

Planning Statement

Construction of an additional storey to provide 3 additional flats (7 flats in total).

72 A-D Admirals Court, Reading, RG1 6SW
May 2022



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1.0 Introduction

- 1.1 Arrow Planning have been instructed by Mr Umut Calkam (the ‘Appellant’) to prepare this Planning Statement (‘PS’) to assist Reading Borough Council (‘the Council’) with their determination of a full planning application for the following development:

‘Construction of an additional storey to provide 3 additional flats (7 flats in total).’

- 1.2 At 72 a-d Admirals Court, Reading, RG1 6SP (the ‘Site’).

- 1.3 This application follows the refusal of prior approval notification application reference 201480/FPA, refused on 9th February 2021, with the subsequent appeal dismissed 14th January 2022. That development was for:

“Construction of two additional storeys to provide 6 x 1 bed flats (10 flats in total). Prior Notification under Class A, Part 20, of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).”

- 1.4 This PS considers the proposed development against relevant Development Plan Policies and all other material considerations.

- 1.5 The application submission is accompanied by the following plans and documents:

- Application Forms
- Covering Letter
- CIL Forms
- Planning Statement
- Transport Note
- Flood Risk Assessment
- Application Drawings:
 - Proposed Plans, Drawing Number 1375-P10
 - Proposed Elevations, Drawing Number: 1375-P11
 - Site Plan and Location Plan, Drawing Number 1375-P12
 - Existing Floor Plans and Elevations, Drawing Number: 1375-SUR1-A

- 1.6 The Planning Statement is structured as follows:

- Section 2.0 describes the site and its surroundings
- Section 3.0 describes the relevant planning history
- Section 4.0 summarises the application proposals
- Section 4.0 outlines the relevant planning policy framework for the determination of the application
- Section 5.0 provides the development management
- Section 6.0 draws a conclusion

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- 1.7 The proposals will provide policy compliant, sensitively designed housing, making a positive contribution to Borough's housing supply, overcoming the reasons for refusal on the prior notification application. In accordance with the NPPF, the application should be approved without delay.

2.0 Site and Surroundings

- 2.1 The Site is broadly rectangular in shape. Located centrally within the Site is a three-storey block of flats with the third storey of accommodation provided within the roof space. The building is finished in brick at ground floor level with render at first and second floor level and a tiled roof. The front of the property provides car parking for four vehicles, whilst the rear of the property provides a communal amenity area.
- 2.2 Admiral's Court is a relatively recent development. The area comprises a mix of 2, 3 and 4 storey developments, with the application building being one of the smallest scale buildings in the street. The surrounding buildings comprise a mix of brick and render.
- 2.3 The Site is located 0.6 kilometres (as the crow flies) south of the designated central area and primary shopping area of Reading. Reading town centre offers a full choice of day-to-day services, employment opportunities and shopping.
- 2.4 With reference to Google Maps¹, travel times to key amenities are listed below:

Location	Distance Miles	Distance Kilometres	Walk	Cycle	Bus	Car
Town Centre	0.9	1.4	12 mins	5 mins	c.12 mins	4 mins
Central Reading Station	1.1	1.7	22 mins	7 mins	c.14 mins	6 mins
Reading West	1.8	2.8	29 mins	11 mins	c.24 mins	8 mins

- 2.5 The site is not located within close proximity of any heritage assets and is located within Flood Zone 1, in an area with low probability of surface water flooding. The site is located within an Air Quality Management Area (AQMA).

¹ Travel times taken on April 2022.

3.0 Relevant Planning History

3.1 The relevant planning history for the site is below:

App ref:	Description of Development	Decision
88/TP/257	Residential development comprising 151 units, indoor swimming pool, roads and ancillary drainage works at land west of Rose Kiln Lane, Reading	Approved 7/11/88
96/0374/FD	Redevelopment of covered swimming pool by erection of two storey block of 4 x 2 bedroom flats, parking and amenity space	Refused 12/8/96 – would result in an unsatisfactory amount of useable amenity space.
96/0664/FD	Redevelopment of covered swimming pool by erection of two storey block of 4 x 1 bedroom flats, parking and amenity space	Approved 25/10/96
140603/FUL	Demolition of pool complex and erection of building comprising 4x2 bed flats, with associated car parking	Approved 17/03/17
160803/FUL	Demolition of swimming pool complex and erection of building comprising 6x1 bed flats	Withdrawn 01/11/16
170556/APC	Approval of details reserved by conditions 3, 4, 7, 8, 9, 10, 11, 12 and 13 of planning permission 140603/FUL	Discharged 28/06/17
201480/FPA	Construction of two additional storeys to provide 6x1 bed flats (10 flats in total). Prior Notification under Class A, Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)	Refused 09/02/21 Appeal Dismissed 14/01/22 (see below)

3.2 The existing flats were constructed under planning consent 140603/FUL with conditions subsequently approved under 170556/APC.

3.3 A prior notification application for the addition of 2 additional storeys was refused under application ref 201480/FPA and dismissed at appeal (APP/E0345/W/21/3277610). Reasons for refusal (RFR) are as follows:

1. The applicant has failed to demonstrate that the proposed development would not have a material detrimental impact on the functioning of the transport network. The proposed on-site parking provision is inadequate, intensifying existing parking pressures and compromising the safety of users of the transport network including pedestrians and cyclists. The proposal is therefore contrary to A.2 (1) (a) of Class A, Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

2. The proposed building has an over-scaled appearance, disproportionate to the prevailing character of the area. The large, blank flank elevations are oppressive and the building lacks texture and depth. The extent of render to the upper floors would contrast starkly with the general appearance of blocks at Admirals Court. This represents poor design. The proposal is therefore contrary to A.2 (1) (e) of Class A, Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

3. By virtue of its additional height, the proposed development would cause detrimental harm to the residential amenities of the occupiers of flats with windows to the northward elevation of Block 64-72 Admirals Court in terms of visual dominance, overbearing effects and loss of privacy through overlooking. The proposal is therefore contrary to A.2 (1) (g) of Class A, Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

4. Insufficient information has been provided to demonstrate the accurate date of construction of the building. It is likely that the building was under construction after 5th March 2018. The proposal is therefore contrary to A.1 (c) of Class A, Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

- 3.4 In determining the appeal, the Planning Inspector did not agree with the Council's first and second reasons for refusal. The reason the appeal was dismissed was limited to the third and fourth reasons relating to impact on the amenity of the lower floors of Block 64-72 (to the south) and with regards to information supplied regarding the date of construction (relating to permitted development allowances).

4.0 Application Proposals

- 4.1 The application proposes the erection of an additional floor to the building providing 3 new self-contained units, creating 7 units in total within the building. Of the 3 units, 2 will be located on the second floor with a further unit located within the roof space. The units are the following sizes:

Second Floor

- Flat 5 – GIA 51 m² – 1 Bed 2 person
- Flat 6 – GIA 44 m² – 1 Bed 1 person

Roof Space

- Flat 7 – GIA 50 m² – 1 Bed 2 person

- 4.2 The alterations to the building will result in the existing first and second floor maisonettes being amended, resulting in two 1 bedroom flats at first floor level.
- 4.3 The revised design of the building will have facing brickwork at first and second floors with the front gable end projection at second floor to be rendered, following the pattern with surrounding buildings. The dormer windows and rooflights will match that of the existing building, being 2 small dual pitched dormers to the front and back with rooflights set in between. The roof will also match the existing, being tiled, with solar panels on the south facing roofslope.
- 4.4 Parking and access will remain unchanged with the site utilising the existing access, which leads to Rose Kiln Road, and retaining the 4 parking spaces to the front of the building.
- 4.5 To the rear of the flats the communal amenity space is to be retained, with provision of recycling/waste storage and cycle storage.

5.0 Relevant Planning Policy & Guidance

The Development Plan

5.1 The current Development Plan comprises:

- Reading Borough Local Plan (RBLP) (2019)

Reading Borough Local Plan (2019)

- 5.2 Policy CC1: Presumption in Favour of Sustainable Development, states that ‘a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.’.
- 5.3 Policy CC2: Sustainable Design and Construction states proposals for new development will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 5.4 Policy CC7: Design and the Public Realm, states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 5.5 Policy CC8: Safeguarding Amenity , notes that development will not be permitted if it causes a detrimental impact on the living environment of existing residential properties.
- 5.6 Policy H1: Provision of Housing notes that provision for over 15,000 homes within Reading Borough will be made within the plan period.
- 5.7 Policy H2: Density and Mix states that the appropriate density of residential development will be informed by the character and mix of uses of the area in which it is located, including the housing mix; its current and future level of accessibility by walking, cycling and public transport; the need to achieve high quality design; the need to maximise the efficiency of land use; and the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 5.8 Policy H5: Standards for new housing notes that all new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard and be built in accordance with building regulations.
- 5.9 Policy H10: Private and Communal Outdoor states flats may be provided with communal outdoor space, balconies and/or gardens and should respect the size and character of other similar spaces in the vicinity.

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- 5.10 Policy EN15: Air Quality notes that development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 5.11 Policies TR1, TR3 and TR5 address highways matters including accessibility, safety and parking, ensuring that there are no significant impacts.

Other Policy and Guidance

National Planning Policy Framework (NPPF, July 2021)

- 5.12 In addition to the local policies referred to above, the following national policies are of particular relevance to this submission.
- 5.13 NPPF Paragraph 8 seeks notes the 3 overarching objectives of the planning system to achieve sustainable development: economic, Social and Environmental. It notes the the system should *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'*.
- 5.14 NPPF Paragraph 11 notes that there is a presumption in favour of sustainable development and that development proposals that are in accordance with the development plan, promote growth and infrastructure, improve the environment, mitigate climate change should be granted planning permission without delay.
- 5.15 NPPF Paragraph 60 states that in order *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*.
- 5.16 NPPF Paragraph 69 makes clear that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly and that local planning authorities should support the development of windfall sites through their policies and decisions.
- 5.17 NPPF Paragraph 119 states *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*
- 5.18 NPPF Paragraph 120 notes that planning policies and decisions should *'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs'*.

Relevant Supplementary Planning Documents (SPDs)

- Affordable Housing SPD (2021)

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- Sustainable Design and Construction SPD (December 2019)
 - Revised Parking Standards and Design (October 2011) DCLG
 - Technical housing standards – Nationally described space standard (2015)

6.0 Development Management Assessment

Principle of Development

- 6.1 The existing site contains 4 self-contained flats and associated parking and open amenity space. The principle of the use of the land for residential is therefore established and the proposals would simply seek to increase the number of units on the site.
- 6.2 The design of the building has been reduced by one storey since the prior notification submission; the resultant development having 4 floors of accommodation, including within the pitched roof. It is noted that all of the closest buildings to the site are the same scale as the proposals:
- 65-72 Admirals Court - Located immediately to the south of the site – 3 storey block with pitched roof.
 - 31 -39 Admirals Court – Located to the south east of the site, the opposite side of Admirals Court Road – 3 storey block with pitched roof.
 - 19-30 Admirals Court – Located to the south east of the site – 3 storey block with accommodation within the pitched roof.
 - 13-18 Admirals Court – Located to the east of the site – 3 storey block with pitched roof .
 - 1 – 12 Admirals Court – Located to the north east of the site – 3 storey block with accommodation within a the pitched roof
- 6.3 The development would therefore clearly be in character with the surrounding area, matching the scale of the existing buildings.
- 6.4 The provision of housing would contribute towards '*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*' in accordance with paragraph 8 of the NPPF and would also make effective use of brownfield land in accordance with paragraph 119. It would contribute to meeting the need for additional housing in accordance with Policy H1 of the RBLP whilst also creating a density informed by the mix and character of the area.
- 6.5 The site is also located in a highly sustainable location with good accessibility to amenities and public transport, being located just outside the town centre, complying with the objectives of policy CC1 and H2. The proposed development in principle is therefore acceptable.

Design and Impact on the Streetscene

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- 6.6 The design of the building has been significantly altered since the previous prior notification submission. It is noted that the Inspector in their decision did not object on to the impacts of the proposals on the external appearance of the building, concluding in para 24 of their decision that *‘the external appearance of the building would be acceptable’*. However, whilst the Inspector did not object to the proposals on design grounds, points raised in their assessment have been taken into account in the redesign, including a reduction in the use of render.
- 6.7 The proposals would use the existing built form of the building extending one storey higher, to create a 3 storey building with accommodation in the roofspace. As noted in paragraph 6.2 above, all of the neighbouring buildings in the vicinity are the same scale and therefore the building would be entirely in context with its surroundings.
- 6.8 The use of render has been restricted to the second floor front gable end, with the remaining building being brick – this is considered an improvement on the existing building which is rendered at first floor. This would be in keeping with the surrounding buildings, which use the same style, and would assist in integrating the building into the surrounding context.
- 6.9 The design of the building has been reduced in height from the previous submission and would be fully in keeping with its surroundings. Points raised by the inspector in relation to the use of render have been addressed, with the render on the building being limited to the second floor gable end. The proposals would match the character and scale of its surroundings and be of a design that maintains and enhances the character and appearance of the surrounding area in line with Policy CC7 (Design and the Public Realm) of the RBLP and would therefore be acceptable.

Amenity of neighbouring residents

- 6.10 The building would sit on the same footprint of the existing, extending the building upwards by one floor. Responding to the appeal decision, the proposals are significantly smaller than the prior notification application refused.
- 6.11 The Council’s third reason for refusal stated that the development would cause detrimental harm to the amenities of Block 64-72 Admirals Court *‘in terms of visual dominance, overbearing effects and loss of privacy through overlooking’*. In coming to their conclusion on the subsequent appeal, the Inspector noted that the proposals would *‘substantially increase the height of the existing building’* and the impact of this would have an overbearing impact on the residents of these flats, concluding that the impacts to outlook would not be acceptable. However, the Inspector did not agree with the Council’s decision with regards to privacy, noting that they were satisfied that the proposals would not amount to adverse impacts in this regard.
- 6.12 The Inspector noted in their assessment of the previous scheme that the substantial increase in height had created a loss of outlook for the lower level flats. The new proposals reduce the height of the building by an entire storey from the previous proposals, being a significant reduction in height.

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- 6.13 Accordingly, it is considered that the proposals overcome both the Council and Inspector's concerns by virtue of the reduction in height.
- 6.14 The previous submission also did not set out the layout of the neighbouring units, this has been set out on the Proposed Site Plan – Drawing number 1375-P12 – with this indicating that the only window affected on the neighbouring flats would be 'Bed 2' of the southern ground floor flat of 64-72. It is noted that this is a secondary bedroom, with the flat being triple aspect, with further outlook to the north from Bedroom 1, and the open plan Kitchen and Living Area having both eastern and southern facing windows.
- 6.15 The significant reduction in height of the building vastly improves the outlook from the neighbouring flats from the previous submission. This coupled with the only window being affected by the proposals being a secondary bedroom, would not result in an unacceptable impact on occupiers of the neighbouring unit. The development would therefore not cause harm to the living environment to surrounding residents in accordance with Policy CC8 (Safeguarding amenity) of the RBLP.

Amenity of future residents of the building

- 6.16 All of the proposed flats would meet the national space standards, would be dual aspect and be provided with good levels of natural light. The flats would be stacked to follow the existing layout, reflecting the layout of the flats below to assist with noise transmission.
- 6.17 Communal amenity space is provided to the rear of the building, as per the existing, providing the occupants of both the existing and proposed flats adequate amenity space. It is also noted that Coley Recreation Ground is located 100m to the west as the crow flies which provides a large area of public amenity space for the occupants of the flats. The development would therefore be in accordance with policy H10 (Private and Communal Outdoor Space) of the RBLP which states flats may be provided with communal outdoor amenity space and spaces which would respect the size and character of other similar spaces in the vicinity.
- 6.18 The location of the development within an AQMA was previously assessed in application 140603/FUL and deemed acceptable. The application would be an extension to an existing building and would introduce a very small increase in the number of units, with no further adverse impacts to the AQMA as discussed in the Transport and Highways Section below.
- 6.19 Given the proposals relate to the reconfiguration of the upper floors of an existing block of flats, accessibility will be limited to the upper floors. However, it would not be feasible as part of this scheme to retrofit the building for step free access to the upper floors.
- 6.20 The proposed flats, as demonstrated above would provide a high standard of living conditions for future occupants of the flats on compliance with policy CC8 of the RBLP.

Highways and Refuse

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- 6.21 The proposed development would be located within a sustainable location, demonstrated by the table in paragraph 2.4, and would utilise the existing access and parking spaces available. The application is supported by a Transport Technical Note which assesses parking availability around the Site using the Lambeth Methodology and publicly available census data to assess the likely level of demand for parking in the area. The Technical Note undertook two surveys and the area was found to have a good level of parking availability at 50% and 42% respectively. This is well below the 85% threshold where areas are generally considered to be at parking stress. In terms of vehicle ownership 50% of households in flatted developments do not own a vehicle, which broadly correlates with the existing development where only 1 of the 4 unallocated available parking spaces was in use at the time of the surveys. From this information it can be concluded that there is sufficient capacity both on site and on street to accommodate any increase in demand associated with the appeal proposal.
- 6.22 Within the submission reference 201480/FPA the same parking arrangements were proposed, however the increase in number of flats was 6 as opposed to the 3 currently proposed. In the subsequent appeal the Planning Inspector noted that car ownership for the flats was likely to be low, that there was no evidence that the area was under parking stress and there was no evidence that the 6 flats would exacerbate an existing problem. They concluded by noting that the Highways and Transport Impacts would be acceptable and accord with paragraphs 104 and 130 of the NPPF. The proposed development subject of this application is for 3 flats, 50% less than previously proposed (which was found acceptable in highway terms by the Inspector). There has been no material change in circumstances which would warrant a different view being found, therefore this scheme must be considered acceptable in relation to highways impacts.
- 6.23 Furthermore, given that there would be no increase in parking on site, and that the development is located within a sustainable location close to the town centre, the development would have no adverse impacts on the AQMA in compliance with EN15 of the RBLP.
- 6.24 Bin stores and cycle storage will be provided to the rear of the unit, providing 4 new cycle spaces, meeting policy requirement for 7 x 1 to 2 bed flats and space complaint bin storage for the new units.
- 6.25 In view of the above the scheme would be acceptable in transport terms, and would therefore accord with requirements of policies TR2-TR5 and the NPPF.

Trees and Ecology

- 6.26 The development involves increasing the height of the existing building by one storey and would not result in the loss of any trees, hedges, or habitat at the site. The development would therefore not result in the loss of biodiversity in accordance with policy EN12 (Biodiversity and the Green Network).

Flooding and Drainage

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- 6.27 The development is located within Flood Zone 1 and seeks to increase the height of the building by a single storey, with no alterations to existing hardstandings around the site or volume of run off. A Flood Risk assessment has been submitted with the application and demonstrates that there are no concerns with regards to flood risk to the development. This position has been confirmed by the Council in previous submissions.

Sustainability Assessment

- 6.28 The extensions to the building will be designed to achieve a higher water efficiency standard and a 19% improvement on the dwelling emission rate as set out in b, and d, of policy H5 (Standards for new housing); as well meeting current Building Regulations standards. The development will retain the solar panels on the south facing roof face, which provide renewable, sustainable energy for the building, assisting in reducing Carbon Emissions.
- 6.29 The development is located within a sustainable location, as set out in paragraph 2.4, with secure cycle storage provided as part of this application.
- 6.30 The extensions are to an existing building, however all of the proposed and existing flats are dual aspect, will receive good levels of daylight and sunlight reducing reliance on electric lighting.
- 6.31 Materials used in the construction of development will assist in retaining local character and be sourced to ensure a low environmental impact. There will be no works that will affect ground or flood water.
- 6.32 Overall the development will be a vertical extension to an existing building in a sustainable location, incorporating renewable energy in the form of solar panels and will be designed to incorporate higher water efficiency and emission rates. The development would therefore meet the objectives of the CC2 and H5 of the RBLP and NPPF.

Affordable Housing and Contributions

- 6.33 In accordance with policy H3 (Affordable Housing) of the RBLP, valuations carried out by 2 estate agents will be provided and it is confirmed that the appropriate contributions will be agreed to.

Planning Balance

- 6.34 The site is located within a sustainable location, in close proximity to the town centre, making an efficient use of an existing building on previously developed land, contributing to meeting the need for additional housing in the Borough.
- 6.35 The proposals have addressed previous concerns raised by the Inspector in the appeal, significantly reducing the height of the building, vastly reducing the impacts on neighbouring residents.
- 6.36 The development is designed to complement the existing building and to ingrate with the surrounding character and has addressed previous concerns raised with regards to amenity. There are no material

considerations which indicate that planning permission should not be granted. Indeed, several benefits will arise from the grant of planning permission. Planning permission should therefore be granted for the proposed development.

7.0 Conclusion

- 7.1 In conclusion, the proposed development will deliver sustainable development in a sustainable location, making effective use of an existing building on previously developed land, making a contribution to the housing supply in Reading. The significant reduction in height of the building addresses previous concerns raised regarding impacts on amenity and the design of the building has been revised to better reflect the surrounding buildings.
- 7.2 For the reasons identified within this statement, it is considered that planning permission for the proposed development should be granted without delay.



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