

PLANNING STATEMENT

*Including Affordable Housing
Statement, Transport
Statement, Landscape
Principles and Air Quality
Statement*

**37 Hilcot Road, Reading RG30
2SX**

Prepared For
Westmore Enterprises Ltd

**10476
June 2022**



bell cornwell

CHARTERED TOWN PLANNERS

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CONTENTS

1	INTRODUCTION	1
	THE SITE AND ITS SURROUNDINGS	1
	PLANNING HISTORY	3
	THE PROPOSED DEVELOPMENT	4
2	PLANNING POLICY CONTEXT AND MATERIAL CONSIDERATIONS	7
	PLANNING POLICY CONTEXT	7
	PLANNING POLICY DESIGNATIONS	7
	MATERIAL CONSIDERATIONS	8
	KEY ISSUES FOR DETERMINATION	10
3	PLANNING BALANCE AND CONCLUSIONS	18



1 INTRODUCTION

- 1.1 Planning permission is sought for demolition of the existing building and erection of three new dwellings at 37 Hilcot Road, Reading RG30 2SX (“the Site”).
- 1.2 The applicant, Westmore Enterprises Ltd (“the Applicant”) has in the past used the premises for storage associated with their dispensing chemist business, before renting it out as a workshop space known as ‘the Silvers Workshop’.
- 1.3 The existing lawful use of the Site is workshop and ancillary store (such use having been established via CLEUD application granted in 1994). Such use would have fallen within Use Class B1(c) (light industrial) at the time and would now fall within the new Class E(g) Use Class.
- 1.4 Planning permission has previously been granted (but not implemented) for redevelopment of the Site for residential purposes.

THE SITE AND ITS SURROUNDINGS

- 1.5 The Site is located at the end of Hilcot Road, as shown in the Site Location Plan in Figure 1.

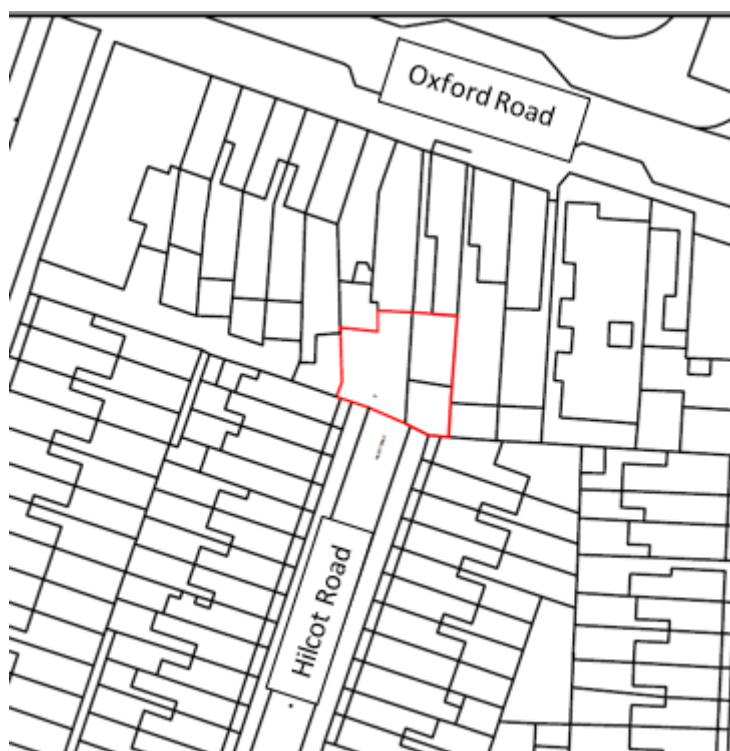


Figure 1 Site Location Plan



Figure 2 Views of the Site from Hilcot Road

- 1.6 At present, the Site accommodates a 1.5 storey building with access onto Hilcot Road. The building and its outdoor storage area occupy the majority of the Site, with the front elevation sitting at the front boundary as shown in Figure 2. To the rear of the Site there are commercial and residential properties which front onto Oxford Road (the rear of these properties is seen in Figure 3)



Figure 3 Views from the Site to the rear elevations of commercial/ residential properties fronting Oxford Road



- 1.7 On Hilcot Road there are terraced residential dwellings on both sides of the road, up to and adjacent to the Site. Hilcot Road and the surrounding area (with the exception of Oxford Road itself) is predominantly residential in character, typified by dense 2 storey terraced dwellings as shown in Figure 4.



Figure 4 View down Hilcot Road, showing the Site at the far end, and residential properties either side.

- 1.8 The Site location is highly accessible, with Hilcot Road connecting to Wilton Road and thereafter Kensington Road up to Oxford Road. The total walking distance from the Site, to the shops and facilities of Oxford Road, is 250m. Oxford Road is a main road with frequent public transport to Reading Town Centre.

PLANNING HISTORY

- 1.9 The existing lawful use of the Site is workshop and ancillary store (such use having been established via CLEUD application granted in 1994). Planning permission has since been granted for residential redevelopment, but this has not been implemented. The planning history is summarised as follows:

- **1994: Lawful Use of the Site as a Workshop with Ancillary Store**

CLEUD Reference 940126 – Granted 5 September 1994

- **2007-2008: Planning Permission to redevelop the Site with 3 x 1-bedroom dwellings**

Reference 071526 – Allowed on Appeal dated 2 December 2008. Not implemented.



- **2011-2012: Extension of time-limit for implementation**

Reference 11/01282/EXT – granted 14 March 2012. Not implemented.

- **2015-2016: Alternative scheme for 3 x 1-bedroom dwellings**

Reference 150238 – Refused for non-compliance with Policy DM6 (Affordable Housing). Appeal (App/E0345/W/16/3161384) dismissed.

- **2021: Alternative scheme for 4 x 1-bedroom dwellings**

Reference 210545 – Refused 28 July 2021 due to impact on street scene, quality of living accommodation, neighbour amenity (overlooking), parking, landscaping and affordable housing.

THE PROPOSED DEVELOPMENT

1.10 The Applicant has worked with his architect to redesign the Proposed Development in a way which addresses the reasons for refusal of the 2021 application.

1.11 It is now proposed to redevelop the Site, to provide 3 no. dwellings as follows:

Dwelling No.	Capacity	Size (m ²)
Flat 1	1b/2p	58
Flat 2	1b/2p	50
Flat 3	1b/2p	68

1.12 The dwellings will be set back from the Hilcot Road frontage, to enhance the character of the road. The units have been designed to meet the nationally described space standards. Concerns about overlooking to the rear have been addressed by orienting the properties to the south and reducing fenestration at the rear (whilst maintaining natural light levels internally). Space has been designed in for waste storage and bicycle parking (4 spaces).



Figure 5 Proposed Elevations

- 1.13 Figure 5 shows the proposed elevations, with the building's character being more reflective of the prevailing character in Hilcot Road as compared to the existing commercial building. Figure 6 below shows the proposed ground floor plan – this shows the building is set back from Hilcot Road to enhance the character of the road, and also accommodate landscaping planting, bin stores and cycle parking. The proposed building extends to the rear boundary and minimises windows at the rear to address previous concerns about overlooking of neighbours to the rear.

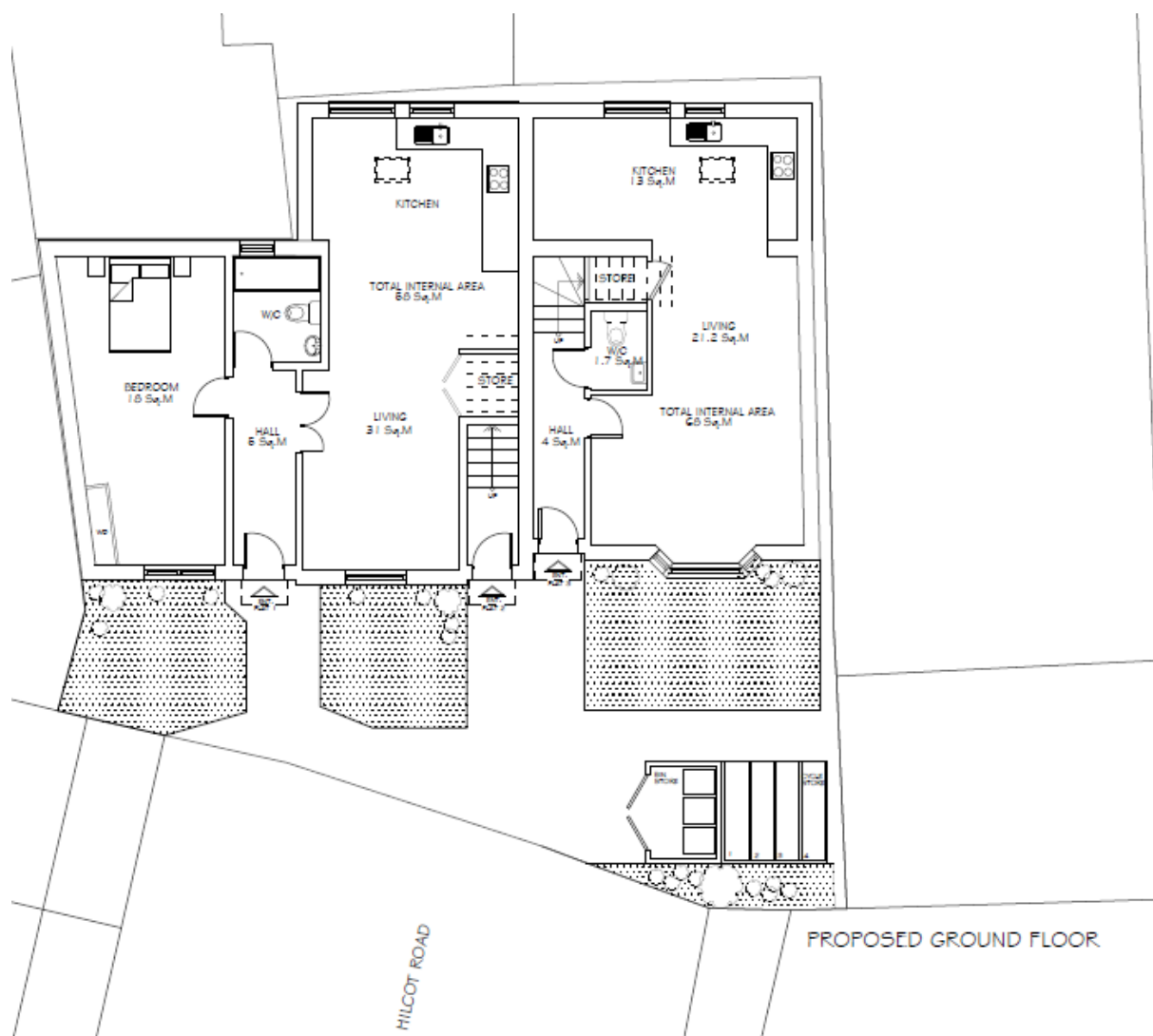


Figure 6 Proposed Ground Floor Plan showing the new building set back from Hilcot Road to accommodate bin stores/ cycle parking and amenity landscaping.



2 PLANNING POLICY CONTEXT AND MATERIAL CONSIDERATIONS

- 2.1 Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

PLANNING POLICY CONTEXT

- 2.2 The relevant Development Plan, against which the Application is to be assessed, is the Reading Borough Local Plan (Adopted November 2019). There is no Neighbourhood Plan which applies to the Site.
- 2.3 The following policies (assessed further below) are of particular relevance to the Application:

Local Plan 2019

- Policy CC1: Presumption in favour of Sustainable Development
- Policy CC8: Safeguarding Amenity
- Policy CC9: Securing Infrastructure
- Policy EN10: Access to Open Space
- Policy EN15: Air Quality
- Policy EM3: Loss of Employment Land
- Policy H3: Affordable Housing
- Policy H5: Standards for New Housing
- Policy H10: Private and Communal Outdoor Space
- Policy H14: Suburban Renewal and Regeneration
- Policy TR3: Access, Traffic and Highway Related Matters
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

PLANNING POLICY DESIGNATIONS

- 2.4 The Site (marked with a red star in Figure 7 below) is affected by the following planning policy designations:
- Oxford Road West Local Centre Boundary (Black line on Figure 7 below)



- Air Quality Management Area (Policy EN15) (Maroon line on Figure 7 below)

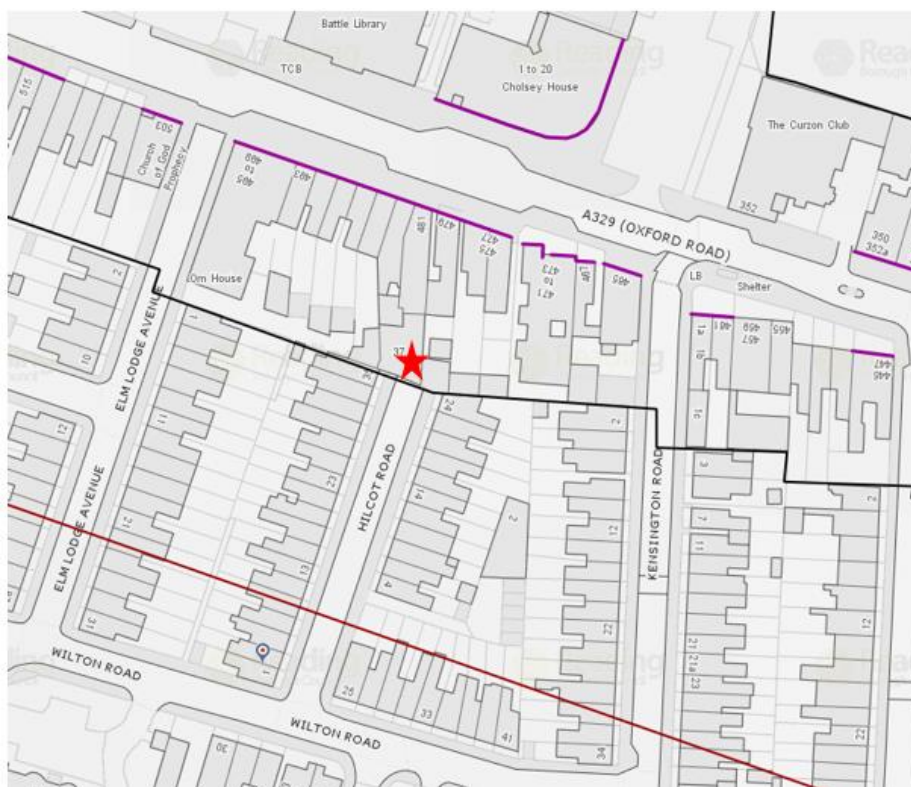


Figure 7 Extract of Local Plan Policies Map – Showing Applicable Designations

MATERIAL CONSIDERATIONS

National Planning Policy Framework

2.5 The National Planning Policy Framework (NPPF) (2021) is a material consideration. The sections of the NPPF which are of particular relevance include:

- Para 11: Presumption in favour of sustainable development;
- Paras 12 and 47: Decisions in accordance with development plan unless material considerations indicate otherwise;
- Para 64: Affordable Housing should not be sought for residential developments that are not major developments.
- Para 69: 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...LPAs should c) support the development of windfall sites through their...decisions – giving



great weight to the benefits of using suitable sites within existing settlements for homes;

- Para 110: In assessing applications for development, it should ensure that a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; ...c) the design of streets, parking areas...reflects current national guidance, and d) any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree.
- Para 111: Development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe
- Para 112: Applications should give priority first to pedestrian and cycle movements, and second – so far as possible – to facilitating access to high quality public transport.
- Para 119: Decisions should promote an effective use of land in meeting the need for homes ... while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- Para 120: Planning decisions should c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- Para 124: Support development that makes efficient use of land, taking into account a) the identified need for different type of housing and the availability of land suitable for accommodating it; ... d) the desirability of mainlining an area's prevailing character and setting, or promoting regeneration and change; e) the importance of securing well designed, attractive and healthy places.
- Para 130: Decisions should ensure developments a) will function well and add to the overall quality of the area, 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, d) establish or maintain a strong sense of place; e) optimise the potential of the site to accommodate and



sustain an appropriate amount and mix of development; and f) create places that area safe, inclusive and accessible.

Supplementary Planning Documents

2.6 The following Supplementary Planning Documents are also a material consideration of some weight:

- Revised Parking Standards and Design Supplementary Planning Document (2011)
- Affordable Housing Supplementary Planning Document (2021)
- Sustainable Design and Construction Supplementary Planning Document (2019)

KEY ISSUES FOR DETERMINATION

The Principle of Residential Re-Development

- 2.7 The Site is at the head of a cul-de-sac in a residential street in West Reading. In approving permission for residential redevelopment of the Site (Application Reference 071526, allowed on appeal), the Inspector took the view that the existing industrial unit on the Site is a “discordant use within this residential road.”
- 2.8 The principle of redevelopment of the Site has been considered two further times, since the granting of permission on appeal in 2008. In Application Reference 150238 an application for a 3 dwelling scheme was refused only on the grounds of lack of affordable housing contribution. In application reference 210545 a 4 dwelling scheme was refused on the grounds of impact on street scene, quality of living accommodation, neighbour amenity (overlooking), parking, landscaping and affordable housing. In other words, on both occasions, the principle of development (including the loss of employment) has been accepted by the Council, the most recent in the context of the current development plan.
- 2.9 The Applicant has reduced the density of proposed development, to address the concerns raised in respect of the previous 4 dwelling application. As the decision on the earlier 3-dwelling turned solely on the issue of affordable housing (Application Reference 150238) then it is reasonable to surmise that the key issues in this application will be matters related to design and affordable housing contribution – not the principle of providing 3 dwellings on this Site.



- 2.10 Furthermore, the Site is Previously Developed Land/ Brownfield (as defined in Annex 2 of the NPPF and the Local Plan Glossary). As identified in paragraph 2.5 above, the NPPF (Para 120) requires that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for delivery of new homes.
- 2.11 Policy H14 of the Local Plan (Suburban Renewal and Regeneration) provides that development will generally be supported where it involves regeneration or renewal of Reading's suburban residential areas which improves the local built environment and delivers additional homes. The policy is subject to some conditions which include there being no unacceptable impact on the highway network as a result of loss of parking (not relevant here, as the site has no parking); no loss of undeveloped land (not relevant here) and no loss of buildings and features that make a positive contribution to the area's character (it has been accepted on appeal that the current building is out of keeping with the character of the area). There must also be adequate community facilities to serve the community, which is secured via CIL/ infrastructure contributions.
- 2.12 The Proposed Development can be classified as a suburban renewal project, replacing a discordant and under-utilised light industrial unit with three dwellings which are more in keeping with the character of the area. National policy requires that substantial weight be given to the value of using suitable brownfield land within settlements for the delivery of new homes (para 120 NPPF). The principle of residential development on the Site has previously been accepted via the granting of permission for 3 dwellings in 2008 and by the subsequent refusals too. As such the principle of the Proposed Development should be acceptable, subject to compliance with the other issues discussed in this statement.

Loss of Employment Land Use

- 2.13 The principle of development (including the loss of employment) has been accepted by the Council, most recently in the context of the current Development Plan.
- 2.14 The Site is not located within the Core Employment Area. Policy EM3 (Loss of Employment Land) sets out the matters which will be considered in determining applications for re-development of employment sites for alternative uses, outside the Core Employment Area. This includes (as set out Policy EM3 (i) to (vi)) matters such as quality of access, viability of future employment uses, quantity of similar size and type of accommodation in Reading, effects on amenity and



character of a residential area, the need for alternative uses, and impact on potential for any larger comprehensive employment scheme.

- 2.15 As detailed in this Planning Statement, the Proposed Development will improve amenity and better reflect character of this residential road, as compared with the “discordant” industrial unit currently in situ. The Site is constrained in nature, and at the head of a residential cul-de-sac, so offers poor access and no prospect of a larger comprehensive employment scheme.
- 2.16 Paragraph 4.3.14 makes clear, however, that the requirements of Policy EM3(i) to (vi) are not to be treated as a checklist and merely inform a balanced decision:

“Elsewhere, a loss of employment land for other uses may be acceptable, depending on whether the land is still needed for employment purposes. Each application will need to be assessed on its merits, and the matters to be considered are set out in (i) to (vi) which should inform a balanced decision, not be used as checklist where every item is fulfilled. Proposals should demonstrate how these factors justify the release of employment land.”

- 2.17 It is clear that a balanced decision would consider loss of this employment site as being justified with this Proposed Development in this specific location. Loss of employment has not been a reason for refusal in respect of the previous application (detailed above). Most recently, in issuing a decision under the current development plan, the Council refused permission for the 4-dwelling scheme (in 2021). The reasons for refusal again failed to make any reference to any concerns regarding loss of employment. As such it must be assumed that having undertaken a balancing exercise as required by the policy and its supporting text, the release of employment land was justified.
- 2.18 Whilst the lawful use of the Site falls within Class E(g) (Workshop, with ancillary store), it is not currently being used for employment purposes. It is occupied by a registered charity, ‘The Silvers’ Workshop’, which is a member of the ‘UK Men’s Sheds Association’. The Silvers’ Workshop operates on a membership basis, allowing members to use the workshop space to work on projects and engage in practical and social activities together. Therefore, it is not expected that the re-development of the Site would not result in the loss of an actual employment use.



Character and Appearance

- 2.19 The Proposed Development will make a positive contribution to the street scene of Hilcot Road, as compared with the current building which is out of keeping with the residential character of the street.
- 2.20 In granting permission for redevelopment of the site for residential purposes in 2008 the Inspector considered the existing industrial unit to be a discordant use within this residential road and found that the appeal scheme would have a more appropriate residential and active frontage which incorporated features reminiscent of the Victorian terraces in Hilcot Road. He/she therefore found it compatible with the surrounding character and compliant with policy regarding character and appearance in force at the time.

Highways and Parking

- 2.21 In the Revised Parking Standards and Design Supplementary Planning Document (2011) the Site is classified as being within Zone 2 (Primary Core Area – Areas directly surrounding the core area, well served by public transport). This reflects the fact the Site is in a highly accessible location. It is 250m walk from the Site to Oxford Road (at its junction with Kensington Road) where there are many shops and facilities to meet daily needs (including a Tesco Supermarket) as well as a bus stop providing direct bus connection (with frequent services) to Reading Railway Station and the Town Centre.
- 2.22 The residential parking standard in Zone 2, for a one bedroom flat, is 1 space – giving a total of three spaces required on the Site. However, based on the high degree of accessibility of the Site, and its location within an Air Quality Management Area, it is not proposed to provide car parking for the use of the future occupants. Rather, a ‘permit free’ undertaking will be provided to ensure the Proposed Development does not contribute to parking pressure in Hilcot Road and the surrounding area.
- 2.23 The current use of the Site involves travel to premises by a number of members (approximately 8-10 were present when the site visit was undertaken) which is expected to generate a higher level of vehicle movements than the Proposed Development.
- 2.24 The existing use is within Class E. Relevant car parking standards for such a use in Zone 2 are based on gross floor area and would require 1 car parking space per 100-125m² of floorspace.



No car parking spaces are provided and as such, there is effectively an under-provision at the Site already, in terms of car parking provision.

- 2.25 In Appeal Reference APP/E0345/W/16/3161384 (which was the proposal for 3x 1-bedroom dwellings at the Site) the Inspector concluded that access and parking issues at the Site could be adequately addressed:

“I have had regard to neighbours’ objections over access and parking pressure in Hilcot Road, but consider appropriate measures to remove the right of future occupiers for parking permits and to secure a construction management statement, would overcome these concerns.”

Housing Mix and Affordable Housing Contribution

- 2.26 The Proposed Development will deliver 3 x one-bedroom flats which is considered the most suitable dwelling type for this Site.
- 2.27 As noted in the officer’s report for the 2012 extension of time application (11/01282/EXT), the Inspector who had approved permission in 2008 considered that one-bedroom dwellings are the most suitable housing type for the Site:

“The Inspector also found that the site was of insufficient depth to accommodate a private amenity area that would be appropriate for a family house, thus limiting the suitability of the site to smaller units.”

- 2.28 Policy H3 (Affordable Housing) sets out the requirement for affordable housing - on sites of 1 – 4 dwellings, a financial contribution is expected at a rate equivalent of 10% of the housing to be provided. Where proposals fall short of this target, the onus is on the applicant to demonstrate the circumstances justifying a lower affordable housing contribution. Paragraph 4.4.24 of the explanatory text recognises that the information required, in terms of viability, should be proportionate to the scale of development and for developments of less than 10 units the information will be more limited in scope and length. The Affordable Housing SPD (2021) provides further detail. Appendix 6 contains the ‘Checklist for Viability Assessment of Sites Less than 10 Dwellings’. Further information regarding viability will be provided in support of the application.



Internal Space Standards

- 2.29 Policy H5 (Standards for New Housing) sets out the standards for all new build housing. Outside the Central Area, housing must comply with the nationally-described space standards.
- 2.30 The Proposed Development has been designed to comply with these standards. The 3 one-bedroom dwellings are of 58m², 50m² and 68m² size (as compared with the previous scheme, which proposed 3 dwellings, each at 50m²).

Private Outdoor Space

- 2.31 Policy H10 requires that dwellings be provided with functional private or communal open space wherever possible, and that the design of outdoor areas must respect the size and character of other similar spaces in the vicinity. As shown on the plans, the building at present is flush up to the site frontage and it is proposed that the new dwellings be set back further into the Site in order to provide outdoor space for use by the occupants (and also to accommodate bin stores and cycle parking). The terraced dwellings on Hilcot have a small paved or grassed area in front of each dwelling, with space for bin stores etc so this is broadly in keeping.

Impacts on Amenity - Future Occupants and Neighbours

- 2.32 Policy CC8 (Safeguarding Amenity) requires that development does not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for the new residential properties. In particular, the policy provides guidance on back-to-back distances between dwellings, position of habitable rooms, windows and outdoor living spaces, privacy and overlooking, sunlight and daylight, overbearing and harm to outlook.
- 2.33 The previous scheme, for 4 x one-bedroom dwellings was refused, with the Council raising amenity concerns (particularly for the occupants of the future dwelling in terms of outlook of habitable room windows, ceiling heights and the overall scale of the built form in the constrained site.) Overlooking and privacy concerns were also realised regarding the position of dormer windows and the impact on no. 479, 482 and 483 Oxford Road.
- 2.34 In order to address these concerns the Applicant has redesigned the proposed Development, reducing the number of dwellings from 4 to 3, removing the fourth flat in the loft space to address concerns about ceiling heights. The amenity spaces to the rear of the building have been removed to minimise nuisance / disruption to properties at the rear. Figure 8 (not to scale)



provides a visual comparison of the rear elevation in the refused 4 dwelling scheme (compared to the Proposed Development) to show the amendments made to minimise amenity impacts to neighbours to the rear.



Figure 8 Comparison of rear elevation: (top) refused 4 dwelling scheme and (bottom) the Proposed Development.

Air Quality

- 2.35 The Site is located within an Air Quality Management Area (Figure 7 above). The application is not a major application, so does not trigger the need for an Air Quality Assessment by virtue of its location within the AQMA. Nevertheless, Policy EN15 aims to ensure that increased development does not lead to a net increase in emissions, as well as ensuring any increased exposure in the areas of poorest air quality is accompanied by appropriate mitigation. Paragraph 4.2.80 of the Local Plan details some examples of appropriate mitigation, such as setting residential units back from busy roads, restrictions on car access and parking and landscape planting.
- 2.36 The Site fronts on to Hilcot Road, a residential cul-de-sac with no through traffic, rather than the busy Oxford Road which is located to the rear of the Site. The rear elevation of the proposed dwellings is not exposed to Oxford Road, as there is a significant amount of existing built form



fronting Oxford Road. It is proposed to deliver car-free development which will assist with minimising emissions in the AQMA.



3 PLANNING BALANCE AND CONCLUSIONS

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Policy S1 of the Local Plan: Strategy and Sites (and Saved Policy G1 of the Local Plan 1003) provides that planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 3.2 The Proposed Development has been carefully considered in the context of all the relevant national and local planning policies. It can be classified as a suburban renewal project, replacing a discordant and under-utilised light industrial unit with three dwellings which are more in keeping with the character of the area. National policy requires that substantial weight be given to the value of using suitable brownfield land within settlements for the delivery of new homes (para 120 NPPF). The principle of residential development on the Site has previously been accepted via the granting of permission for 3 dwellings in 2008. As such the principle of the Proposed Development should be acceptable, subject to compliance with the other issues discussed in this statement.
- 3.3 Despite the Site's status in Use Class E(g), it is not expected that the re-development of the Site would not result in the loss of an actual employment use. Furthermore, the location is not considered suitable for any future employment use given the fact it is in a residential cul-de-sac with constrained access.
- 3.4 The Proposed Development will make a positive contribution to the street scene of Hilcot Road, as compared with the current building which is out of keeping with the residential character of the street.
- 3.5 Whilst the Car Parking standards are not complied with, the Site is in a highly accessible location. It is 250m walk from the Site to Oxford Road (at its junction with Kensington Road) where there are many shops and facilities to meet daily needs (including a Tesco Supermarket) as well as a bus stop providing direct bus connection (with frequent services) to Reading Railway Station and the Town Centre. Coupled with the fact the Site is located in an AQMA it is considered appropriate to deliver car-free development in this location. The Proposed Development would likely represent a reduction in trip generation, compared with the current use.



- 3.6 The dwellings have been designed to meet the Nationally Described Space Standards internally. Private outdoor amenity space is provided at the front of the dwellings. Amendments to the scheme design have been made to address previous concerns about quality of the accommodation for future occupants, and impacts on neighbour amenity.
- 3.7 The Applicant intends to submit viability evidence regarding the need for affordable housing contribution.
- 3.8 Subject to review of that evidence, and this being found acceptable, the Application should be approved.