

DELEGATED APPLICATION REPORTS

Application No's: 221806/FUL and 221807/LBC

Address: 27-33 Christchurch Road, Reading

Proposal: Part converting an existing house and 9 flats to 12 flats including extensions to lower ground and ground floors.

Case officer: Ethne Humphreys

Target Dates: Originally 6/10/2023; Extension of time agreed until 5/01/2024

Site Description and Surrounding Area:

The application site relates to No's 27-33 Christchurch Road, 4 properties that form part of a Grade II Listed terrace located on the north side of Christchurch Road and on the corner with Kendrick Road to the east.

The listing description is as follows:

'CHRISTCHURCH ROAD 1. 5128 (North Side) Nos 27 to 33 (odd) SU 7272 9/84 II GV 2. Circa 1840. Built as part of Whitley Crescent. A good stucco terrace of 2 bay 3 storeys and basement houses. String at 1st floor level, eaves, hipped slate roof. Glazing bar sashes except on 2nd floors and upper sashes of No 27. Ground floor windows in segmental-headed recesses. Doors in deep recesses with fluted quadrant jambs, key-pattern frieze and radiating fanlights. Excellent panelled doors with large central rosette all similar (except for No 27 now replaced by poor modern door). Nos 27-31 (odd) retain fleur-de-lys rails.'

The site is within the Christchurch Conservation Area and an Air Quality Management Area. It is also within an Article 4 Direction Area that restricts change of use from C3 dwellings to C4 houses in multiple occupation without planning permission.

Proposal:

This is an application for planning permission and associated listed building consent to convert part of the existing house and 9 flats to 12 flats. Two storey extensions at the rear of No's 27-33 are proposed to facilitate, following demolition of existing rear extensions.

The proposals comprise 8 x 1 bed units and 4 x 2 bed units.

Proposed materials include timber windows and doors, brick and render and slate roof.

Plans Submitted:

Site Location Plan A-1000 Rev C

Received 30th August 2023

Existing Landscape Plan A-1200 Rev B

Existing Window Schedule 27 A-1500 Rev B

Existing Window Schedule 29 A-1510 Rev B

Existing Window Schedule 31 A-1520 Rev B

Existing Window Schedule 33 A-1530 Rev B

Existing Window Schedule Lower Ground Floor A-1600

Existing Wall Schedule Lower Ground Floor Plan A-1700 Rev B

Existing Wall Schedule Ground Floor Plan A-1710 Rev B

Existing Wall Schedule First Floor Plan A-1720 Rev B

Existing Wall Schedule Second Floor Plan A-1730 Rev B

Proposed Landscape Plan A-1205 Rev B

Existing and Proposed Lower Ground Floor Plan A-1010 Rev B
Existing and Proposed Ground Floor Plan A-1020 Rev B
Existing and Proposed First Floor Plan A-1030 Rev B
Existing and Proposed Second Floor Plan A-1040 Rev B
Existing and Proposed Roof Plan A-1050 Rev B
Existing and Proposed Front Elevations A-1100 Rev B
Existing and Proposed Lower Ground Elevations and Sections A-1105 Rev B
Existing and Proposed Rear Elevations and Sections A-1110 Rev B
Existing and Proposed Side Elevations and Sections A-1120 Rev B
Existing and Proposed Side Elevations and Sections A-1130 Rev B
Listed Building Appraisal and Heritage Impact Assessment
Design and Access Statement
Received 2nd December 2022

Relevant Planning History:

27-33 Christchurch Road

210413/Ful and 210414/LBC Part converting an existing house and 9 flats to 12 flats including extensions to lower ground and ground floors. Refused.

29 Christchurch Road

180174/LBC Refit kitchen and bathroom. External walls to be re-pointed and re-plaster and re-paint interior walls. Replace flooring and fix any damp issues. Permitted.

940663/LBC Fitting of two ventilators (one internal). Permitted.

Internal Consultation Responses:

Conservation and Urban Design Officer: Object, discussed below.

Natural Environment Officer: Object; discussed further below.

Transport Officer: No comments received. However, no objection raised under application 210413 for similar proposals subject to conditions and informatives.

External Consultation Responses:

Conservation Area Advisory Committee: Object. Concerned with (in summary):

- Property being allowed to deteriorate
- Potential for improvements welcomed; however, extensions unsympathetic, interior works difficult to decipher, works silent on poor conditions of windows and doors

Civic Society: No comments received.

Public consultation:

Neighbour letters were sent to the occupiers of nearby properties and a site notice was put up. Advertised in local press on 7th September 2023.

2 letters of objection received concerned with (in summary):

3 letters of support/observations received, commenting on (in summary):

- Concerns over bin store location but opportunity to enhance appearance of properties

- Anti-white graffiti paint should be used
- Design looks good and improvement on existing state
- Extension fits perfectly, improvement to Kendrick Road

Summary of discussions with applicant/agent:

The agent was advised of concerns relating to the proposal and given the opportunity to withdraw the applications. The applicant confirmed that they wished to receive the decision notice with a view to appealing, hence the issuing of this decision notice within the agreed extended determination period.

No formal pre-application advice was sought prior to the submission of this application.

Equality Act 2010:

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

Relevant Planning Policy and Guidance and Legal Context

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

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

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).

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).

Accordingly, the following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (2023)

National Planning Policy Guidance (2014 onwards)

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC3: Adaption to Climate Change

CC5: Waste Minimisation and Storage
CC6: Accessibility and the Intensity of Development
CC7: Design and the Public Realm
CC8: Safeguarding Amenity
CC9: Securing Infrastructure
EN1: Protection and Enhancement of the Historic Environment
EN3: Enhancement of Conservation Areas
EN6: New Development in a Historic Context
EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland
EN15: Air Quality
EN16: Pollution and Water Resources
H1: Provision of Housing
H2: Density and Mix
H3: Affordable Housing
H5: Standards for New Housing
H8: Residential Conversions
H10: Private and Communal Outdoor Space
TR1: Achieving the Transport Strategy
TR3: Access, Traffic and Highway-Related Matters
TR5: Car and Cycle Parking and Electric Vehicle Charging

RBC Supplementary Planning Documents

Affordable Housing SPD (2021)
Revised SPD on Planning Obligations under Section 106 (2019)
Sustainable Design and Construction SPD (2019)
Revised Parking Standards and Design SPD (2011)
Residential Conversions SPD (2023)

Other relevant documentation / guidance / legislation

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

Appraisal

Land use considerations

Policy H8 (Residential Conversions) recognises that residential conversions have an important role to play in housing land supply in Reading. It also recognises, however, that the significant loss of family housing can erode the character of an area through insensitive individual

conversions and that the quality of conversions can also be poor with poor standards of accommodation.

Given the above, Council's policies seek to deliver appropriate residential conversions whilst maintaining a supply of family housing. In this regard, Policy H8 states that proposals to convert properties into self-contained flats will only be acceptable where:

- The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of family housing and
- At least 25% of the units formed and, where there are 4 or fewer units at least one unit of accommodation, should be suitable for family occupation with a minimum of two bedrooms

Further to the above, the Residential Conversions SPD states that the Council believes that conversions which provide family-sized accommodation with direct access to a usable area of private amenity space will result in the 'best use' of amenity space.

With regard to the above, No.29 Christchurch Road is a 4 bed house. This would be lost as a result of the proposals. Whilst the proposal incorporates 4 x 2 bed units, that could be classed as family sized accommodation, none of these units would have access to any private amenity space. The two bed units would be situated within the first and second floors.

The proposal would result in the loss of family housing as a result of the conversion of No.29 Christchurch Road and the failure to replace with good quality family housing on site. The units that could be considered family housing (4 x 2 bed units) would not have access to any private garden amenity space. The proposal would therefore be contrary to Policies H8 (Residential Conversions) and H10 (Private and Communal Outdoor Space) of the Reading Borough Local Plan 2019 and the Residential Conversions SPD 2023.

Design considerations and impact on heritage assets

Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. Policy H10 (Private and Communal Outdoor Space) states that "the design of outdoor areas will respect the size and character of other similar spaces in the vicinity".

The site lies within the Christchurch Conservation Area and as such there is a duty imposed by Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring decision makers to have special regards to the desirability of preserving or enhancing the character or appearance of a Conservation Area. This is reflected in Policy EN1 (Protection and Enhancement of the Historic Environment) which states that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. Policy EN3 (Enhancement of Conservation Areas) requires that the special interest, character and architecture of Conservation Areas will be conserved and enhanced and that development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Further to this, Policy EN6 (New Development in Historic Context) states that in areas characterised by heritage assets, the historic environment will inform and shape new development. The Council will, therefore, have regard to both the quality of the townscape and the quality and interest of the area, rather than solely that of the individual building.

Paragraph 135 of the NPPF 2023 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.

Paragraph 205 of the NPPF 2023 details that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 206 of the NPPF 2023 details that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 208 of the NPPF 2023 details that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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'.

Significance of heritage assets

The NPPF 2023 defines significance as the "*value of a heritage asset to this and future generations because of its heritage interest.*" The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1. The NPPF 2023 states that "*Significance derives not only from a heritage asset's physical presence, but also from its setting.*".

The terrace at 3-33 Christchurch Road, comprising of Grade II listed buildings, within the Christchurch Conservation Area, is described as an important townscape value in the conservation area appraisal, which also has a distinguishing character due to its mature gardens within the Christchurch Conservation Area.

In this case, the significance of the building lies not only with its historic fabric, form, and architectural expression/detailing but also its position and site layout with mature green that contributes to the character of the conservation area.

Impact on heritage assets

External

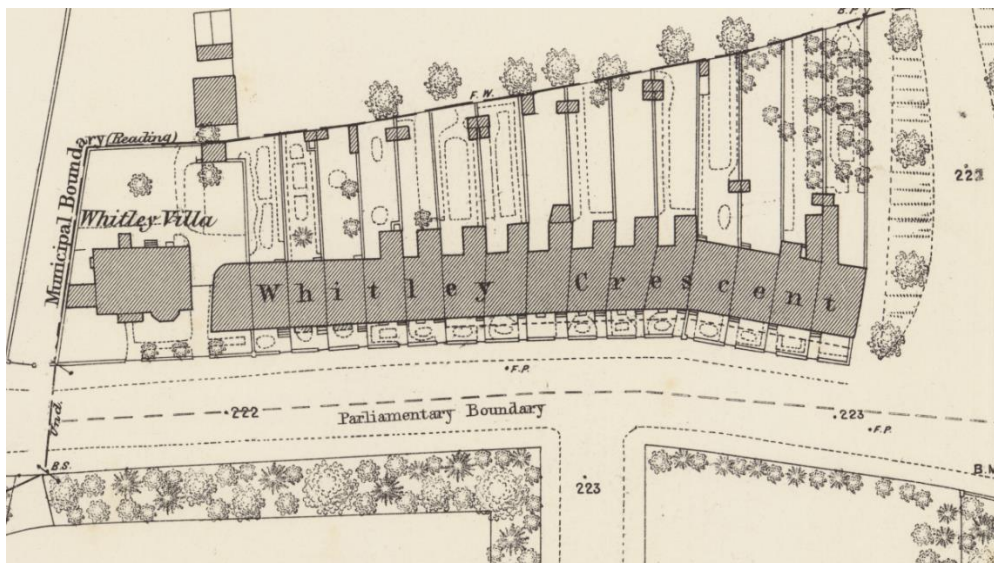
The listed buildings have brickwork rear elevations and two bay organisation with historic building openings at upper levels, both to rooms and at half levels for the staircases, part of the architectural and historic significance. This elevation is also visible from the public realm.

Historically, as appears on the OS Maps below, there were historic single-storey extensions of No. 31 and 33, while access to the rear gardens of No. 27 and 29 was provided by the steps

positioned close to their western boundary on their rear elevations. With the possibility of original service rooms located in the basement and within the historic extensions, which were of modest scale, the buildings have undergone current flat-roofed single-storey additions after 1950. However, it is noted that the existing extensions could also be considered minor in scale, not totally visible from the public realm, with little harm, although they are not the product of an architectural design.



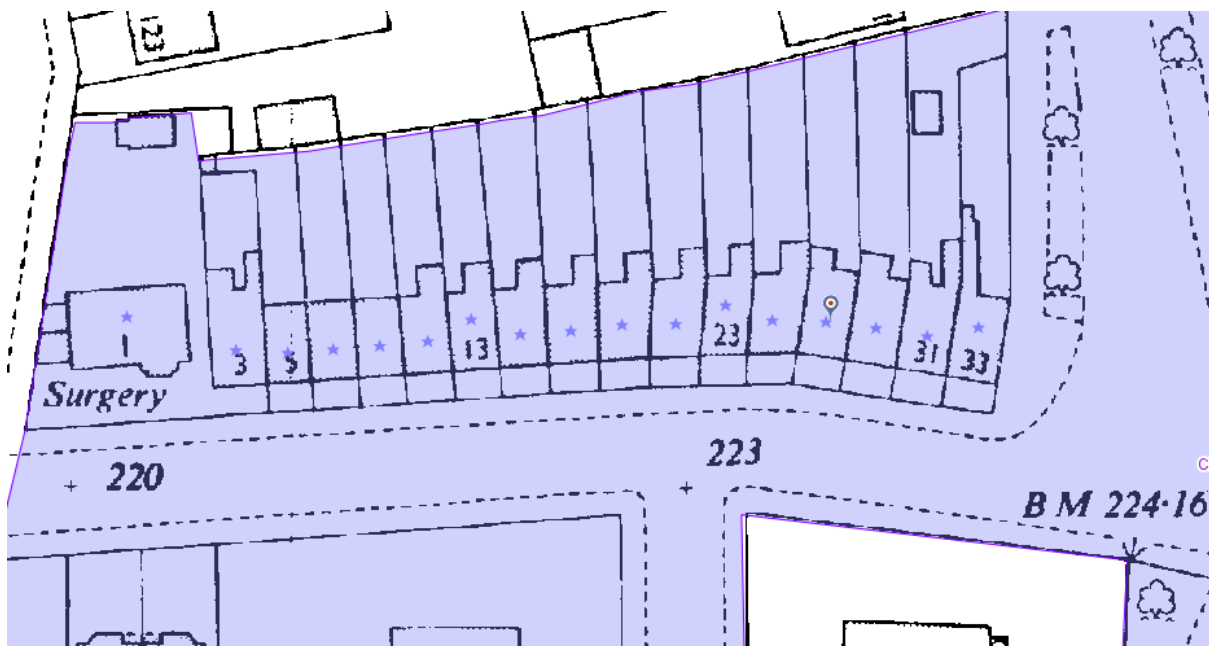
OS Map of 1872-1873 (published in 1883)



OS Map of 1879 (steps and historic extensions are visible)



OS Map of 1938 (published in 1947)



The 1950s from the Council's Historic Mapping Tool

The proposals would replace the existing small-scale single-storey rear extensions with two-storey extensions, which would occupy the full width of the listed buildings, blocking the original ground floor windows. In addition, due to the proposed new use and internal layout alterations, one of the original first-floor windows of No. 33 and another of No. 29 would be removed, and new windows/openings would be inserted on the rear elevation. This would harmfully disrupt the architectural expression of the rear elevation, loss of historic fabric and legibility of the rear.

It is acknowledged that effort has been made to attempt to create a more sympathetic design solution since applications 210413 and 210414 were withdrawn. However, the bulk, the roof form, and the height of the proposed extensions would look dominant, not respecting the historical and architectural features of the listed buildings nor the setting. Given the sites prominent location, the extensions would be highly visible in views from both Christchurch and Kendrick Road and, given the above, would not preserve or enhance the character or appearance of the Conservation Area.

Internal Works

The proposed extensions and use would result in the loss of historic fabric and unacceptable changes in terms of proposed new openings in the original rear walls of the listed buildings, legibility of internal circulation and layout by the introduction of new walls, bathrooms and kitchens, and removal of historic elements of timber boarding and fireplace.

Lower Ground Floor

It is known that historically, the services were either put within this (lower ground or basement) floor or inside the extensions of later Regency / early Victorian houses. Whilst the proposed layout for No. 27 would keep the existing positions of the bathroom and kitchen, it would demolish both the rear wall and the original internal wall dividing the existing bedroom and living room.

For No.s 31 and 33, new kitchens and bathrooms would be put inside the original house, although they are placed within the current extensions. This would again affect the historic fabric of the houses, creating some damage due to the removal of the original walls and installation of new pipes.

With regards to the building at No. 29, the same plan layout is proposed without any conservation approach for timber boarding and fireplace despite the submitted wall schedule showing these elements as original. It is also stated by the Listed building Appraisal and Heritage Impact Statement that this building has the changes internally.

Ground Floor

A similar arrangement is proposed for the ground floors, as new bathrooms and partitions would alter the internal layout, resulting in a loss of legibility of the original plan. Again, without any information on the new plumbing route and its impacts, works to the ground floors cannot be supported.

Reinstatement of the staircase for No. 33 is noted as only beneficial work. However, this does not outweigh the harm to the original layout and use of rooms, walls and openings.

First Floor

Works to the first floors of the listed buildings could be considered the least harmful as they include renovation of the existing kitchen and living room, which are not imposing and simple to read from the original plan form.

Second Floors

The introduction of a bedroom with en-suite bathrooms and/or bathrooms on this floor means further erosion of historic fabric. Without justification and details of bathroom installations, the proposal cannot be supported, although the circulation of this floor would be appropriate.

The proposed separation of No. 31 and No. 33 would be welcomed and beneficial. However, again, there is no balanced approach to conservation and development for these properties that would be acceptable.

It is acknowledged that the current state of the properties detracts from the character and appearance of the area. It is further acknowledged that the existing buildings may require renovation. However, it is not considered that these applications will appropriately address these matters. Instead, given the above, the proposals would be harmful to the character of the listed building, would neither preserve nor enhance the character or appearance of the

conservation area and would therefore fail to protect the significance of these designated heritage asset.

The Planning (Listed Buildings and Conservation Areas Act) 1990 and the NPPF create a strong presumption against the grant of planning permission for development which will harm designated heritage assets, requiring particularly strong countervailing factors to be identified before this presumption can be treated as overridden.

It is considered that the scale of any extension to a Listed Building has to be tempered to the scale of the original building and respect elements of architectural and historic interest. Indeed, whilst there is no objection to a suitably designed rear extension, this should not be to the detriment of the architectural and historic integrity of the listed building and its setting. The applicant has been encouraged on several occasions to enter into meaningful pre-application discussions with the LPA and it is disappointing that there appears to be no desire to do so.

The proposed two-storey extensions, due to their inappropriate scale, massing and siting at the rear of listed buildings, would adversely impact the character and special architectural and historic interest of the designated buildings being visible from the public realm whilst failing to preserve or enhance character and appearance of the Christchurch Conservation Area. Proposed alterations to the existing fenestration and internal layout of the buildings would result in significant demolition and loss of historic fabric, surviving plan form, and retained original features, causing less than significant harm at the highest level to the significance of the heritage assets in conflict with Policies EN1, EN3 and EN6 of the Reading Borough Local Plan (2019) and Paragraph 205, 206 and 208 of the NPPF (2021) It is not considered that there is sufficient public benefit to outweigh the less than substantial harm to the significance of the heritage asset.

Amenity of future occupiers

Policy CC8 (Safeguarding Amenity) seeks amongst other aims to safeguard the living conditions of future occupiers of development. Policy H5 (Standards for New Housing) seeks that all new housing is built to high standards. Policy H8 (Residential Conversions) seeks that proposals to convert properties into self-contained flats will only be acceptable where adequate internal floor space is provided. Policy EN16 (Pollution and Water Resources) seeks to protect future occupiers from the impacts of pollution and Policy H10 (Private and Communal Outdoor Space) seeks that residential developments area provided with adequate private or communal outdoor amenity space.

The proposals are part conversion in nature, with large extensions to facilitate an increase from 9 flats and 1 house to 12 flats. Policy H5 requires that the proposals comply with the nationally-described space standard in terms of unit size. It is noted that Para 4.4.42 of the Policy states that “even where it does not apply, the nationally prescribed space standards offers a useful point of reference and a good basis for design of new developments”. In terms of unit size, the resultant flats at the lower ground floor level would largely meet the unit sizes at the minimum, with one unit (lower ground 29) falling short at 47m². At first and second floor level, the flats would just fall short (60m² instead of 61m²). However, more significantly, at ground floor level, the resultant flats of No’s 27, 31 and 33 as annotated would fall short (41m², 47m² and 44m² respectively 50m²).

Whilst on balance, the light wells at the front are considered to allow for sufficient light levels to lower ground floor flats of No’s 27, 31 and 33 as annotated, the same cannot be said for the

lower ground floor flat of No.29 as annotated, given that there is no light well to this property. The window serving this bedroom would largely be obscured by the existing hardstanding, restricting light and outlook to the sole window to the only bedroom of this unit.

In terms of amenity space, Policy H10 states that flats outside central Reading should provide 25m² per flat of outdoor space. Furthermore, it would be expected that larger units suitable for families would (2+ bedrooms) would have access to good levels of outdoor space. Whilst not explicitly stated within the submission, it would appear from the plans that occupiers of the lower ground floor flats - which would be one bed flats - would have access to the proposed garden. As such, the proposed two bedroom units (located on the first and second floors) that could be occupied by families, would have no access to any on-site garden space nor space for clothes drying etc.

Whilst it is recognised that the occupiers of No's 31 and 33 do not currently have any access to amenity space, the somewhat limited dedicated amenity space for future occupiers is considered to be a worse situation than existing given the proposed increase in number of units.

In these regards the numerous individual shortfalls identified, when considered cumulatively, result in an overall conclusion that the quality of accommodation for future occupiers would be contrary to Policies CC8, H5, H8 and H10 of the Reading Borough Local Plan 2019. It would also be contrary to the NPPF which aims to always seek to secure high quality of design and a good standard of amenity for all existing and future occupants of buildings.

Impact on neighbouring amenity

Policy CC8 (Safeguarding Amenity) which requires developments to not cause a detrimental impact on the living environment of existing properties in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; and Crime and safety.

In relation to No.25 Christchurch Road to the west, this property has the benefit of a rear extension adjacent the common boundary which itself would minimise the impact. Whilst the proposed extension may be visible to occupiers of this property, given that the two storey element would be set away from the boundary and the roof hipped away also, it is not considered to result in any significant overbearing impact. No windows are proposed on the flank elevation of the proposed extension facing this property and given that the proposed extension would be slightly angled away from the common boundary, it is not considered to result in any material loss of privacy.

In relation to No.124 Kendrick Road, to the north, this property has two bedroom windows on its flank elevation. There would be a distance of approximately 15m from the proposed rear extension to the north common boundary at its closest point, and slightly further to No.124 itself. Policy CC8 references 20m between dwellings as usually being appropriate; however, that is specifically in reference to back-to-back relationships, rather than back to side as in this instance. Given the orientation of No's 27-31, views across to No.124 would be at angle (with the windows to No's 31 and 33 facing towards the front drive of No.124). Whilst there might be a slight perception of overlooking, given the above and the distance, it is not considered to result in such significant loss of privacy to the occupiers of this property to warrant a refusal on this basis. Similarly, given the distance, the proposals are not considered to result in any overbearing effects to the occupiers of this property.

Should the application have otherwise been recommended for approval, conditions would have been used to protect neighbours from noise and dust during the construction period. A construction method statement would also have been secured via condition to manage the highway safety perspective. As such in overall terms, considering all nearby residential occupiers, no significantly harmful amenity impacts would occur to neighbours and with conditions the proposal could comply with Policy CC8 in particular.

Trees/Landscaping

Policy CC7 (Design and the Public Realm) seeks that development is of high design quality and maintains and enhances the character of the area in which it is located including landscaping. Policy EN14 (Trees, Hedges and Woodlands) requires new development to make provision for tree retention and planting.

The site is located within the Christchurch Conservation Area, an Air Quality Management Area and in a low canopy ward and as such tree retention and planting are important. The Christchurch Conservation Area Appraisal notes that the blending of architectural styles of property in close proximity to the core of the area which makes the area attractive and worth of Conservation Area status, is 'reinforced by the retention of boundary walls and railings throughout the area, which together with mature tree cover, give the area its coherence'. The Appraisal further states that trees 'make a significant contribution to this suburban Conservation Area's special character and sense of identity'.

It is noted that the application form incorrectly states that there are no trees near the proposed development and that no trees would be affected by it.

With reference to the Existing Landscape Drg. No. A-1200 Rev B and to the Design Statement, the Council's Natural Environment Officer has noted the following:

- It appears the existing tree and shrub vegetation at the rear is not accurately shown on the Existing Landscape drawing - this is demonstrated by the rear elevation of no. 29 photograph at page 5 of the Design Statement which shows small trees and shrubs growing near the rear elevation.
- We have no records of a tree works in a Conservation Area notification on file to remove these trees, as such it is assumed the photo is accurate.
-

The proposed extensions and the Proposed Landscape Plan Drg. No. A-1205 Rev B imply these trees will be removed to enable development. The Council's Natural Environment Officer has confirmed that there are no objections in principle to removing this vegetation as it does not grow at a suitable location in relation to the building and it is of a small size (hence easier to replace in terms of canopy cover and amenity). However, if removal of these trees is in the case, the proposal should demonstrate appropriate replacement planting in line with the Council's Tree Strategy aims and Policy EN14.

In addition, there is a lack of consistency for the existing / retained / new vegetation in the rear gardens between the Existing Landscape and the Proposed Landscape plans and no tree survey or Arboricultural Impact Assessment has been provided.

Given the location of the site (Conservation Area, Air Quality Management Area, low canopy ward) it is important that the proposal demonstrates lack of harm to existing vegetation or, where not possible, proposes replacement planting with a 1:2 ratio. The proposed Landscape Plan is too inaccurate to demonstrate landscape principles or replacement planting.

Given the above, the proposed development fails to properly acknowledge - and thereby fails to demonstrate - that the proposals would not result in a detrimental impact to existing trees and vegetation on site. In addition, the development fails to provide sufficiently detailed landscape proposals to demonstrate that the proposals would not result in a loss of canopy cover. The proposed development is therefore contrary to Policies EN14 and CC7 of the Reading Borough Local Plan 2019 and the objectives of the Tree Strategy 2021. It would also not comply with the Sustainable Design and Construction SPD 2019 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'.

Impact on Parking/Highways

Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway-Related Matters) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.

No comments have been received. However, comments were received under application 210413 and no Transport objection was received.

Christchurch Road (A327) is a main transport corridor and is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically, this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

Currently, 5 car parking spaces are used for the existing 9 flats and one house, which are accessed from Kendrick Road. The proposed development, which would see an increase in the number of units to 12, would not be provided with any additional off-road parking. However, it is noted that the existing layout would not change.

Given the site's location and the extensive parking restrictions in place including the operation of the Council's Residential Parking Permit Scheme, a lower parking provision could be considered in this instance. However, under the Borough's current parking standards, the proposals would generate additional pressure for parking in the area and, therefore, there would be an assumption that any future occupants of the proposed flats would not be issued with resident parking or visitor permits. Should the application have otherwise been considered acceptable, conditions would have been attached in this respect to ensure that the development would not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 0.5 cycle parking spaces per flat. These facilities should be provided within a secure covered store. This has not been illustrated on plans, but the Transport Officer confirmed under application 210413 that this could have been secured by way of a suitably worded condition and as such does not form a reason for refusal.

A bin storage area is indicated in the submitted plans located at the rear of the property. This should be located no further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods.

Given the scale and location of the development a Construction Method Statement would have been required and would have been secured by way of condition.

Sustainability

The proposals propose both conversion of the 4 existing residential buildings, and a large extension across the 4 properties to facilitate the conversion and 2 additional units.

In respect of the conversion elements, Policy CC2 (Sustainable Design and Construction) requires that “*All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘VERY GOOD’ standards, as a minimum*”. With regard to the proposed extension, Policy H5 (Standards for New Housing) requires that all new build housing integrate additional measures for sustainability.

It is acknowledged that the proposals, as largely a refurbishment proposal and conversion of existing buildings do not neatly align with the standard BREEAM requirements. Furthermore, Officers acknowledge additional inherent difficulties incorporating substantial sustainability improvements within a scheme such as this, due to the Grade II listing which is a substantial constraint in this respect. Notwithstanding, no specific information has been submitted in relation to the sustainability credentials of the proposed development and the LPA do not accept, without supporting evidence that little could be achieved in terms of sustainability. However, this is not considered basis to refuse the application. Rather, given that no substantial details have been submitted, and should the proposals otherwise have been acceptable, conditions would have been attached to application 221806/FUL requiring submission of BREEAM certificate to provided or for an alternative sustainability assessment addressing the requirements of Policy CC2 to be submitted alongside conditions to ensure the development meets the following requirements:

- Higher water efficiency standards of 110 litres per person per day; and
- A 19% improvement over building regulations energy requirements

Although secured by planning condition, these requirements would have been administered through the Building Regulations. Confirmation of compliance would need to be submitted to the LPA to have discharged the condition.

Affordable Housing

The proposals incorporate a sizeable two storey extension across the 4 properties to facilitate the additional two units. Therefore, a contribution towards off-site affordable housing provision is required as part of the application in accordance with Policy H3 (Affordable Housing) of the Reading Borough Local Plan and the Affordable Housing SPD under Section 106 of the Town and Country Planning Act 1990.

The applicant stated they agreed in principle to enter into a legal agreement to secure a financial contribution and valuations have not been submitted. Given the proposal is not considered acceptable in other planning terms, the Council has not pursued the S106 legal agreement to secure the financial affordable housing contribution.

By default, the absence of a section 106 legal agreement or unilateral undertaking to secure the required financial contribution is considered to represent a further reason for refusal of application 221806/FUL. An informative will specify that this reason for refusal

could be overcome, in the context of an acceptable scheme in all other respects, by entering into an s106 or unilateral undertaking.

CIL

The proposal would be a Community Infrastructure Levy (CIL) liable development. Whilst the applicant has provided the appropriate CIL Additional Information Form, this has not been completed. An informative would have been attached to any planning permission to advise the applicant of their responsibilities in this respect.

Other matters raised in representation

All material considerations covered in the above report.

Conclusion

The various shortfalls of the proposals are such that in overall terms these concerns override any merits. These concerns are largely heritage/conservation and amenity based. In overall terms these concerns are so significant so as to count against the proposals when considering all relevant material considerations. Accordingly, within the context of national and local planning policies, as detailed in the appraisal above, full planning permission is recommended to be refused. Similarly, listed building consent is also recommended for refusal.

RECOMMENDATION

Refuse Full Planning and Listed Building Consent