the site, including some trees covered by Tree Preservation Order.

- 2.5 The Hemdean School House closed in July 2024. The Lodge building is occupied by PlayDay nursery.
- 2.6 The site is surrounded by residential properties to the north (Knighton Close), south (Hemdean Road and Hemdean Rise) and west (The Cloisters), with housing also on the east side of Hemdean Road.
- 2.7 Members are scheduled to undertake an accompanied visit to the site on 28 May 2026
- 2.8 The application is being report to PAC as a 'major' category planning application.



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Figure 1: Site Location Plan – not to scale



Figure 2: Aerial View – not to scale

### 3. The Proposal

- 3.1 Full planning permission is sought for the erection of a 3 storey building to serve as retirement flats, along with conversion of Hemdean House School and separate Lodge building to provide open market units following demolition of 9 buildings on site.
- 3.2 The new-build element would provide 51 Class C3 retirement apartments comprising 33 x 1 bedroom units and 17 x 2 bedroom units. The proposals also include ancillary communal indoor spaces, car parking, landscaping and associated infrastructure.
- 3.3 The conversion of Hemdean House School would provide 10 x 1 bedroom units and the conversion of the Lodge would provide 1 x 2 bedroom dwelling.

- 3.4 The existing access from Hemdean Road would be retained to serve the main Hemdean House School and Lodge and a new access proposed from Hemdean Road to serve the new-build retirement homes.
- 3.5 The external materials used in the new-build would comprise red and white brick with clay and slate-effect tiles.
- 3.6 It is proposed to replace existing windows of Hemdean House School and Lodge with uPVC windows.

#### Community Infrastructure Levy

- 3.7 In terms of the Community Infrastructure Levy (CIL), in accordance with the Council's adopted CIL Charging Schedule (2015) all new residential floor space is CIL liable. Existing floor space to be demolished can be off-set against the proposed new floor space subject to meet certain occupancy criteria. 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.

#### **Positive and Proactive Engagement**

- 3.8 With regard to the requirements of paragraphs 186-187 of the NPPF 2024, Reading Borough Council offer pre-application advice to seek to resolve problems before an application is submitted. No pre-application advice was sought prior to the submission of this application.

#### **4 . Relevant Planning History**

Extensive history, most relevant:

- 4.1 21/0431 Temporary planning permission for installation of modular nursery buildings for five years (Amended Description). Permitted.

#### **5. Consultations**

- 5.1 RBC Conservation Officer – Object, due to harm to non-designated heritage assets. Discussed below.
- 5.2 RBC Transport – Object, due to introduction of second access from Hemdean Road, insufficient parking provision, insufficient pedestrian footway. Discussed further below.
- 5.3 RBC Natural Environment – Object, due to removal of TPO trees, harm to trees to be retained, insufficient landscaping. Discussed further below.

- 5.4 RBC Education Services – Object, due to loss of nursery provision and growing pressure on places for younger children. Discussed below.
- 5.5 RBC Ecology Adviser – No objection subject to conditions to secure submission and approval of a biodiversity net gain plan and scheme of biodiversity enhancements prior to commencement of development, submission and approval of a wildlife friendly external lighting scheme prior to occupation of the development and to stipulate that vegetation clearance shall only take place outside of the bird nesting season.
- 5.6 RBC Environmental Protection Officer – No objection subject to conditions to secure noise assessment prior to installation of mechanical plant and conditions to secure construction method statement. Discussed below.
- 5.7 RBC Waste Services – Object, due to insufficient bin storage. Discussed below.
- 5.8 Environment Agency – No comments received.
- 5.9 Thames Valley Police Designing Out Crime Officer (DOCO) – Recommend a condition to secure an access and security strategy.
- 5.10 Berkshire Archaeology – No objection subject to conditions to secure submission and approval of a written scheme of archaeological investigation (WSI) prior to commencement of the development and to secure that the development shall then only take place in accordance with the approved WSI.

*Public Notification*

- 5.11 10 x site notices were also displayed around the site on 27<sup>th</sup> March 2026. The application was advertised in the local press.
- 5.12 110 letters of objection received, (some from the same property) concerns summarised below:
- Advertisements for the development in place
  - Cramped / dense nature of proposals
  - Loss of green space
  - Vehicles increased on roads / additional traffic / congestion
  - Insufficient parking for proposals
  - Removal of off-street parking bays
  - Pedestrian safety
  - Reduced air quality
  - Nursery open, not vacant as described
  - Loss of nursery / valued local facility and struggle for nursery places
  - Lack of childcare facilities
  - Height/ out of keeping / overly dominant/intrusive
  - Significant roof mass

- Incongruent design
- Block view of Hemdean House School
- Car headlight disturbance
- Overlooking / loss of privacy
- Loss of daylight / sunlight to gardens
- Loss of open outlook
- Impact on trees and wildlife
- Loss of TPOs
- Insufficient tree planting / landscaping
- Impact on local infrastructure and medical services
- Inequitable use of land – supporting 20 pre school children replaced for 1 dwelling
- Mischaracterisation / downplaying constraints / Inaccuracies in submission

5.13 Objections can be read in their entirety on the planning website.

5.14 An online petition with 607 signatures (correct at time of writing) has been received.

5.15 A letter has been received from Multi-Medix Holdings, the owner of the nursery, commenting on their lease arrangements with the nursery.

5.16 A letter has been received from Matt Rodda MP raising concerns summarised as:

- Traffic and Parking Issues
- Overdevelopment and Loss of Green Space
- Impact on Community Services – Nursery Provision
- Need for more Family Homes rather than Retirement

5.17 1 x letter of representation has been received from Caversham and District Residents Association (CADRA) who object to the application for the reasons summarised below:

- Harm to non-designated heritage assets
- Design out of keeping
- Massing overbearing
- Demolition of music practice rooms and conservatory
- Insufficient soft landscaping and specimen trees
- Harm to protected trees along frontage
- Loss of protected trees along frontage
- Harm to neighbouring residential amenity
- Loss of educational facility
- Nursery need
- Lack of marketing evidence
- SEND shortage
- Insufficient affordable housing/failure to meet housing need
- Increase in traffic
- New access resulting in safety hazard

5.18 1 x letter of representation has been received from Caversham Globe who object to the application for the reasons summarised below:

- Removal of trees of amenity value including TPOs on the Hemdean Road frontage
- Impact of car parking bays on tree root protection areas of frontage trees
- Insufficient tree planting
- Loss of parking spaces on Hemdean Road
- Height out of keeping and overly dominant
- Insufficient open space retained

#### Statement of Community Involvement

5.19 A statement of community involvement (SCI) has been submitted with the application which sets out the applicant's own consultation process with the local community before submitting the planning application. This details that the applicant set up a website 12<sup>th</sup> January to provide information on the proposals and allow for feedback to be provided online between 12<sup>th</sup> January and 18<sup>th</sup> January. The SCI details that 304 letters were posted 5<sup>th</sup> January to local residents providing background on Churchill living and the proposals and inviting feedback via the website.

5.20 The SCI details that 64 feedback forms were received.

5.21 The SCI details that local political representatives were sent email briefings 8<sup>th</sup> January and a meeting held with Caversham Ward Councillors 15<sup>th</sup> January.

5.22 The matters the applicant received set out in the SCI is summarised as follows:

- Overlooking/loss of privacy
- Buildings too tall/bulky/out of keeping
- Design does not respond to character/heritage context
- Loss of community buildings and nursery use
- Daylight/sunlight impacts
- Loss of trees
- Provision and usability of green/amenity space
- BNG and how landscaping would be delivered in practice
- Parking overspill into nearby streets and parking pressures
- Overlooking and glare from elevated car park levels
- Access and traffic circulation
- Traffic congestion and road safety
- Construction access and disturbance during demolition
- Increase in pressure local services
- Some support for retirement homes but poor design
- Query over proven local need for retirement living and existing provision nearby

## 6. Legal Context

6.1 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).

6.2 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).

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

6.4 National Planning Policy Framework (December 2024, as amended)

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

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 5 – Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

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

Section 16 - Conserving and enhancing the historic environment

6.5 National Planning Practice Guidance (2014 onwards)

6.6 Reading Borough Local Plan 2019 - Policies:

CC1: Presumption in favour of sustainable development

CC2: Sustainable design and construction

CC3: Adaptation to climate change

CC4: Decentralised energy

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

EN2: Areas of archaeological significance  
EN4: Locally important heritage assets  
EN9: Provision of open space  
EN10: Access to open space  
EN12: Biodiversity and the green network  
EN14: Trees, hedges and woodland  
EN15: Air quality  
EN16: Pollution and water resources  
EN17: Noise generating equipment  
EN18: Flooding and drainage  
H1: Provision of housing  
H2: Density and mix  
H3: Affordable housing  
H5: Standards for new housing  
H8: Residential conversions  
H10: Private and communal outdoor space  
TR1: Achieving the transport strategy  
TR3: Access, traffic and highway-related matters  
TR4: Cycle routes and facilities  
TR5: Car and cycle parking and electric vehicle charging  
OU1: New and existing communities

6.7 Supplementary Planning Documents:

Affordable Housing SPD (2021)  
Employment, Skills and Training SPD (2013)  
Planning Obligations Under s106 SPD (2015)  
Residential Conversions SPD (2023)  
Revised Parking Standards and Design (2011)  
Sustainable Design and Construction (2019)

6.8 Other relevant guidance/documentation:

Reading Tree Strategy (2021)  
Reading Biodiversity Action Plan (2021)  
Reading Open Space Strategy (2007)  
Historic England Good Practice Guide Note Number 2: managing significance in decision-taking.  
Principles of Conservation (Historic England, 2008)  
Reading Housing Needs Assessment 2024

6.9 Local Plan Partial Update

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

6.10 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5<sup>th</sup> November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. The submission draft of the Local Plan Partial

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

- 6.11 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.
- 6.12 Officer advice in respect of the Local Plan policies pertinent to these applications listed above is that, other than Policy H1 (Provision of Housing) they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’. Policy H1 is out of date because the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in National Planning Practice Guidance (NPPG) (as required now Policy H1 is out of date) or for the provision of Affordable Housing.

## 7. Appraisal

### Land Use Considerations

- 7.1 The National Planning Policy Framework (NPPF) (December 2024) sets out a presumption in favour of sustainable development (Para. 11) with three overarching objectives, economic, social and environmental. Sustainable development should therefore be approved where it accords with the development plan unless the adverse impacts of doing so would significantly outweigh the benefits of development. The NPPF also encourages the effective use of land by reusing land that has been previously developed; (Para. 124).
- 7.2 The NPPF has identified an increased need for housing across the country, including Reading Borough. In response to this, the emerging Reading Borough Local Plan Submission Draft 2025 includes provisions for an increased housing target in Reading.
- 7.3 In addition the National Planning Practice Guidance (NPPG) states that “*The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.*” Paragraph: 001 Reference ID: 63-001-20190626
- 7.4 NPPG Paragraph: 006 (Reference ID: 63-006-20190626) continues “*Plan-making authorities should set clear policies to address the housing needs of groups with*

*particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”*

- 7.5 Policy H6 sets out requirements for *“Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities.”*
- 7.6 The most up to date source of identified need is the Reading Housing Needs Assessment 2024. Paragraph 30 considers the need for specialist older person housing for older households in Reading over the 18 year period 2023-2041 and confirms there would be a need to provide an additional 665 specialist older person housing units in Reading (equivalent to an average of 37 dwellings per year). This represents 4% of the overall housing need identified for Reading and that 71% of which would need to be provided as affordable housing (discussed in more detail in the Affordable Housing section of this report below).

#### *Loss of Existing Use*

- 7.7 Under the current Reading Borough Local Plan 2019 the site is not allocated for development.
- 7.8 Emerging Policy CA1h (Hemdean House School, Hemdean Road) allocates the site for development as follows – this policy is not yet adopted:

#### *CA1h HEMDEAN HOUSE SCHOOL, HEMDEAN ROAD*

*Continued education and community use of the site, or, if no longer required for education, change of use and development for residential.*

#### *Development should:*

- Contribute to providing enhanced bus priority on Vastern Road exiting the northern station interchange;*
- Retain those buildings that make the most significant contribution of the character of the surrounding area;*
- Avoid adverse effects on important trees including those protected by TPO; and*
- Ensure appropriate back-to-back separation from existing residential. Site size: 0.93 ha*

#### *Continued education and/or community use, or 22-34 dwellings*

- 7.9 Given that this is a new policy, not in the current Local Plan and that the Local Plan update is not yet adopted, limited weight can be attributed to this emerging Policy at this time, albeit it indicates an anticipated direction of travel. As such, the

proposals must be assessed against Policy OU1 within the current 2019 adopted version of the Local Plan.

- 7.10 Policy OU1 (New and Existing Community Facilities) of the RBLP 2019 states that *“Proposals involving the redevelopment of existing community facilities for non-community facilities will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility”*.
- 7.11 The main Hemdean House School has been closed since July 2024. The applicant states that following marketing of the site, there was no interest from educational or community uses. However, no marketing evidence or marketing report has been submitted with the application to confirm or expand upon this.
- 7.12 It is also proposed to convert the gate lodge building to residential, which is currently occupied by the Play Day Nursery which accommodated 48 full time equivalent places. The applicant’s Planning Statement states that the nursery is *‘temporarily closed at the time of writing this statement’*. At the time of writing this report, the Nursery is occupied and in use.
- 7.13 Further to the above and with regard to the nursery, the Council’s Education and Children’s Services Team have confirmed support for its continued operation on the site to maintain continuity for children, families and staff and to reflect the current balance of supply and demand in the local early years market and that the Playday Nursery’s 48 full-time, year-round places make a crucial contribution to local childcare sufficiency. They advise that loss of this provision would result in a significant reduction in capacity in an area where recent closures and reductions have already limited supply.
- 7.14 A letter has been received from Multi-Medix Holdings, stating that they are the owner of the nursery and that the lease will expire in October 2026. The letter makes various claims regarding the future sale potential of the site. These are considered to be private matters between landowners and their lessees/tenants and have little bearing on the Planning use or merits of the current proposal.
- 7.15 There is a need for additional childcare in Reading as shown in the Reading Childcare Sufficiency Assessment 2022-2023 and it is a key priority for the Council to increase the supply of childcare in Reading to ensure that the market can respond to the growth in demand.
- 7.16 It is clear from public representation that the nursery is regarded as an important community facility, the strength of local opinion in favour of the retention of the nursery use is further evidenced by the supporting petition of with over 500 signatures specifically in respect of keeping the nursery open. No evidence has been submitted to demonstrate that the nursery use is no longer needed or why it is no longer viable and furthermore, the submission does not address how the nursery provision is being, or would be met, elsewhere.

- 7.17 With regard to the vacant school use, as above, the submission includes very limited or no details as to why education use of the main school building is no longer needed or why it is no longer viable.
- 7.18 Following on from the above it is of relevance that planning permission 21/0431 which secured temporary planning permission for installation of modular nursery building on the site noted that this was considered acceptable to “address the increasing demand for childcare places at the nursery”. It was considered that there was a “particular need for childcare places due to the closure of a childcare facility in the nearby Mapledurham ward” and that the local education authority needed to “ensure adequate provision and facilities are in place to meet this demand”. This was permitted on 10 August 2021.
- 7.19 It is considered, given the above, that the proposals fail to clearly demonstrate that there is no longer a need to retain the education facilities, both the school use and the nursery use. Conversely available evidence would suggest that there remains a clear need to retain the nursery facility. The proposals are therefore contrary to Policy OU1 of the Reading Borough Local Plan 2019.
- 7.20 The extent to which any material considerations outweigh the conflict with Policy OU1 is addressed in the planning balance and conclusion section at the end of this report.

*Principle of proposed use – age restricted retirement homes*

- 7.21 The new-build element would provide for Class C3 accommodation to be age-restricted recruitment living units. The development is intended for people aged 60 years and over (or those of 60 years and over with a spouse and partner of at least 55). The applicant outlines that the accommodation will provide “*older people with the aim of increasing choice and allowing people to live independently while having better access to care and support*” and “*encouraging independence in later life with suitably designed housing. Reducing reliance on residential and nursing care*”.
- 7.22 The provision of accommodation that allows elderly people to continue to live independent lives is broadly in line with Policy H6 (Accommodation for Vulnerable People) in particular in seeking to move away from institutional accommodation towards more independent living. The data provided by the applicant in relation to the number of older people who under-occupy homes in the Caversham area demonstrates that a considerable amount of family housing could be freed up in the local area. The applicant’s submission also evidences an aging population within Caversham within the past decade.

*Principle of proposed use – flats*

- 7.23 The conversion of the main school and lodge would provide 11 general open market dwellings. Provision of housing is acceptable in general and would align

with Para 61 of the NPPF 2024 which states that the Government's objective is to significantly boost the supply of housing and would contribute to the Borough's housing needs. It is acknowledged that the Council is not currently meeting its annual targets for provision of general housing as calculated using the 'standard method' (based upon local housing stock and affordability levels within the Borough) in National Planning Practice Guidance (NPPG) which is required now Policy H1 (Provision of Housing) of the Local Plan is considered to be out of date or for the provision of affordable housing.

7.24 However, as above, this is subject to the more detailed considerations of the relevant Local Plan Policies and the context of the application site and it remains important that the 'right' housing is provided in a manner which balances social, economic and environmental aims.

7.25 As above, the site is not allocated. However, in acknowledging the emerging site allocation Policy CA1h, this identifies an indicative residential development capacity of 22-34 dwellings. The proposal for 62 dwellings would therefore far exceed this indicative potential given for the site. The supporting text to the emerging Policy states:

*"where dwelling or floorspace figures are included alongside the allocations, these are intended as a guide, and usually reflect an indicative maximum capacity". It further states that "the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. The fact that a site is allocated in CA1 does not preclude the need to comply with all other policies in the local plan."*

7.26 Given the above, the proposals are not considered to be in line with current local plan policy or the emerging site allocation. The loss of the education and community use has not been justified, and the proposal fails to demonstrate that there is no 'need' for these uses. The general housing need should be given some weight and this will be discussed in the overall planning balance. The overall weight to be given to the harms identified and benefits will be considered at the end of this report.

### **Affordable Housing**

7.27 Policy H3 (Affordable Housing) requires developments to make an appropriate contribution towards affordable housing to meet the needs of the Borough. For the proposed development of 62 dwellings, the policy requires that 30% of the total number of dwellings shall be provided as on-site affordable housing and if proposals present an offer which falls short of the 30% policy requirement, then the applicant must clearly demonstrate the circumstances justifying a lower contribution through an open-book viability assessment.

7.28 There is a significant shortfall in provision of affordable housing with the Borough compared with the identified and persistent need. Paragraph 4.4.19 of the

Reading Borough Local Plan 2019 provides some background to the policy and summarises the large amount of evidence that the Council has in respect of the critical need for Affordable Housing that exists within the Borough:

*“The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA, 2016) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The SHMA identified a need for 406 new affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can.”*

7.29 Paragraph 4.4.23 states *““The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.”*

7.30 An up-to-date assessment of the need for Affordable Housing that exists in the Borough is within the supporting text for Policy H3 (para 4.4.21) of the Reading Borough Local Plan Submission Draft Partial Update May 2025 which states the following:

*“The Reading Housing Needs Assessment (HNA, 2024) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can”.*

7.31 Current Policy H3 includes provision for viability considerations at para 4.4.24 which states that *“...the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate, to the*

*satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement...*

- 7.32 The NPPF 2024 and the Council's policies allow for viability considerations to reduce the provision but only in specific circumstances. Paragraph 59 of the NPPF 2024 states that *"The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force."* In this instance, whilst the overall housing Policy H1 in the Local Plan 2019 is technically 'out of date' in terms of total housing numbers, the Affordable Housing Policy H3 is not considered out of date. This is evidenced by the 2024 Reading Housing Needs Assessment which confirms that there is no reduction in the critical need for Affordable Housing in the Borough and this supports the new policy in the emerging Local Plan which requires the same amount of AH as the current Policy H3. There is a strong consistent evidence base for the critical need for Affordable Housing and no evidence to suggest that the requirement is out of date or that the need has reduced.
- 7.33 With regard to Policy H3 (Affordable Housing), recent appeal decisions have confirmed that Policy H3 not out of date. In addition, it is considered that the existing Local Plan (2019), the emerging Local Plan (Submission Draft 2025) and the NPPF are all aligned in their overall objective of creating mixed and balanced communities including the delivery of an appropriate mix of housing types for the local community - which includes affordable housing (NPPF Para 63). The Local Plan Partial Update, which is currently at examination stage and has been through hearings does not change the fundamental approach of the policy in terms of making an affordable housing provision.
- 7.34 The existing Policy H3, the emerging Policy H3 and the aims of the NPPF in securing mixed and balanced communities through an appropriate housing mix are supported by and consistent with each other and the up-to-date Housing Needs Assessment 2024 which has re-confirmed the *"critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe"*. (HNA, 2024).
- 7.35 Paragraph 66 of the NPPF 2024 expects affordable housing to be provided to meet identified local needs.
- 7.36 Planning Practice Guidance (Paragraph: 008 Reference ID: 10-008-20190509) states that *"Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular*

*circumstances justify the need for a viability assessment at the application stage. Policy compliant in decision making means that the development fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.”*

- 7.37 The NPPG requires “*Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan; and the applicant should provide evidence of what has changed since then.*” An up-to-date viability assessment to support the emerging Policy H3 referenced above has been carried out for the emerging draft Local Plan Partial Update which supports the same level of affordable housing as previously set out in the current Local Plan 2019. The submitted viability assessment does not reference the viability assessment which informed either the existing or emerging local plan policies, and which are considered up to date.
- 7.38 Policy H3 places the onus on the developer/landowner to justify any lower affordable housing contribution. As above, the supporting text to Policy H3 refines this, explaining that costs need to be “*exceptional costs of bringing a site to market*”. It is considered that the types of costs referred to in the Local Plan relate to problems with a site itself; expensive reclamation, infrastructure costs, or high existing use values etc. The cost of a particular design, or design choices, is not considered to fall within this type of exceptional cost; unless the design options are so limited as to prejudice the site coming forward for development in general. It is also not necessarily the role of the LPA to insulate a developer against financial risk associated with downturns in the market or rising development costs.
- 7.39 In support of the application, a viability assessment has been submitted with the application, where the applicant asserts that the proposal cannot support a policy compliant contribution. Instead, the applicant’s offer is £345,000 which equates to 2.8% provision.
- 7.40 The viability assessment has been independently reviewed by Carter Jonas and the advice received is that it in fact **would be viable** for the development to incorporate a policy compliant contribution equivalent to 30% of the proposed number of new dwellings.
- 7.41 As above, the onus is on the developer to justify any lower affordable housing contribution. Advice received from Valuers is that the applicant’s Benchmark Land Value (BLV) approach has been incorrectly applied. The correct approach is to first establish an evidenced Existing Use Value (EUV) i.e. the value of the land in its existing use, (which is the first component of calculating benchmark land value) - and then apply a justified landowner premium to arrive at the BLV. However, in this instance the applicant has incorrectly calculated a BLV which has been primarily derived from an Alternative Use Value (AUV) scenario. With regard to this AUV, the applicant references a 27-unit scheme (with policy compliant affordable housing) to arrive at a BLV. This should not form the primary basis of the land value as it has no relationship to the current and lawful use of the site.

There are not 27 dwellings on site currently and therefore this cannot be claimed as the Existing Use. It is not considered that there is any evidence for the approach taken, and this is unjustified and unsubstantiated. The Council would ordinarily expect a robust assessment of the site's Existing Use Value to be provided. This would form the principal basis for establishing an appropriate and policy-compliant BLV in line with guidance including NPPG para 016 (ref 10-016-20190509). The applicant should have produced a BLV on the basis of an EUV and methodology – the onus remains on the applicant to justify a credible BLV at submission. It is also noted that the appraisal includes a number of abnormal and site-specific costs (for example demolition, ground conditions and other constraints). There do not appear to be any 'exceptional costs' inherent in the site which would indicate a reduction under the terms and guidance associated with Policy H3.

- 7.42 The overall conclusion from Valuers is that whilst the credibility of the applicant's proposed AUV hypothetical scheme hampers assessment, nevertheless, a policy compliant level of affordable housing could be supported.
- 7.43 The need for general housing (i.e not Affordable Housing) is a consideration; however, this it is not considered sufficient in and of itself to outweigh the harm that would result in terms of failure to meet the critical need for Affordable Housing within Reading Borough and the associated need to provide for sustainable and inclusive mixed and balanced communities. This remains subject to the overall planning balance discussed at the end of this report.
- 7.44 With regard to older persons' accommodation, the NPPG states that "*The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.*" Paragraph: 001 Reference ID: 63-001-20190626.
- 7.45 NPPG Paragraph: 006 (Reference ID: 63-006-20190626) *continues "Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period."*
- 7.46 Policy H6 sets out requirements for "*Other specialist accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities.*"
- 7.47 The most up to date source of identified need is the Reading Housing Needs Assessment 2024. Paragraph 30 considers the need for specialist older person housing for older households in Reading over the 18 year period 2023-2041 and confirms there would be a need to provide an additional 665 specialist older person housing units in Reading (equivalent to an average of 37 dwellings per

year) **of which 71% would need to be provided as affordable housing** (*emphasis added*). This excludes residential care need. The need for specialist older person housing represents 4% of the overall housing need identified for Reading and 71% would need to be provided as affordable housing.

- 7.48 Although the national picture is one of “critical need” for older persons’ accommodation. The objectively assessed need in Reading Borough is 37 dwellings per year – 4% of the overall housing need. This contrasts with the HNA assessment for 406 affordable dwellings to be provided per year. The need for older persons accommodation does not exist to the same degree as affordable housing. Furthermore, the fact that 71% of any specialist older person housing needs to be affordable further lessens the weight to be given to the current proposal (which provides no affordable housing on site).
- 7.49 The offer of 2.8% falls well below the policy requirement for 30% on site, or an appropriate contribution for off-site provision.
- 7.50 The existing Local Plan (2019), the emerging Local Plan (Submission Draft 2025) and the NPPF 2024 are all aligned in their overall objective of creating mixed and balanced communities including the delivery of an appropriate mix of housing types for the local community - which includes affordable housing (NPPF Para 63). When considering the relative weight to be given to the various benefits and harms identified, it should be in the context of this need for housing which meets identified needs. If there is a need to increase housing supply, it follows that this should also require an increase in affordable housing supply which is an intrinsic part of meeting the identified need. In fact, the need for Affordable Housing has been quantified precisely and objectively within the recent Housing Needs Assessment (2024), and this further demonstrated that the proportion of specialist housing for older people that needs to be affordable is even higher than the proportion of total housing.
- 7.51 There is therefore a demonstrated critical need for Affordable Housing in Reading including from specialist housing for older people. It is considered that the Council is justified in seeking to secure the provision of Affordable Housing for this development, subject to all relevant material considerations. Furthermore, a significant proportion of housing is provided relatively small sites within Reading due to its largely previously developed, urban, nature. There is therefore a need for each site to deliver a proportion of on-site Affordable Housing to avoid a shortfall against housing targets.
- 7.52 Failure to provide adequate affordable housing would fail to meet housing need and would have a direct impact on the availability of affordable housing for those in need of such housing. Given the “critical need” identified, it follows that the failure to provide affordable housing would result in a considerable degree of harm. This would be ‘absolute’ rather than ‘relative’ as the objectively assessed need is expressed in numbers of dwellings (and any associated shortfall in

provision). The relative nature of the viability assessment has no bearing whatsoever on the residual need experienced by persons in need of housing.

- 7.53 The question of viability relates to the likelihood of a particular development proceeding. In Planning terms within the 'plan-led system' there is a strong argument to suggest that allowing development to proceed in the short term without meeting identified need would simply serve to compound the harm by preventing the same land providing the necessary affordable housing in the event that the viability of the site improves over the course of the plan period (to 2036 in the case of the current Local Plan 2019 and to 2041 in the case of the emerging Local Plan Partial Update Submission Draft 2025). This is further evidence to suggest that the current proposal would fail to make the most appropriate and efficient use of the land resource. This situation both in isolation, and if replicated within other developments, would reduce the accessibility to appropriate housing within Reading. It is not considered reasonable to expect other developments to compensate for the shortfall in provision.
- 7.54 NPPG para 009 (Reference ID: 10-009-20251216) states that *"The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and viability evidence underpinning the plan is up to date, and site circumstances including any changes since the plan was brought into force, and the transparency of assumptions behind evidence submitted as part of the viability assessment. The decision maker should consider whether the assessment and its conclusions are objective, reasonable and realistic"*
- 7.55 The shortfall in the assessed contribution amounts to a clear conflict with the policy aimed at securing an appropriate contribution to affordable housing. Given the demonstrated critical need for Affordable Housing in Reading including for specialist housing for older people, significant and considerable harm is identified to the Borough as a result of the proposals providing insufficient levels of affordable housing. In this respect the development would fail to meet Policy H3 and the Affordable Housing SPD requirements and their associated aims of achieving mixed and balanced communities within the Borough. This significant harm would need to be weighed carefully against other material considerations including the wider benefits of the scheme if the proposals are to be considered acceptable. This is addressed within the overall planning balance at the end of this report.

### **Density**

- 7.56 The application site is 0.88 hectares in size, and the proposed development of 62 dwellings would deliver a development density of 70.45 dwellings per hectare. This density of development exceeds the '30-60 dwellings per hectare' density indicatively specified at figure 4.5 of Policy H2 (Density and Dwelling Mix) for suburban sites. Policy H2 is clear that the particular characteristics of a site will determine whether development density is appropriate. Given the concerns raised

in this report relating visual harm, and effect on amenity, the scheme is not considered to deliver an appropriate density for the constraints and circumstances of this particular site.

### **Dwelling Mix**

- 7.57 In terms of dwelling mix, Policy H2 requires that residential developments for 10 or more dwellings outside the central area and defined district and local centres will ensure that over 50% of dwellings will be of 3 bedrooms or more. Policy H2 also explains that the dwelling mix of residential development should contribute towards meeting the identified housing needs of the Borough. Figure 4.6 within the supporting text to Policy H2 sets out that there is most need within the borough for family sized units of two and three bedrooms.
- 7.58 The proposal is for 1 and 2 bed units (within both the new-build element and the conversions), with no 3 bed units proposed. However, no commentary has been provided as to the lack of 3 bed units, and no evidence has been supplied to justify deviating from the policy requirements which are based in evidence of local housing need. The proposals therefore fail to meet identified local housing need and are contrary to Policy H2 and the NPPF 2024.

### **Design Considerations and Impact on Character and Heritage**

- 7.59 Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments.
- 7.60 Policies EN1 (Protection and Enhancement of the Historic Environment), Policy EN4 (Locally Important Heritage Assets), EN6 (New Development in a Historic Context) and H2 (Density and Mix) seek to conserve, protect and enhance local heritage assets.
- 7.61 Paragraph 96 of the NPPF 2024 states that decisions should aim to achieve healthy, inclusive and safe places.
- 7.62 Paragraph 129 of the NPPF 2024 states that decisions should support development that takes into account the importance of securing well-designed, attractive and healthy places.
- 7.63 Paragraph 131 of the NPPF 2024 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

- 7.64 Paragraph 135 of the NPPF 2024 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.
- 7.65 Paragraph 136 of the NPPF 2024 details that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.
- 7.66 Paragraph 139 of the NPPF 2024 details that development that is not well designed should be refused.
- 7.67 Paragraph 216 of the NPPF 2024 states the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.68 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'.
- 7.69 The NPPF 2024 at para 207 requires "*That in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*".
- 7.70 It continues at para 210 "*In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.*"

7.71 The application site relates to the locally listed Hemdean House School and Lodge. It is proposed to convert both the main school building and the lodge to residential units, as well as construct a new building within the site to provide retirement accommodation along with new access, car parking and other ancillary buildings.

### New Build

7.72 The proposed building would be 3 storey in height and arranged in a 't' shape footprint, with the top of the 't' adjacent to and facing the site frontage with Hemdean Road. The existing character of the immediate surrounding area is typically one of two storey (with roof accommodation) inter-war and Victorian buildings. The site currently has a generous open frontage that accommodates a line of trees that are a landscape feature that contributes positively to the leafy character of the street scene at this point. This, combined with the set back in the majority of the built form on the site coupled with the largely single storey nature within the site contributes to the spacious character of the site. This also reflects the spacious character of the areas surrounding the non-designated heritage assets (main school house and lodge). Whilst the school building to the rear of the site is 4 storey in height, its siting and the topography of the site (it sits uphill to the rear of the site) means that it appears grouped with the surrounding residential dwellings to the south and west at this point. Giving the impression of a grand building with a substantial open landscaped setting between the road and the house. The original parkland setting is still readily discernible. Equally, given its significant set back into the site, the house sits comfortably within this context and does not appear as a dominant feature either within the site or within the Hemdean Road street scene.

7.73 The Planning statement states in respect of the new-build development that '*the scale is domestic*' and the Design and Access statement states that the proposals '*complete the Hemdean Road streetscene*'. This is not accepted and conversely it is considered that the combination of the footprint, height and unrelieved massing of the proposed new build would result in a visually prominent building, that would be uncharacteristic of the area and would result in a dominant form of development. Whilst set back to some extent from the road largely following the building line of adjacent properties, it would extend at 3 storeys for almost the entire width of the site, increasing the presence and visual prominence of development on the site viewed from the street. This would result in an overly dominant frontage that would be exacerbated by the amount of hardstanding proposed at the front of the site. The existing characterful open 'setting' described above and the way the site is experienced would be lost.

7.74 The apparent bulk would increase in oblique views where the depth of the rearwards wing would add to the already substantial bulk of the front wing which

is unrelenting in scale, form and appearance and adds to the excessively large, prominent and unsympathetic development. The height of the proposed building does not provide a sensitive response to the hierarchy of buildings in the surrounding area. In addition, the car parking/hardstanding proposed would result in a stark and unwelcoming frontage, that would not have a positive relationship with the street – worsened by the removal of tree of amenity value to provide new access. A substation is also proposed at the front of the site, immediately adjacent the road. This appears as an afterthought, poorly integrated and visually obtrusive and as such does not represent a good design solution.

- 7.75 The overall architectural approach does little to break up the mass of the building – the proposed ‘link’ only serves to exacerbate the overall scale – and contrasts with the more restrained character of the adjacent inter-war and Victorian era buildings.
- 7.76 It is unclear where the proposed development takes its design cues from – the Design and Access Statement states that the *“Hemdean Road elevation...will appear as a series of semi-detached / terraced properties, taking their architectural cues from the semi-detached and terraced properties on Hemdean Road”*. This is considered to be a somewhat abstract architectural reference as the surrounding buildings are of a smaller scale that are modest in both height and width. Conversely, it does not appear to either reflect local character or successfully reinterpret it in a modern way. Whilst the proposed materials would broadly reflect that used in the locality, the materials are not considered sufficient in themselves to create visually interesting buildings or to mitigate the shortcomings of the architecture. Indeed, the differing elements to the building in terms of roof forms and materials and overall asymmetrical nature highlights the awkwardness of the site layout and the incompatibility of the design with the character of the neighbouring properties. It would introduce a visually dominant building that would visually jar with the surrounding area. The proposed building is fundamentally at odds with the layout, scale and form of the character of the area.
- 7.77 With regard to the effect on the setting of the Lodge building to the front of the site, the excessive footprint, scale and bulk of the proposed new building would dominate visually and would overwhelm and subsume the Lodge. The proposals would also reduce and diminish the setting of the lodge, leaving it isolated and poorly integrated sitting within the remainder of its plot within the corner of a car park. Surrounded by Hemdean Road, the access road the proposed car park on all sides with the excessive scale building immediately in the background, this would result in a poor quality appearance that fails to integrate effectively with existing character and which is harmful to the setting of the non-designated heritage asset.
- 7.78 As above, the Listing for description Hemdan House School and Lodge states that *“Hemdean House School and Lodge, with their architectural and cultural*

*significance, constitute a group and remain important markers in the history of education and the built heritage of Caversham and Reading.”* For the above reasons the proposed development is not considered to respond sensitivity to its historic context.

- 7.79 It is apparent that the proposals comprise 3 separate elements. The new-build block of 51 retirement homes, the conversion of the main school house to 10 flats and the conversion of lodge to 1 flat. There appears to be no correlation between the proposals; indeed each element appears isolated from each other. The proposals do not relate to each other and there is no relationship between the new-build and the non-designated heritage assets. This results in a scheme that is disjointed and resulting in an awkward juxtaposition of separate elements. The proposals appear to be functionally ‘carved-up’ to allow for each element to exist separately without integrating together and within the site. The lack of integration continues with the land to the north west of the site edged blue on the location plan which would be severed from the site and the future use and access to it remains unclear.
- 7.80 The proposals require a large amount of retaining walls, particularly to the north and west of the site. This is reflective of the large amount of works required to keep the different elements separate from each other – and is a somewhat aggressive response to make the existing topography fit with the proposals, rather than the other way around.
- 7.81 Therefore, the development would fail to comply with Policy CC7 in that it would not be sympathetic to the character and visual quality of the area concerned, including the site’s spacious and verdant frontage. The proposal would also be contrary to paragraph 127 of the NPPF in that it would fail to positively contribute to local distinctiveness, the site’s sense of place and the existing streetscene; it would also fail to have due regard to the scale, layout, appearance and architectural detailing of the area and would have a poor relationship with neighbouring buildings and heritage assets. Finally, the proposals are also not considered to be visually attractive as a result of good architecture as required paragraph 135 of the NPPF 2024.
- 7.82 As above, the NPPF 2024 states that *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”* (Paragraph 130).
- 7.83 For these reasons it is considered that the proposal would be harmful to the character and appearance of the site and surrounding area. The effect of this harm will be discussed in the overall planning balance at the end of this report.

#### *Conversion of Lodge and School Buildings*

- 7.84 The Planning Statement states that *“The scheme takes the opportunity to enhance the immediate setting of the lodge whilst the proposed conversion and appropriate re-use of both of the buildings to residential accommodation presents a heritage benefit”*. As above, it is not agreed that the setting of the lodge is enhanced.
- 7.85 Whilst the development does not propose extensions to the Lodge or School buildings, both comprise external works that would not enhance or conserve the value of these non-designated heritage assets. This includes the replacement of original fenestration with upvc which is an inappropriate design and material; enlargements of window openings and no original openings left without intervention into the historic fabric.
- 7.86 Whilst there would be some modest improvements (demolition of lean-to brick extension, cleaning and repointing the brickwork and repair works for chimney and timberwork) the cumulative impact of the proposed works through inappropriate design, material and intrusion into historic fabric – that would result in harm to the buildings significance - would fail to preserve the historic and architectural interest of the buildings.
- 7.87 Historic England’s Advice note 7 states that local listing is a way to identify and celebrate historic buildings which enrich and enliven the area and that they build a sense of place and history and area intended to highlight assets in order to ensure that they are given due consideration when change is proposed. For the reasons given above, it is not considered that there would be an adverse impact on the historic assets.
- 7.88 With regard to the NPPF 2024, the harm would be less than substantial but is nevertheless considered to be of importance and weight. Paragraph 215 of the Framework establishes that any harm should be weighed against the public benefits of the proposal. This will be discussed in the overall planning balance.

### **Amenity Matters**

- 7.89 Policy CC8 (Safeguarding Amenity) seeks to protect the amenity of existing surrounding and future occupiers. Policy EN16 (Pollution and Water Resources) seeks to protect surrounding and future occupiers from the impacts of pollution, including contamination. Policy EN15 (Air Quality) seeks to protect existing and future occupiers from the impact of poor air quality. Policy EN17 (Noise Generating Equipment) seeks to control and mitigate noise impacts from plant equipment. Policy H10 (Private and Communal Outdoor Space) requires that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children’s play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with

private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.

*Existing Surrounding Residential Occupiers*

- 7.90 The site is bounded by residential properties on all sides, and the proposed new-build element would clearly result in increased presence and changed outlook.
- 7.91 Whilst clearly visible to the occupiers on the east side of Hemdean Road, given the intervening road and tree screening and set back, this is not considered to result in any harmful overbearing effects or loss of privacy.
- 7.92 With regard to No.126 Hemdean Road to the north, the proposed building would be sited approximately 6m to the common boundary and 7.8m to the building at No.126 itself. The proposed new building would extend at a height of 3 storeys or a significant distance along the boundary with No.126. This scale in close proximity is considered to be overbearing and visually dominant on this neighbour which is exacerbated by overshadowing due to the southward siting. Furthermore, 6 first and second floor windows are proposed facing No.126 and its garden area. The agent considers that given these would not be primary windows, that this would be acceptable at a distance of 7.8m. This is not accepted and it is considered that this number of windows at such close proximity would result in a overlooking and a strong perception of overlooking and associated loss of privacy. The proximity and excessive scale of the building at this point, combined with the number and arrangement of windows would result in harm to the amenity of occupiers of this neighbouring property.
- 7.93 With regard to houses to the south side of Knighton Close, the agent states that there would be a separation distance of 24.5m from the rear projection element to the back wall of these properties. Whilst this may be the case, there would be a considerably shorter distance to the rear boundaries and gardens – approximately 15m and the proposed balconies would be closer at approximately 13m. The proximity, number and arrangement of windows and balconies is considered to result overlooking, including a strong perception of overlooking. The effect of this would be exacerbated by the height of the building in that there would be two full storeys of accommodation above fence level that would overlook these neighbouring properties from an elevated position, the relatively constrained rear gardens of the Knighton Close properties, the open balconies and the general dominant 'presence' of the new building viewed from the neighbouring land.
- 7.94 The proposal includes a significant works including extensive retaining walls along the boundary with properties along Knighton Close, as well as within the site to the east and south of the new build element. This would appear overly dominant and visually intrusive especially in relation to adjacent properties in Knighton Close. The works would facilitate vehicle movements with associated noise,

movement and headlights at an elevated position which would be harmful to the amenity of neighbouring occupiers.

- 7.95 Given the distance of the new build element to properties to the south along Hemdean Road and Hemdean Rise, combined with the topography, intervening tree screening and the deeper gardens of these properties, the proposals whilst visible are not considered to result in harmful overbearing effects or loss of privacy.
- 7.96 Given the distance of the new-build to properties to the east along The Cloisters, combined with the intervening tree screening and change in site levels, no overbearing effects of loss of privacy is considered to arise.
- 7.97 With regard to the daylight and sunlights impacts on the neighbouring properties, there are reasonable concerns that the scale and proximity and orientation would affect daylight and sunlight availability to houses to the north. It is noted that no daylight/sunlight report has been submitted to support the proposals. It is considered in the absence of evidence to the contrary that the proposal fails to demonstrate that it would not result in harmful loss of daylight or sunlight to adjacent dwellings to the north in Hemdean Road and Knighton Close.
- 7.98 Notwithstanding harm identified elsewhere, the conversion of the Hemdean School House and Lodge would not likely in themselves result in any harm to neighbouring amenity.
- 7.99 In overall terms, the proposals would be contrary to Policy CC8 and H2 of the Reading Borough Local Plan 2019 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

#### *Standard of Accommodation to be Provided*

##### *New Build*

- 7.100 Policy H5 (Standards for New Housing) requires that all new building housing outside of the Central Area complies with the Nationally Described Space Standards (NDSS) and will be accessible and adaptable in line with M4(2) of the Building Regulations. All developments of 20 or more should provide at least 5% as wheelchair dwellings.
- 7.101 The Planning Statement notes that all proposed units of the new-build element would meet M4(2) standards and Nationally Described Space Standards. Policy H5 requires 5% to be M4(3) standard of accessibility. The application is silent on this point and it is not clear from the drawings whether or not the proposed layout would be capable complying with the M4(3) standard.

- 7.102 Generally, it is considered that the internal layout of the new build flats would be cramped on all floors. They would be largely single aspect with deep living/kitchen areas, and a number of these units would face north. The Design and Access Statement states that the single aspect is *'typically due to the requirement for double loaded corridors necessitated by the need to optimise the development potential of sites'* and that *'the commercial viability and appropriate density of a site depends on a typical design using double loaded corridor'*. As discussed elsewhere in this report, the viability and density is not agreed and this is not considered to be suitable justification for proposals that otherwise provide poor quality accommodation. Furthermore, no daylight/sunlight report has been submitted to support the proposals, and it has not been demonstrated that the single aspect nature of the proposals is an appropriate design solution. A number of the corner bedrooms would be further restricted in terms of light and outlook by the building itself. There would also be harmful overlooking and intervisibility between units, due to the position and siting of windows and balconies.
- 7.103 There would be minimal defensible space at ground floor, with car parking and circulation routes and spaces located close to residential patios and windows and also an unsatisfactory relationship between communal areas and bedrooms. This would result in privacy and disturbance issues harmful to the amenity of future occupiers.
- 7.104 The Designing Out Crime Officer has raised concern regarding the proposed boundary treatment and whether this would be appropriate for creating a safe and secure environment for residents. Specifically, that the low boundary fencing and multiple gates would make it possible to bypass the main entry point, leaving ground floor apartments most vulnerable. This indicates that a better laid out design to the building is needed (not additional fencing).
- 7.105 Given the above, the proposals would be contrary to Policies H2, CC7 and CC8 of the Reading Borough Local Plan 2019 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

#### *School conversion*

- 7.106 The conversion of the school would comprise 10 residential units. These would be small units with the majority only just meeting minimum space standards. Although not unacceptable in purely size terms, units on the west and south side and to a lesser extent the east would feel gloomy and hemmed in due to windows facing onto new retaining walls and overshadowed by existing trees, reducing daylight and sunlight levels as well as outlook. As above, no daylight/sunlight report has been submitted. The combination of the small size, poor outlook and inadequate access to daylight and sunlight would result in harm to the amenity of future occupiers of the affected dwellings.

7.107 The Planning Statement states the School House conversion would be provided with communal garden space to the south of the building. It does not appear that there would be any useable functional and sitting out space or any of the other amenities required by H10 - and the area in question would be heavily overshadowed by trees and would receive very little light. The suggested garden area is currently a wooded slope.

Given the above, the proposals would be contrary to Policies CC8, H8 and H10 of the Reading Borough Local Plan 2019, the Residential Conversions SPD 2023 and the NPPF and this will be discussed in the planning balance at the end of the report.

#### *Lodge conversion*

7.108 The conversion of the lodge would meet internal space standards. However, the kitchen and dining area would be hampered by trees in close proximity to windows. The garden area would be bounded by the car parking and road of the new-build to the south and west, Heamdean Road to the east and trees to the north. This is unlikely to provide suitable functions required under Policy H10 including suitable sitting out space.

7.109 Given the above, the proposals would be contrary to Policies CC8, H8 and H10 of the Reading Borough Local Plan 2019, the Residential Conversions SPD 2023 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

7.110 The Council's Environmental Protection Officer has not raised any concern in respect of noise/disturbance, subject to a noise assessment being submitted for any new mechanical plant to be installed and this approach is considered acceptable. Should the proposals have otherwise been supportable, this would have been secured by way of condition to ensure any such equipment would not generate unacceptable noise impacts upon existing or future surrounding occupiers.

7.111 Similarly, any approval would include conditions to secure submission and approval of a detailed construction method statement prior to commencement of works to ensure suitable mitigation measures are put in place in respect of impacts from construction phase. Further conditions would be recommended to ensure all construction and associated deliveries takes place within normal daytime working hours only and that there should be no burning of waste on site which could adversely impact upon air quality.

7.112 In overall terms, the proposals are considered to be cramped, with insufficient amenity space and insufficient levels of daylight/sunlight resulting in poor quality

of accommodation for future occupiers. The proposal would therefore be contrary to Policies CC8, H5 and H10 of the Reading Borough Local Plan 2019 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

### *Bin Storage*

7.113 Policy CC5 (Waste Minimisation and Storage) requires that new developments incorporate facilities for storage of all types of waste and recycling.

7.114 For the new-build retirement units, the following would be required:

- 6 x 1100L general waste bins
- 10-11 x 1100L recycling bins
- 4 x 240L food waste bins
- 5-6 x 240L glass bins

7.115 A single ground floor bin store with space for 10 bins is proposed. The plan does not specify the size and type of bins proposed but RBC Waste Officers have confirmed that this would not be large enough for the required number of bins.

7.116 For the School House conversion to 10 units, the following would be required:

- 1 x 1100L general waste bin
- 2 x 1100L recycling bins
- 1 x 240L food waste bin
- 1 x 240L glass recycling bin

7.117 Bin store provision is not clear in the submission.

For the Lodge conversion to 1 unit, the following would be required:

- 1 x 140L general waste bin
- 1 x 240L recycling bin
- 1 x 23L food waste caddy
- 1 x 55L glass recycling box

7.118 As above, bin store provision is not clear in the submission and although this is a single dwelling it forms part of a wider residential layout where an overall strategy for waste handling and security against pests and vermin is required.

7.119 Failure to provide suitable bin storage is another shortfall of the proposal, contrary to Policy CC5 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

7.120 Should the application have otherwise been supportable, a condition would have been attached to secure submission and approval of vermin and pest control

measures for all bin stores to ensure the stores are secure and do not generate pollution in terms of odour.

### **Natural Environment - Trees and Landscaping**

- 7.121 Trees are a material planning consideration whether or not they are protected. Section 197 of the Town and Country Planning Act states *'it shall be the duty of the LPA to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees'*.
- 7.122 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 proposals should include appropriate landscaping.
- 7.123 Paragraph 136 of the NPPF 2024 details that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

#### *Existing trees*

- 7.124 The site is open and verdant with a substantial number of trees and other greenery existing. The site is subject to two TPOs. Tree retention and planting is considered important to preserve the existing character. Proposals should demonstrate an appropriate level of greening and/or net gain in the tree number.
- 7.125 An Arboricultural Impact Assessment (AIA) and Method Statement has been submitted and reviewed by the Council's Natural Environment Officer. Along with the Planning Statement, this notes that 2 lots of trees (1 individual mature Lime and 1 small group Cypress) would be lost through the development. However, it is clear that a further young Lime tree on the frontage would also need to be removed to allow for the sub-station on the frontage. This removal is not acknowledged in the AIA and whilst only a small tree, was a replacement for previous felling and it appropriately continues the line of Lime trees which are a feature of the frontage, and which contribute positively to the existing verdant character of the site and this section of Hemdean Road.
- 7.126 The Council's Natural Environment Officer has confirmed that the loss of the mature lime, forming part of the frontage treescape is not acceptable. It is not agreed with the submission that the loss of this tree 'won't really be noticeable' – it is one of the line of mature trees along the frontage and its removal would leave a significant gap.
- 7.127 Importantly, the AIA does not address other elements of the proposals, such as how access would be achieved from Hemdean Road within the root protection area (RPA) without harm to roots of trees, or the how the demolition of the music

building would be dealt with within RPAs (the submission is inconsistent regarding retention/removal of the building). It does not address ground removal works required to the south side of the main school house and which would likely require tree removal and/or damage to their root systems to allow soil removal and provision of retaining structures to expose the lower ground floor window and would be likely to result in pressure to prune. There are a range of other works affecting root systems around the site providing new parking areas, retaining walls etc.

- 7.128 Furthermore, the Natural Environment Officer advises that proposed parking spaces within close proximity to trees (not shown on the Tree Protection Plan - TPP) would be inappropriate due to the propensity of the species to produce extensive basal growth. It is also unclear from the plans how close the parking spaces to the north of the School House would be to the existing mature trees which lie close to the western boundary of the site – It appears car parking does extend into this area and into the bank and into RPAs but this is not dealt with in the AIA.
- 7.129 Given the above, the AIA /AMS is deficient in its detail, misses some proposals affecting trees entirely and lacking clarity on impacts on others. The TPP does not fully reflect the proposals. It is apparent that the proposals will result in harm to trees on site, certainly those being felled, and those where excavation is proposed within RPAs and/or close to trunks. Furthermore, the submission does not include all elements needing to be covered and as such fails to demonstrate no harm to trees purportedly being retained on site, contrary to Policies CC7 and EN12 and the NPPF 2024 and this will be discussed in the planning balance at the end of the report.

### *Landscaping*

- 7.130 Appropriate new planting would be expected to mitigate tree loss, provide a net gain and to soften the development. Whilst the submissions shows the retention of trees and new planting along the southern boundary, no new planting is included on the southern side of the field.
- 7.131 The landscaping shown on the landscape master plan drawing is largely considered to be acceptable – although this is of little usefulness unless and until the impact on existing trees is fully understood; the ultimate landscaping would need to reflect the aims of the Council's tree Strategy in terms of diversity – whilst this is not currently evident, this in itself could have been dealt with by way of conditions, should the application have otherwise been considered supportable.
- 7.132 As noted elsewhere in this report, the submitted SuDs principles for the site do not demonstrate how the drainage system would be linked to soft landscaping features within the development as required by Policy EN18.

- 7.133 In overall terms, the submission fails to demonstrate the full extent of the development's impact on the site's tree population and would remove trees of high amenity value along the frontage which is not acceptable. Other trees will be harmed due to nearby works and may even be required to be removed entirely – it is not clear in the proposal - and there would be an increased pressure to prune or fell in the future – again this is not clear. The proposed development fails to demonstrate lack of harm to trees of high amenity value including protected trees. Furthermore, it fails to demonstrate acceptable provision of tree planting and soft landscaping with consequent harm to visual amenity, the character and appearance of the area, biodiversity and environmental quality of the area.
- 7.134 The proposals would therefore be contrary to Policies CC7, EN12 and EN14 of the Reading Borough Local Plan 2019 and the Tree Strategy 2021 and NPPF 2024. It would also 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'. This will be discussed in the planning balance at the end of the report.

### **Ecology and Biodiversity**

- 7.135 Policy EN12 (Biodiversity and The Green Network) requires that new development should provide a net gain for biodiversity where possible and should incorporate biodiversity features into proposals where practical.
- 7.136 An ecological appraisal, bat report and badger survey report have been submitted with the application. These have been reviewed by the Council's Ecologist. Whilst there are some inconsistencies within the bat survey report, the Ecologist has confirmed these are more to do with clarifications which could easily be addressed through an updated report and do not warrant a refusal on this basis – concluding overall lack of harm to bats.
- 7.136 With regard to badgers, the Council's Ecologist agrees with the submitted report's recommendations for a recommencement survey to be included within a Construction Environmental Management Plan (CEMP). Similarly, with regard to other protected species, no harm is considered to occur subject to recommendations of the report to provide mitigation measures being secured within the CEMP. Should the application have otherwise been supportable, this would have been secured by way of condition.
- 7.137 Whilst the site is within a relatively residential and built up area, there are several bat roosts in the area. Any increase in artificial light at night would have the potential to adversely affect bat activity along with other nocturnal wildlife. Should the application have otherwise been supportable, a condition would have been recommended to secure submission and approval of details of all external lighting to ensure this is designed in a wildlife friendly manner and to limit the impact on light pollution from artificial light.

- 7.138 Subject to securing the above conditions in a planning permission it is considered that the proposals would not adversely impact upon existing habitats and protected species at and near the application site.
- 7.139 The proposed development also includes provision of biodiversity enhancement features across the site including bat and bird boxes, log piles and hibernacula for insects and reptiles as well as hedgehog holes in fencing. These measures would in themselves be welcome and details and specifications and details of monitoring would have been secured by way of condition should the application have otherwise been supportable.
- 7.140 Further to the above, there is a statutory requirement for all proposals to demonstrate that a minimum 10% net gain in biodiversity would be achieved as part of a proposed development. The application is accompanied by a biodiversity net gain (BNG) assessment, report and metric calculation. This demonstrates that the development would result in a 17.29% net gain in area habitat units and a net gain in hedgerows. Whilst there are some discrepancies within the report, the Council's Ecologist has confirmed that the area and linear baseline habitats have been accurately accounted for in the metric. Furthermore, the new trees and other neutral grassland would be 'significant on site enhancements' in accordance with the NPPG.
- 7.141 Should the application have otherwise been supportable, the application would be required to submit a BNG plan prior to commencement of the development (secured by condition) to confirm how this would be achieved as per the metric calculation.
- 7.142 Subject to the recommended conditions above the development is considered to accord with Policy EN12 (Biodiversity and The Green Network) which requires ecology and protected species to be protected and for development to achieve a net gain in biodiversity.

### **Provision of Open Space**

- 7.143 Policy EN9 (Provision of Open Space) requires developments of this scale to make provision for open space to serve the needs of the development. No assessment of need has been submitted and no provision made as part of the proposals. As such the proposal fails to make appropriate provision for open space, harmful to the needs of future occupiers.

### **Transport and Highways**

- 7.144 Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway related matters), TR4 (Cycle Routes and Facilities) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters for new development.

## Vehicle Access

- 7.145 Hemdean Road is classified as C100 and is a Local Transport Corridor with bus services (routes 23 & 24) running along Hemdean Road. The closest bus stops to the site are Hemdean Hill on Hemdean Road, which are located approximately 65m south (northbound services) and approximately 140m south (southbound services) of the site. Hemdean Road is a single carriageway road, subject to a 30mph speed limit. On-street parking is present on both sides of the road, with no restrictions on the eastern side, and restricted parking on the western side. Adjacent to the site, this is limited to 2 hours, Monday-Saturday (08:00-19:00).
- 7.146 The existing vehicular access from Hemdean Road is proposed to serve both converted buildings, including a pedestrian route running for part of the route leading towards (but not extending as far as) the School House. Within the site, the access road is proposed to be widened to 4.5m to allow two-way movement. Whilst there would be a short pinch point retained due to existing trees, Transport Officers confirm this to be acceptable as it benefits from adequate forward visibility. The access would also accommodate fire and refuse vehicles serving the development.
- 7.147 A separate new vehicular is proposed off Hemdean Road to serve the new-build element. Transport Officers have confirmed that the Highway Authority does not support the creation of a new access on to this classified road. It is instead considered that access to all parts of the development, including the new-build, should be taken from the existing access which can be readily upgraded – and is already proposed to be widened – and is capable of safely accommodating the required level of traffic. This would avoid the need for additional point of access and associated loss of on-street parking in existence at the front of the site.
- 7.148 Transport Officer's advice is that as Hemdean Road is designated as a Local Transport Corridor, the Highway Authority's adopted '*Design Guidance for Access onto Classified Road*' must be complied with. This guidance set out criteria for the acceptability and design of new access to ensure that the safety and efficiency of the classified road network is maintained and enhanced. Every new junction onto a classified road introduces:
- Additional turning movements
  - More conflict between vehicles, cyclists and pedestrians
  - Greater risk of accidents
  - Potential disruption to traffic flow
- 7.149 The Highway Authority have confirmed that with regard to this guidance, they would resist the formation of new access onto a classified road where a suitable

alternative access exists onto a non-classified road, or where the development could reasonably share an existing access. The need for a new access is not clearly justified and nor has it been demonstrated that a new access is required to meet the traffic associated with the development. The duplication of accesses creates additional points of conflict on this constrained but busy classified road.

Furthermore, a new access would remove sections of kerbside parking and potentially worsens local parking pressures (with no evidence to the contrary).

- 7.150 As above, the availability and suitability of the existing access negates the need for and weighs against the need for, or acceptability of, a new additional access point onto Hemdean Road. The new access would create an unnecessary and harmful arrangement which would worsen highway safety.

#### *Pedestrian Access*

- 7.151 With regard to the pedestrian access, a dedicated footway is currently provided along the existing access. However, this would not extend to serve the 10 residential units at the rear of the site and stops adjacent to the front of the new build housing. As such, the proposed arrangement fails to provide a continuous, safe and convenient pedestrian route for all users.

#### *Car Parking Provision*

- 7.152 In accordance with the Council's current Parking Standards and Design SPD 2011 the residential car parking standards of 1 space per 1- or 2-bedroom flats is required, plus 1 space per 10 dwellings for visitors to flats.
- 7.153 The proposed site layout shows 10 car parking spaces and 1 visitor car parking space adjacent to the School House building. at the, along with 16 car parking spaces at the front of the site and 3 visitor parking spaces.
- 7.154 In terms of the new-build retirement living accommodation, the adopted Parking Standards require a parking provision of 1 space per unit plus 1 space for staff. The SPD allows for reduced provision where robust evidence demonstrates that lower levels would not give rise to highway safety concerns. Retirement living development typically cater for older residents who demonstrate reduced levels of car ownership and higher reliance on sustainable transport modes, lifts from family and on-site facilities. According to the submission, the scheme would be minimally staffed, with only a house manager on duty during office hours.
- 7.155 The proposed site layout shows 16 car parking spaces at the front of the site and 3 visitor parking spaces.

- 7.156 The proposed provision of 16 car parking spaces (0.31 per unit), even with 3 additional visitor spaces, represents a substantial shortfall against the adopted Parking Standards SPD requirement of 1 space per unit plus staff accommodation. To support this lower provision, the application has provided evidence drawn from comparable Churchill Living developments which show significantly lower car ownership and usage among residents of retirement accommodation.
- 7.157 Transport Officers advise that notwithstanding the above, it is also important to recognise that car ownership patterns can vary, and reliance on averaged data risks underestimating peak demand or future changes in resident behaviour. Whilst typical demand at similar development might be lower, the development must ensure that appropriate resilience is built into parking provision to avoid future overspill parking on the surrounding highway network.
- 7.158 Transport Officers advise that any increase in on-street parking demand, particularly in areas where parking bays are already under pressure or proposed to be removed, would be detrimental to both safety and network efficiency. Transport Officer's further advise that the proposed parking provision should be robustly assessed against a worse-case scenario derived from the comparable Churchill Living developments rather than relying on average demand figures. This would ensure that sufficient capacity is provided to accommodate potential variations in car ownership and avoid any risk of overspill parking onto the surrounding highway network.
- 7.159 In addition, further details would be required in respect of car park management arrangement would be allocated and controlled to demonstrate how an appropriate balance between resident and visitor parking would be maintained, ensuring that adequate provision would remain available for visitors at all times and that displacement on the public highway would be avoided. Should the proposals have otherwise been supportable, this could have been dealt with by way of condition. Similarly, the proposals would be required to provide electric vehicle charging points (1 space for every 10 spaces). This could also have been dealt with by way of condition.

#### *Trip Generation*

- 7.160 The TRICS analysis indicates that the proposed residential development would generate fewer vehicular trips than the former school use. In addition, the nature, timing, and distribution of trips associated with residential development differ from those of a school, which are typically concentrated at peak drop-off and pick-up periods. Residential traffic is more dispersed throughout the day and evening. The TRICS analysis suggests that a proposed 51 retirement living units would generate 6 two-way vehicular trips in each peak, and a total of 99 two-way vehicular trips across a 12-hour daily. Given this, Transport Officers advise that

the reduced trip generation does not support the introduction of a new access onto Hemdean Road as the existing access would be capable of safely accommodating the development traffic.

#### *Mobility Scooter and Cycle Parking*

- 7.161 With regard to the retirement accommodation, the proposed site plan includes a dedicated buggy/cycle store, with space for up to 8 buggies, which is located to the north of the new-build element. Transport Officers advise that there would likely be a demand for 2-3 buggies on average per development and therefore this could be used as flexible storage.
- 7.162 The Parking SPD also sets out a requirement for 0.5 cycle parking spaces per 1 or 2 bed unit, equating to 5 spaces for the School House conversion. Sheffield stands are shown on the site plan, providing 6 spaces. However, cycle storage provision must be within a lockable covered store to meet standards.
- 7.163 The Lodge conversion could include cycle storage within the garden by way of store/shed which would be acceptable and could be secured by condition.

#### *Bin Collection*

- 7.164 Refuse collection is proposed to be undertaken on-site via the existing access road for both proposed uses to get within 10m of the refuse stores. Notwithstanding concerns raised in respect of bin provision, Transport Officers have not raised any concern in respect of refuse collection arrangements. However, any increase in provision as required may result in an uncontained situation that results in clutter and spillage onto the highway that would not be acceptable.

#### *Construction Matters*

- 7.165 The construction phase of the proposed development would be likely to impact the surrounding highway network given the prominent location. Should the application be considered supportable, a condition would be attached to secure submission, approval and implementation of a detailed Demolition and Construction Method Statement.
- 7.166 In overall terms, there are a number of highway related concerns with the proposed development, particularly in relation to access, parking provision and pedestrian connectivity and the proposals would be contrary to Policies TR1, TR3 and TR5 and the NPPF 2024. This will be discussed in the planning balance at the end of the report.

## **Sustainability and Energy**

- 7.167 Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change.
- 7.168 With regard to the new-build element, Policy H5 (Standards for New Housing) and the Council's Sustainable Design and Construction SPD (2019) requires all major category new build housing to achieve the 'zero carbon homes' standard. The policy goes on to set out that as a minimum development should achieve a 35% improvement over the carbon emission rate set out in Building Regulations with a financial contribution to offset any remaining carbon emissions to zero.
- 7.169 Policy CC4 (Decentralised Energy) states that new development of the scale proposed should include provision of on-site decentralised energy provision where feasible/viable or where existing decentralised energy provision is present within the vicinity of the site connect to this network where feasible.
- 7.170 The conversion elements would be required to meet the most up-to-date BREEAM 'Excellent' standards.

### *New-Build*

- 7.171 The applicant has submitted an Energy Statement with the application which details measures such as efficient building fabric (e.g insulated floors, efficient glazing), air source heat pumps and PV roof panels. These would be acceptable.
- 7.172 The submitted report projects that the new-build element would achieve a 45.44% improvement of carbon emission rate set out in the building regulations that would comply with Policy H5 in this respect.
- 7.173 With regard to decentralised energy, the report notes that the closest heat network is at the University of Reading, approximately 4.2km from the application site. The applicant considers that due to this distance, it would not be feasible. This is accepted.
- 7.174 In terms of on-site decentralised energy provision, the report explores a range of options and proposes a solar photovoltaic system for on-site provision of electrical energy and air source heat pumps for provision of hot water (with electrical panel heaters proposed for heating) as a viable option to generate energy. Combined heat and power units and ground source heat pumps (which are sequentially favoured within the Council's Sustainable Design and Construction SPD) have been discounted due to inefficiencies and the constraints of the site. Air Source Heat pumps are also supported by the SPD.

7.175 If planning permission were to be granted a series of planning conditions would be required to secure design stage and as built stage final SAP assessment for all dwellings to confirm the actual performance of the development and amount of carbon off-setting contribution required. Furthermore, should the application have otherwise been supportable, then a s106 obligation would have been required to secure a financial contribution to off-set carbon emissions to zero. However, given the recommendation is to refuse planning permission for other reasons, completion of a s106 legal agreement is not being pursued and lack of such an agreement to off-set carbon emissions to zero would represent a further reason for refusal of the application.

### *Conversion*

7.176 The application is supported by a BREEAM Pre-Assessment which indicates that this element of the proposals would achieve an 'Excellent' rating. Should the application have otherwise been supportable, various conditions would have been attached to require submission and approval of related BREEAM certificates prior to first occupation and upon completion to demonstrate compliance.

7.177 The submitted energy statement includes measures to be incorporated within the development that would satisfy the above requirements. In demonstrating compliance with the above standards, the proposals have been designed to incorporate a range of sustainable construction techniques and measures to adapt to climate change including use of sustainable and thermally efficient materials, high efficiency water fittings, low energy usage light fittings and on-site ecological enhancements discussed earlier in this report. Overall, with the proposed level of CO2 emission reduction, thermal efficiency measures and provision of on-site decentralised energy sources are considered to comply with policies CC2, CC3, CC4, CC5 and H5 and achieving these standards is considered to be a benefit of the proposals.

### Flooding

7.178 Policy EN18 (Flooding and Sustainable Drainage Systems) states that development will be directed to areas at lowest risk of flooding and that where development in areas at risk of flooding is necessary it will not reduce the capacity of the flood plain, impede flow of flood water or in any way increase risks to life and property arising from flooding and that wherever possible should be designed to reduce flood risk both on and off-site. All major developments are also required to incorporate SuDS to ensure that, as a minimum, run-off rates are no greater than existing conditions of the site.

7.179 The site is within Flood Zone 1 as designated by the Environment Agency and the application is accompanied by a Flood Risk Assessment (FRA). In accordance with the NPPF annex 3, the flood risk vulnerability classification of residential development is 'more vulnerable' and should be directed to areas at the lowest

risk of flooding – within Flood Zone 1. However, the site is within an area at risk of surface water flooding.

7.180 The supporting text to Policy EN18 confirms that the sequential test has already been carried out as part of the Local Plan preparation process for sites that are allocated for development within the Local Plan and that on such sites a sequential test is not required as part of a planning application. Given the emerging site allocation, a sequential test is not required in this instance, but the development must still demonstrate that it would be safe in terms of flood risks.

7.181 The Environment Agency have not commented on the application. However, the FRA includes a variety of site-specific flood mitigation measures including provision of an elevated ground floor level to all parts of the building set above the modelled flood level for the site as well as details of the flood warning and evacuation plan for the development in the event of an extreme flooding event. Should the application have otherwise been supportable, a condition would have been attached to ensure that the development is carried out and maintained in full accordance with all the mitigation measures set out within the submitted FRA in order to satisfactorily protect future occupiers from flooding and to ensure compliance with Policy EN18.

#### Drainage

7.182 Notwithstanding the above, a sustainable drainage strategy (SuDS) for the development has been provided, which has been reviewed by the Lead Local Flood Authority (LLFA). The scheme includes the provision of attenuation tanks connecting to the Thames Water Sewer in Hemdean Road. However, the National standards for SuDs (updated 30<sup>th</sup> July 2025) states the following at Paragraph 1.2:

*Runoff from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy:*

- *priority 1: collected for non-potable use*
- *priority 2: infiltrated to ground*
- *priority 3: discharged to an above ground surface water body*
- *priority 4: discharged to a surface water sewer, or another piped surface water drainage system*
- *priority 5: discharged to a combined sewer*

7.183 The submitted strategy has not referenced this hierarchy and, furthermore, the LLFA advises that in any event the applicant has not applied the National standards correctly. As such, the strategy not in accordance with the latest SuDs guidance and is not acceptable.

7.184 Policy EN18 requires that sustainable drainage should be landscaped led. As Discussed elsewhere in this report, the proposal includes no landscaping within the drainage design and as such it is contrary to Policy EN18 as well as National

standards. This will be discussed in the planning balance at the end of the report.

## **Other Matters**

### Employment Skills and Training

7.185 As a major category residential development and in line with the adopted Employment Skills and Training SPD (2011), the development is required to provide or contribute towards a construction phase employment and skills plan to benefit the local employment market. This would be secured as part of any 106 legal agreement with the applicant having the option of whether to provide a plan or an equivalent financial contribution as per the formula set out in the SPD. Securing this as an obligation as part of a s106 agreement would comply with Policy CC9 (Securing Infrastructure) which requires development that would provide employment to provide mitigation in line with its impacts on labour and skills.

### Archaeology

7.186 Policy EN2 (Areas of Archaeological Significance) requires developments to ensure that they do not have an unacceptable impact on archaeological remains, and for proposals to undertake appropriate safeguarding.

7.187 The site falls within an area of archaeological significance and archaeological remains that may be damaged by ground disturbance for the proposed development. Berkshire Archaeology have confirmed that they have no objection subject to submission, approval and implementation of a Written Scheme of Investigation being submitted to and approved by the LPA to ensure the identification and recording of any buried archaeological remains. Should planning permission have been forthcoming, this would have been secured by way of condition and does not form a reason for refusal.

### Matters Raised in Representation

7.188 All material planning considerations have been addressed in the above assessment.

7.189 While the concerns of the local residents in terms of the disruption including noise and traffic implications that may be caused by 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 construction. Ordinarily, the requirements of Environmental Health legislation would seek to limit any harm so far as reasonably practicable. Should the application have been supported, a condition requiring submission and approval of construction and demolition statement to be approved prior to commencement of works would have been attached to minimise any such disruption.

7.190 The proposed development would be subject to a contribution towards CIL. Money collected in this way would be used to improve the infrastructure in the Borough.

7.191 Whilst consideration is given to the impact upon amenity in terms of loss of light or overbearing impact the loss of a view/outlook is not a material planning consideration.

### **Equality implications**

7.192. 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.

b. 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.

7.193 With regard to the above, whilst the Equality Act protects against age discrimination, housing restricted to older people (e.g over 60s) is not illegal discrimination. The Equality Act 2010 allows discrimination on protected classes if it is a “proportionate means to achieve a legitimate goal” which in this case is building a retirement community.

## **8. CONCLUSION**

8.1 As with all planning 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 set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004.

8.2 The Council cannot demonstrate a 5-year housing supply and therefore the development must be assessed in line with Paragraph 11d(ii) of the NPPF 2024 and against the policies in the NPPF taken as a whole.

8.3 The three overarching objectives contained within paragraph 8 of the NPPF 2024 seek to balance growth and local community needs against protection of the

natural, built and historic environment. As such, any harmful impacts of the proposed development are required to be weighed against the economic, social, environment and any other public benefits in the context of national and local planning policies, as detailed in the appraisal above.

- 8.4 It is acknowledged that there would be planning benefits associated with the proposed development. A range of social, economic and environmental benefits consistent with the NPPF's definition of sustainable development would be provided. Officers' summary of these is set out below:

#### *Social benefits*

- 8.5 The provision of 62 dwellings would make a contribution towards meeting the Council's housing needs (Policy H1). Provision of older persons housing could also lead to positive impacts on the wider housing market from the 'freeing' up of a similar number of units from the stock of large dwellings. Furthermore, it is likely that occupants of the development could experience improvements to their health and wellbeing through companionship and shared lives (Policy H6).
- 8.6 Together, these benefits are consistent with the NPPF 2024 housing policies and are considered to have significant weight.

#### *Economic benefit*

- 8.7 The scheme would result in a range of economic benefits particularly during the construction phase, including the creation of jobs, contribution to the local economy, apprentice schemes and utilising local labour (Policy CC9). It is noted that none of the economic benefits would be unique to this scheme.
- 8.8 The importance of the scheme's economic benefits would be consistent with Paragraph 85 of the NPPF 2024. However, this would mostly be a short-term benefit, considered to be of limited weight. Whilst their importance to the construction industry and the economy are acknowledged, these benefits are temporary and generic respectively and would be realised on most, if not every, residential development.

#### *Environmental Benefits*

- 8.9 The scheme includes a minimum 10% Biodiversity Net Gain and other ecological enhancements (Policy EN12). This is consistent with Paragraph 187d) of the NPPF 2024. This could be achieved through a range of different designs and methods and as such is not something which points strongly in favour of this particular scheme. There is some limited weight to be given to this benefit..
- 8.10 The scheme also indicates good performance of the development in respect of energy efficiency, carbon off-setting (Policies CC2, CC3 and H5). Again, this is

largely dependent on the specification of the buildings and could be achieved across a wide range of different design approaches.

8.11 Whilst acknowledging the above benefits, there are considered to be a significant amount of harm resulting from the proposals in conflict with policies. The harms identified in the report are summarised as being:

- The absence of acceptable affordable housing provision, causing the proposal to fail to contribute adequately to housing needs of Reading Borough and the need to provide sustainable mixed and balanced communities. Objective evidence confirms a critical need for Affordable Housing in Reading Borough. The failure to meet this critical need would result in a substantial degree of harm. (Policies H3, CC9, Affordable Housing SPD and paragraph 64 of the NPPF 2024)
- The submission fails to demonstrate that there is no need to retain the existing education/community use. The existing nursery in particular remains in active use and the proposal would result in the loss of a valued community facility (Policy OU1)
- The proposal would result in harm to the non-designated heritage assets – the Lodge and the Hemdean House School. This harm would be less than substantial but not outweighed by the public benefits, (Policies EN1, EN4, EN6, NPPF para 216)
- The proposal would result in harm to the character and appearance of the area and street scene (Policy CC7 and paragraphs 96, 129, 131, 135 and 136 of the NPPF 2024)
- The proposal fails to demonstrate that it would not harm trees of high amenity and result in unacceptable tree loss (Policies CC7, EN12, EN14 the Tree Strategy 2021 and paragraphs 135, 136 and 187 of the NPPF)
- The proposals would result in harm to neighbouring amenity through overbearing effects, loss of privacy and vehicle disturbance (Policy CC8)
- The proposals would result in poor quality of accommodation for future occupiers due to cramped units, insufficient daylight/sunlight and insufficient amenity space (Policies CC8, H5, H10 and paragraphs 96, 135 and 198 of the NPPF 2024)
- The proposals which include general housing as well as specialist housing would fail to provide larger dwellings of 3 bedrooms or more failing to adequately contribute towards meeting identified housing need (Policy H2 and paragraphs 61 and 129 of the NPPF 2024).
- The proposals would fail to make appropriate provision for open space to serve the needs of the development. (Policy EN9 of the Reading Borough Local Plan 2019 and paragraphs 98 and 103 of the NPPF 2024.)
- The proposals would fail to provide sufficient bin storage for all aspects of the development (Policy CC5).
- The proposal would provide insufficient car parking, insufficient pedestrian footway, unsuitable new access and would fail to demonstrate that harmful overspill parking would not occur (Policies TR1, TR3, TR5, Parking Standards and Design SPD and paragraphs 109, 115 and 117 of the NPPF 2024)

- The absence of an acceptable Sustainable Drainage Strategy to demonstrate acceptability in terms of sustainable drainage and attenuating localised flooding, fails to secure links to existing green network and integration with tree planting and landscaping (Policy EN18, Sustainable Design and Construction SPD and paragraph 182 of the NPFP 2024).
- 8.12 With regard to paragraph 11)d)ii, Footnote 9 confirms that the relevant key policies are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.
- 8.13 Relevant to this development are the following:
- 8.14 **Paragraph 66 – Affordable Housing** - this major development conflicts with paragraph 66 in that whilst a financial contribution is proposed, at 2.8% and off site rather than on site this is significantly below the 30% required and without acceptable justification. As such the affordable housing does not meet critical local need for that housing, in fact there is very little scope for it to do so given the minimal amount of affordable housing offered by the applicant, and the absence of a S106 legal agreement to secure any affordable housing. Failure to provide adequate affordable housing would fail to make the most appropriate use of the land resource. This is a significant shortcoming of the proposed development.
- 8.15 **Paragraph 88 - Paragraph 110 and 115 – Sustainable transport** – the proposal is within a sustainable location near to services and facilities. However, this would be true of any housing in this location and does not in itself justify the particular form of development proposed and is largely neutral in terms of weight. The development fails to prioritise sustainable transport modes through failure to provide pedestrian routes of acceptable standard.
- 8.16 **Paragraph 129 – Density** - In terms of whether the development would make efficient use of land, it is noted that the density is high but that this is achieved through poor design and without proper consideration of the social needs of the area. It is apparent that the proposal would not provide for the identified need for different types of housing due to the significant shortfall in affordable housing proposed. It has also been identified elsewhere in this report that the proposed buildings and development as a whole would be harmful to the area’s prevailing character which includes the setting of heritage assets, which also militates against the importance of securing well-designed and attractive places.
- 8.17 **Paragraphs 135 and 139 – Achieving well-designed places –**  
These paragraphs require that “Planning policies and decisions should ensure that developments:  
*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>51</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

8.18 For the reasons set out in this report, it is considered that the proposal would not add to the overall quality of the area. Conversely, it would detract from it. Due to the excessive scale, bulky form and site coverage of the new-build element, this would result in an overly dominant, unattractive development that fails to accommodate buildings, parking areas, tree planting and other soft landscaping in a manner that enhances the character and appearance of the area. The increased prominence of an inappropriately designed building would not be sympathetic to local character and history. It would represent inappropriate change rather than a high quality redevelopment. It is considered that high quality, attractive, design could successfully increase density and provide significant housing on the site. The current scheme does not achieve this.

8.19 Paragraph 139 states that “*Development that is not well-designed should be refused, especially where it fails to reflect local design policies and government guidance on design...*”

8.20 With regard to paragraph 11)d)ii, and for the reasons given, the proposals are not considered to comply with Making Effective Use of the Land, Securing Well-Designed Places or Providing Affordable Homes.

8.22 Taking account of the Framework as a whole, it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the identified harm as described above, all matters specifically referenced under Footnote 9 and as such it is considered that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

8.23 At this point, it is also pertinent to outline the position in respect of the status of the Local Plan, the current version of the Local Plan (adopted in November 2019) which turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest needed to be considered for updating to reflect changing circumstances and national policy. The submission draft of the Local Plan Partial Update was submitted in May 2025, and the Local Plan hearings took place in February 2026. Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is considered in respect of the Local Plan policies pertinent to this application that they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan, aside from Policy H1 (Provision of Housing) which is accepted to be out of date. Therefore, they can continue to be afforded weight in the determination of this planning application and, aside from Policy H1, are not considered to be ‘out of date’. Policy H1 is out of date because the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in National Planning Practice Guidance (NPPG) (as required now policy H1 is out of date) or for the provision of Affordable Housing.

8.24 The LPA’s view, as described above, is that the main policies, with the exception of Policy H1, are not out of date, despite only one policy being relevant it is accepted that the ‘tilted balance’ by paragraph 11 of the NPPF is engaged and is also addressed above. Even if relevant policies were considered out of date (which, for completeness, in the case of all but one they are not) it is considered that the provisions of NPPF paragraph 11 still do not support the granting of planning permission in this specific instance and taking account of the Framework as a whole (Reading Borough Local Plan 2019 and the NPPF December 2024), it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the identified harms.

8.25 The proposals are therefore recommended for refusal for the reasons listed in the recommendation box at the top of this report.

### **Plans and documents considered:**

Proposed Floor Plans – School House Drawing No.10137CS PA16 Rev A

Proposed Floor Plans – Lodge Drawing No.10137CS PA12 Rev A

Proposed Ground Floor Plan – Retirement Block Drawing No.10137CS PA02 Rev A

Proposed First floor Plan – Retirement Block Drawing No.10137CS PA03 Rev A

Proposed Second Floor Plan – Retirement Block Drawing No.10137CS PA04 Rev A

Proposed Roof Plan – Retirement Block Drawing No.10147CS PA05 Rev A

Planning Statement

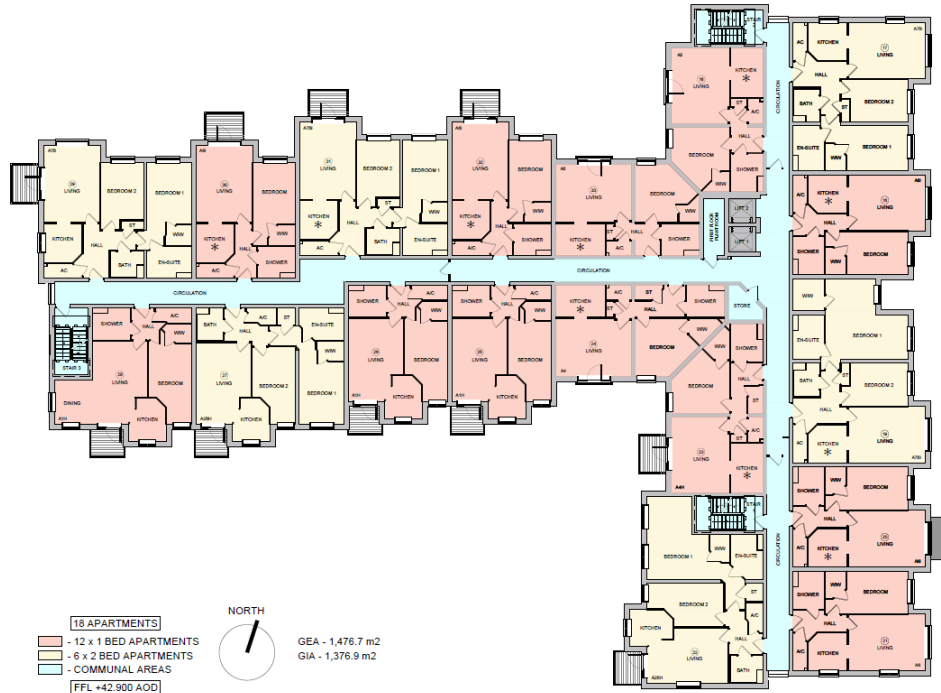
Received 24<sup>th</sup> February 2026

Location Plan Drawing No.10137CS PALOC  
Proposed Site Plan Drawing No.10137CS PA00  
Proposed Site Plan and Roof Plan Drawing No.10137CS PA01  
General Arrangement Plan Landscaping Drawing No.PLAN24902 09  
Landscape Masterplan Drawing No.PLAN24902 10  
Proposed East Elevation – Retirement Block Drawing No.10137CS PA06  
Proposed North Elevation – Retirement Block Drawing No.10137CS PA07  
Proposed South Elevation – Retirement Block Drawing No.10137CS PA 08  
Proposed West Elevation – Retirement Block Drawing No.10137CS PA09  
Proposed Elevations – Lodge Drawing No.10137CS PA13  
Proposed Elevations – Hemdean School House Drawing No.10137CS PA17  
Archaeological Assessment 1.1  
Affordable Housing and Viability Statement  
Arboricultural Impact Assessment and Method Statement 25058-AIA-JB  
Manual for managing trees on development sites  
Badger Survey Report 784-B073665  
Biodiversity Statutory Metric  
Bat Roost and Activity Report 784-B073665  
Preliminary Ecological Appraisal 784-B03775  
Design and Access Statement Part 1  
Design and Access Statement Part 2  
Great Crested Newts Report 3493-2025  
Flood Risk Assessment 1953  
Heritage Statement 1.1  
Statement of Community Involvement  
Energy Statemetn  
Transport Statement 536.0100/TS/1  
Tree Protection Plan T5058-TPP-01  
Received 2<sup>nd</sup> February 2026









- 18 APARTMENTS**
- 12 x 1 BED APARTMENTS
  - 6 x 2 BED APARTMENTS
  - COMMUNAL AREAS
- FFL +42.900 AOD



GEA - 1,476.7 m<sup>2</sup>  
GIA - 1,376.9 m<sup>2</sup>

Scale 1:100

CORCHILL LIVING			
REVISED	DATE	BY	APP
1	10/11/2024	CH	10137CS

Client  
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PROPOSED RETIREMENT APARTMENTS  
FORMER HEMDEAN HOUSE SCHOOL,  
HEMDEAN ROAD, CAVERHAM  
RGA 1SD

PROPOSED FIRST FLOOR PLAN

PLANNING APPLICATION

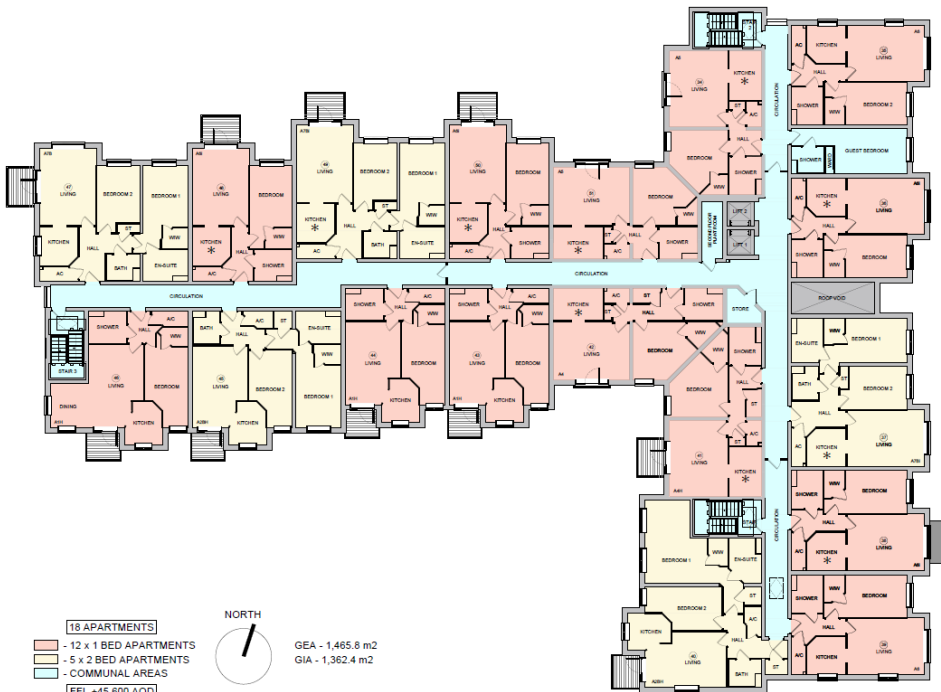
DATE: 10/11/2024  
SCALE: 1:100  
DRAWN: CH

10137CS PAD3 A

planningissues  
Professional Services Limited  
10137CS PAD3 A

Former Hemdean House School, Hemdean Road - Proposed Retirement Housing - First Floor Plan

### Proposed First Floor Plan (new-build) – not to scale



- 18 APARTMENTS**
- 12 x 1 BED APARTMENTS
  - 5 x 2 BED APARTMENTS
  - COMMUNAL AREAS
- FFL +45.600 AOD



GEA - 1,485.8 m<sup>2</sup>  
GIA - 1,362.4 m<sup>2</sup>

Scale 1:100

CORCHILL LIVING			
REVISED	DATE	BY	APP
1	10/11/2024	CH	10137CS

Client  
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PROPOSED RETIREMENT APARTMENTS  
FORMER HEMDEAN HOUSE SCHOOL,  
HEMDEAN ROAD, CAVERHAM  
RGA 1SD

PROPOSED SECOND FLOOR PLAN

PLANNING APPLICATION

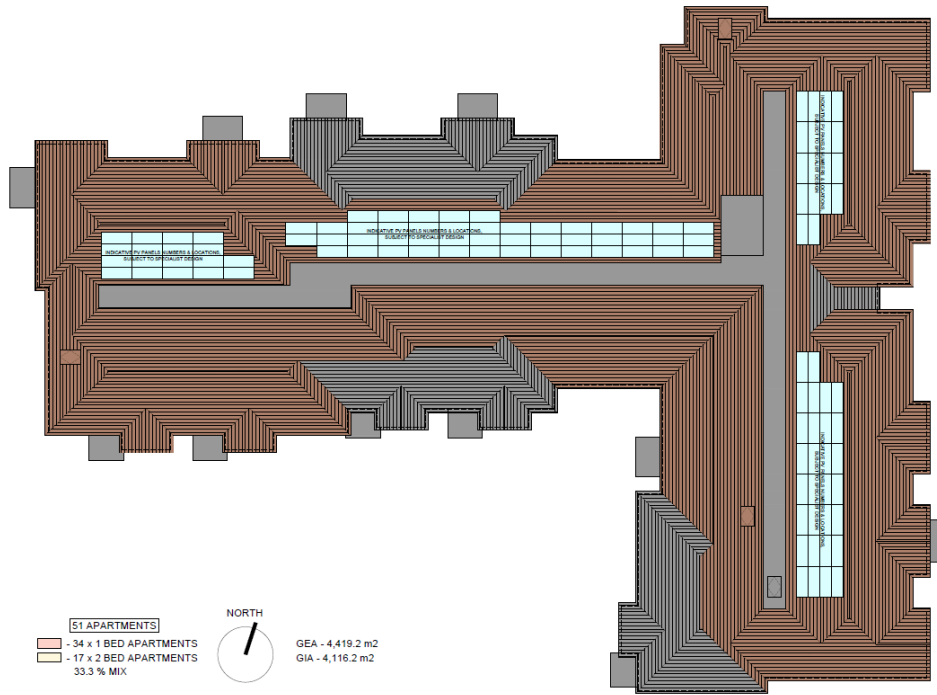
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10137CS PAD4 A

planningissues  
Professional Services Limited  
10137CS PAD4 A

Former Hemdean House School, Hemdean Road - Proposed Retirement Housing - Second Floor Plan

### Proposed Second Floor Plan (new-build) – not to scale

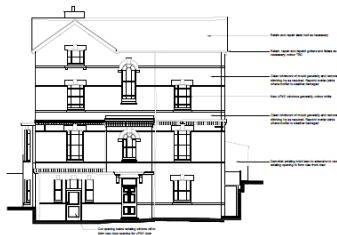


Former Hemdean House School, Hemdean Road - Proposed Retirement Housing - Roof Plan

### Proposed Roof Plan (new-build) - not to scale

REVISIONS	
NO.	DESCRIPTION
1	ISSUED FOR PERMITTING

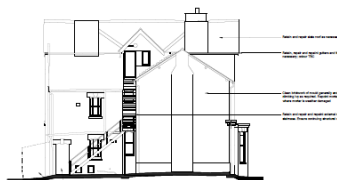
PROPOSED RETIREMENT APARTMENTS
   
 FORMER HEMDEAN HOUSE SCHOOL
   
 HEMDEAN ROAD, CAVERSHAW
   
 RICE 1502
   
 PROPOSED ROOF PLAN
   
 PLANNING APPLICATION
   
 Date: 11/08/2024
   
 Scale: 1:100
   
 10137CS PA05 A



East Elevation (1:100)



South Elevation (1:100)



West Elevation (1:100)



North Elevation (1:100)

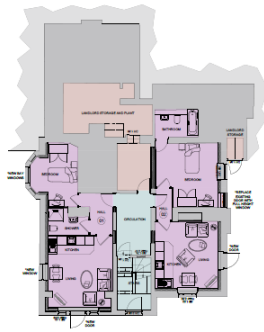
REVISIONS	
NO.	DESCRIPTION
1	ISSUED FOR PERMITTING



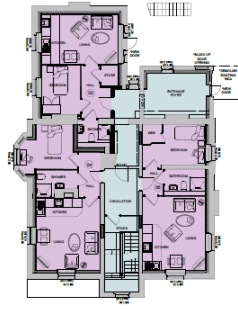
PROPOSED RETIREMENT APARTMENTS
   
 FORMER HEMDEAN HOUSE SCHOOL
   
 HEMDEAN ROAD, CAVERSHAW
   
 RICE 1502
   
 PROPOSED ELEVATIONS - SCHOOL HOUSE
   
 PLANNING APPLICATION
   
 Date: 11/08/2024
   
 Scale: 1:100
   
 10137CS PA17

Former Hemdean House School, Hemdean Road - School House - Proposed Elevations

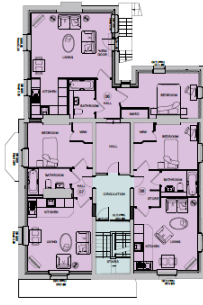
### Proposed Elevations (Hemdean School House) – not to scale



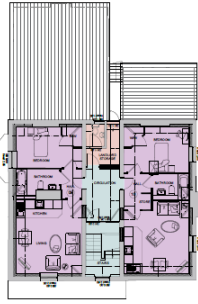
Lower Ground Floor Plan (1:100)



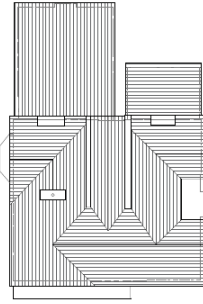
Ground Floor Plan (1:100)



First Floor Plan (1:100)



Second Floor Plan (1:100)

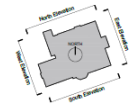


Roof Plan (1:100)

CHURCHILL LIVING	
REVISIONS	
No.	Date
1	20/05/2016

School House  
Schedule of Areas

Flat 1	- 38.2 m <sup>2</sup>
Flat 2	- 41.6 m <sup>2</sup>
Flat 3	- 37.0 m <sup>2</sup>
Flat 4	- 38.1 m <sup>2</sup>
Flat 5	- 38.3 m <sup>2</sup>
Flat 6	- 58.0 m <sup>2</sup>
Flat 7	- 38.0 m <sup>2</sup>
Flat 8	- 36.7 m <sup>2</sup>
Flat 9	- 36.6 m <sup>2</sup>
Flat 10	- 40.5 m <sup>2</sup>
GIA	- 617 m <sup>2</sup>
Net Saleable	- 410 m <sup>2</sup>



Client  
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PROPOSED RETIREMENT APARTMENTS  
FORMER HEMDEAN HOUSE SCHOOL  
HEMDEAN ROAD, CAVERSHAM  
PLA 150

PROPOSED PLANS - SCHOOL HOUSE

PLANNING APPLICATION

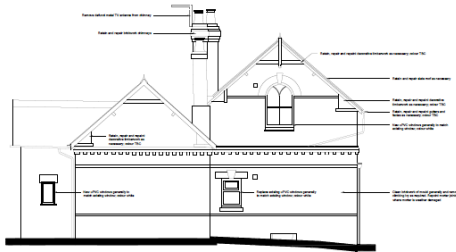
Case No.	10137CS PA16
Date	16/05/2016
Applicant	Churchill Living
Site No.	10137CS PA16
Site Name	A

planning issues  
Town and Country Planning Consultants

Former Hemdean House School, Hemdean Road - School House - Proposed Floor Plans



## Proposed Floor Plans (Hemdean School House) – not to scale

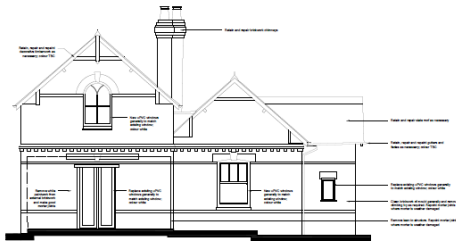
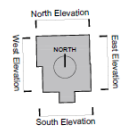


North Elevation (1:50)

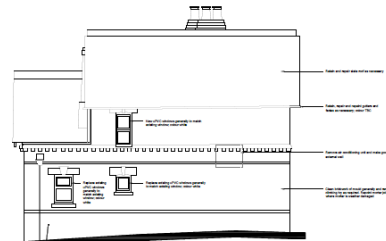


South Elevation (1:50)

CHURCHILL LIVING	
REVISIONS	
No.	Date
1	20/05/2016



West Elevation (1:50)



East Elevation (1:50)

Client  
**Churchill Living**  
Your Reality • Your Choice

PROPOSED RETIREMENT APARTMENTS  
FORMER HEMDEAN HOUSE SCHOOL  
HEMDEAN ROAD, CAVERSHAM  
PLA 150

PROPOSED ELEVATIONS - LODGE

PLANNING APPLICATION

Case No.	10137CS PA13
Date	16/05/2016
Applicant	Churchill Living
Site No.	10137CS PA13
Site Name	A

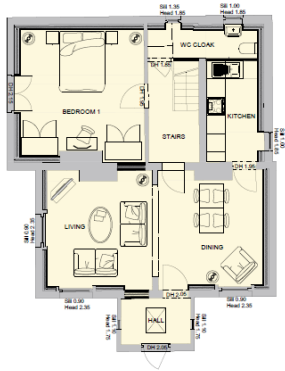
planning issues  
Town and Country Planning Consultants

Former Hemdean House School, Hemdean Road - Lodge - Proposed Elevations

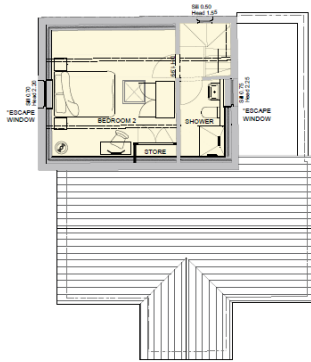


## Proposed Elevations (School Lodge) – not to scale

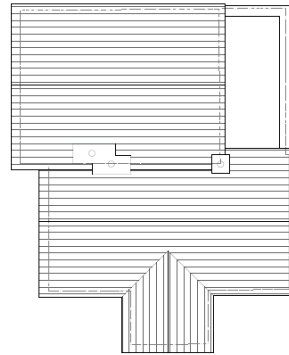
BOARD LIVING			
REV	DESCRIPTION	DATE	BY
1	ISSUED FOR PERMIT	10/10/18	AS



Ground Floor Plan (1:50)

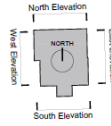


First Floor Plan (1:50)



Roof Plan (1:50)

Nursery  
Schedule of Areas  
GIA - 92.0 m<sup>2</sup>  
Net Saleable - 88.6 m<sup>2</sup>



Churchill Living  
Your Retirement Home

PROPOSED RETIREMENT APARTMENTS  
FORMER HEMDEAN HOUSE SCHOOL  
HEMDEAN ROAD, COVERSBURGH  
RG4 7ED

PROPOSED FLOOR PLANS - LODGE

PLANNING APPLICATION

10137CS PA12 A

planningISSUES

Former Hemdean House School, Hemdean Road - Lodge - Proposed Floor Plans

Scale 1:50

## Proposed Floor Plans (School Lodge) - not to scale