



Planning Statement

Intensification of use of HMO to create Sui Generis House in Multiple Occupation.



32 Lorne Street, Reading, Berkshire, RG1 7YN

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1.0 Introduction

- 1.1 Arrow Planning have been instructed by Mr Amjad Mogal ('the Applicant') 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:

'Intensification of use of HMO to create Sui Generis House in Multiple Occupation..'

- 1.2 At 32 Lorne Street, Reading, RG1 7YN ('the Site').
- 1.3 This PS considers the proposed development against relevant Development Plan Policies and all other material considerations.
- 1.4 The application submission is accompanied by the following plans and documents:
- Application Forms
 - Covering Letter
 - CIL Forms
 - Planning Statement
 - Application Drawings:
 - Location Plan
 - Block Plan
 - Existing and Pre-Existing Ground Floor Plan - P-08-VA-066-01 Rev 06
 - Existing and Pre-Existing First Floor Plan - P-08-VA-066-02 Rev 06
 - Existing Loft Plan - P-08-VA-066-05 Rev 10
- 1.5 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 5.0 outlines the relevant planning policy framework for the determination of the application
 - Section 6.0 provides the development management
 - Section 7.0 draws a conclusion

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- 1.6 The proposals will provide policy compliant, well designed accommodation, making a positive contribution to Borough's housing supply and mix. In accordance with the NPPF, the application should be approved without delay.

2.0 Site and Surroundings

- 2.1 The Site relates to a 2 storey semi-detached dwellinghouse, with rooms in the roofspace, on the western side of Lorne Street, a residential street, in the built up area of Reading. To the front of the dwelling is a small paved area. A private garden is located to the rear. This is accessed via a side gate to the southern side of the dwelling.
- 2.2 The Site is located centrally within the Reading, located approximately 375m west of the designated central area. Reading town centre offers a full choice of day-to-day services, employment opportunities and shopping.
- 2.3 The Site is located within an Air Quality Management Area (AQMA), within flood Zone 1, in an area of low probability of surface water flooding. No Article 4 directions removing permitted development rights, including HMO conversions cover the application area.
- 2.4 The Site is not located within a conservation area, nor in close proximity to any heritage assets.

3.0 Relevant Planning History

- 3.1 The relevant site history is below:

Planning Reference: 220156

Proposed Development: Rear extension measuring 6m in depth, with a maximum height of 3.0m, and a flat roof. Notification of the construction of an extension under class A Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

Decision: Application Withdrawn (01/04/2022)

4.0 Application Proposals

- 4.1 The application proposes the conversion of the property at 32 Lorne Street to a 7 bedroom Sui Generis HMO. The loft has recently been extended under permitted development and the proposal does not seek consent for any external alterations or extensions.
- 4.2 The layout of the HMO will have 2 bedrooms on the ground floor with a communal Kitchen/Lounge to the rear which opens onto the garden/communal amenity area. At first floor are 3 bedrooms. A further 2 bedrooms are located in the roof space. All bedrooms have ensembles and room sizes are noted in the table below (Fig. 1). A central hallway/ circulation space will run through the building providing access to all of the rooms.

Room	Room Size
Bedroom 1	13m2 (Plus Ensuite)
Bedroom 2	10m2 (Plus Ensuite)
Bedroom 3	17m2 (Plus Ensuite)
Bedroom 4	10m2 (Plus Ensuite)
Bedroom 5	19m2 (Plus Ensuite)
Bedroom 6	14m2 (Plus Ensuite)
Bedroom 7	13m2 (Plus Ensuite)
Kitchen/Lounge	24m2

Figure 1 – Room sizes

- 4.3 No on street parking is proposed as part of the development. There is adequate space at the Site for refuse 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)
- 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 H8: Residential Conversions states that proposals to convert buildings into self-contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing.

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- 5.10 Policy H10: Private and Communal Outdoor states dwellings will be provided with functional private or communal open space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.
 - 5.11 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.
 - 5.12 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)

- 5.13 In addition to the local policies referred to above, the following national policies are of particular relevance to this submission.
- 5.14 NPPF Paragraph 8 seeks notes the 3 overarching objectives of the planning system to achieve sustainable development: economic, Social and Environmental. It notes 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'*.
- 5.15 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.
- 5.16 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'*.
- 5.17 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.
- 5.18 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.'
- 5.19 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)

- Revised Parking Standards and Design (2011)
- Residential Conversions (2013)
- Affordable Housing SPD (2021)
- Revised SPD on Planning Obligations under Section 106 (2019)
- Sustainable Design and Construction SPD (2019)

6.0 Development Management Assessment

Principle of Development

- 6.1 The property is a 2 storey dwelling with rooms in the roofspace. The proposal seeks to materially intensify the use by making it a 7 person (Sui generis) HMO. The provision of HMO accommodation is assessed under Policy H8 (Residential Conversions) and the Residential Conversions SPD, which sets out the requirements that HMOs should meet.
- 6.2 Policy H8 requires the property to have a gross floor area in excess of 120m² when measured externally; this is easily met by 32 Lorne Street which measures in excess of this requirement. The policy also requires HMOs to provide sufficient communal space. The conversion provides a communal lounge and kitchen area measuring 24m², which opens out onto the garden space. This would provide a large communal space for the residents to enjoy, whilst also providing direct access to the garden area for amenity use.
- 6.3 The Residential Conversions SPD (RC SPD) identifies a ‘tipping point’ as to the number of HMOs in a local area, where the number of conversions in the area would be communally detrimental to the local community through the loss of family housing. The SPD states that permission will not normally be granted where the number of HMOs in a 50m radius would exceed 25% of the residential properties within that radius. It is noted that the property’s use is established as small house in multiple occupation, C4 use, and therefore there will be no loss of family accommodation as part of the development.
- 6.4 Notwithstanding the above, a review of the residential properties within a 50m radius has been conducted, using the Council’s HMO register, with the radius map at Appendix 1. The total number of HMO properties within the 50m radius, was calculated as 6 out of the 43 properties within the search area. This sets the percentage of properties within the radius which are HMOs as being approximately 14%, which demonstrates that the number of HMOs in the area is well below the 25% tipping point. It is also noted that the Site lies outside of RBC’s HMO Article 4 Direction.
- 6.5 The principle of the intensification of the application property to a Sui Generis HMO, as supported above is therefore considered acceptable.

Amenity of proposed and existing residents of nearby properties

- 6.6 The Residential Conversions SPD sets out a number of checklist items which provide further detail related to adopted Policies CC8, H8 and H10 of the Reading Borough Local Plan 2019.
- 6.7 Policy CC8 (Safeguarding Amenity) requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety.
- 6.8 Policy H8 (Residential Conversions) requires that there are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties.
- 6.9 Policy H10 (Private and Communal Outdoor Space) deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage and drying space.

Room Sizes

- 6.10 The room sizes are noted in figure 1 in section 4 above. All of the bedrooms would be 1 person rooms and would therefore comfortably meet the space standards as set out in the RC SPD which sets out that 6.5m² is required if the bedroom is to be occupied by 1 person and 10.5m² if to be occupied by 2 persons where the kitchen is communal. All the bedrooms have ensembles and will be served by a separate Communal Kitchen/Lounge which is 24m² and opens onto the garden. The proposed bedrooms therefore are well above the standards set out in the Council's guidance and provide a good quality living environment for future residents.

Communal Space

- 6.11 The RC SPD identifies that the amount of communal space that is considered appropriate in a large HMO would be dependent on the number and size of bedrooms. The RC SPD advises one communal room for every 4-6 bedrooms, depending on the size of the bedroom. Whilst the proposal only provides one communal space, and contains 7 bedrooms, it should be noted that the bedroom sizes far exceed the requirements and all having ensembles. Being located on the ground floor, none of the occupiers of the building will be more than 2 floors distant for the shared area as per the SPD guidance.
- 6.12 The communal area provided is also sizable, being 24m² and is located backing onto the garden allowing access to the amenity area. The space also has a good level of light and outlook, facing onto the rear garden. A good standard of communal space is therefore provided to the occupants.

Amenity Space

- 6.13 The rear garden space is sizable measuring approximately 135m² and is grassed for amenity use. The garden space is accessed via the side of the property through a gate or through the communal area to the rear. A smaller area of paved space is also located to the front of the property.
- 6.14 As well as the sizable rear amenity space, Victoria Park is a 7 minute walk to the North of the Site, which provides a large area of public amenity space. To the west is also Kensington Park, which also provides public amenity space.
- 6.15 Given the size and nature of the communal garden area and its accessibility through the communal area and from the side of the dwelling it provides a good standards of amenity space for future residents in accordance with Policy H8 and H10 of the RBLP.

External windows

- 6.16 All habitable rooms would benefit from external windows, receiving adequate levels of light, ventilation and outlook. The bedrooms in the roof space are served by vertical windows for bedroom 7 to the rear, with skylights serving room 6.
- 6.17 Outlook from the side windows on the ground and first floors echo the previous layout at the property shown on the pre-existing plans, where bedrooms 2 and 5 looked out onto the side passageway. The outlook of bedrooms 2 and 4 will therefore be the same as the previous layout, however the living accommodation is superior, with larger rooms and a better internal layout.
- 6.18 All of the rooms would therefore receive good levels of outlook and access to light.

Layout/Stacking of Rooms

- 6.19 In line with the RC SPD the bedrooms are stacked appropriately with no communal areas located above bedrooms, with bedrooms being located above bedrooms on the upper floors. A central circulation space serves all of the rooms in the property. The communal area is located backing onto the rear garden, which allows for ease of access to the garden.
- 6.20 The overall layout again is an improvement on the pre existing arrangement. It makes better use of space, with the communal space backing onto the garden, larger bedroom sizes and ensuites in all rooms.

Privacy/ Outlook/ Loss of light

- 6.21 The development would not result in any additional overlooking or overbearing, with no external alterations proposed as part of the development.

Noise and Disturbance

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- 6.22 As noted above, the property is stacked appropriately which will overcome issues relating to Noise transfer through property, with the communal area located at the back of the property on the ground floor.
- 6.23 The number of residents at the property is to be 7 persons and therefore this is unlikely to generate a noticeable increase in noise from the existing use on the surrounding area.

Conclusion on Amenity

- 6.24 The proposals would provide a good standard of living accommodation for future occupants, with large bedrooms all served by en-suites, a large communal area and large amenity space to the rear. All rooms are served by external windows, providing a good level of light and outlook with the stacking of the property limiting inappropriate noise transfer through the building. There would be no detrimental impacts on neighbouring amenity arising from the proposals.

Design and Impact on the streetscene

- 6.25 As part of the proposals (which relate use only) there will be no impacts to the external appearance of the dwelling and therefore there will be no impacts to the host dwelling or streetscene.

Highways and Parking

- 6.26 The Site is located within Zone 2 of the RBC Zonal scheme set out in the Revised Parking Standards and Design SPD (2011). This sets Zone 2 as being the 'Primary Core Area' directly surrounding Reading 'Central Core Area', which contains the main shopping and transport hubs. The Site is located approximately 650m from the Central Core, being a 17 minute walk from the Oracle Shopping Centre at the heart of Reading.
- 6.27 The Site is located approximately 200m as the crow flies from Reading West Station (which has direct links to London), being less than a 5 minute walk. A bus stop is located at the top of Lorne Street (George Street Stop) providing a regular service to the town centre and surrounding area. There are further bus stops to the south on Tilehurst Road.
- 6.28 To the north of the Site, Oxford Road is a 2-minute walk, which provides shops (including Tesco Express), restaurants and other amenities.
- 6.29 In accordance with the SPD, the proposals would be required to provide 0.25 car parking spaces per room, requiring a total of 1.75 spaces. As set out above however, given the highly sustainable location, no off street parking has been provided as part of the proposals. The Site is also located within parking permit zone and therefore any on street parking for residents of the building would be restricted and managed. Furthermore, it is noted that, in

comparison, a C3 dwelling house with 4+ bedrooms would require 2 spaces as set out in the Parking SPD. Use of the property as a C3 4+ bedroom dwelling would therefore attract a higher parking requirement than the HMO.

- 6.30 In accordance with the RC SPD cycle storage should be provided at a ratio of 0.5 secure cycle storage spaces for each letting room, requiring 4 (3.5) spaces be provided. There is ample space within the Site to provide these spaces and a condition could be attached to any consent requiring details of these to be submitted and approved by the LPA.
- 6.31 As set out above the scheme would be acceptable in transport terms, in accordance with the requirements of policies TR2-TR5 and the NPPF.

Sustainability Assessment

- 6.32 Policy CC2 (Sustainable Design and Construction) and policy CC3 (Adaption to Climate Change) seek to ensure development is designed to incorporate measures to reduce energy consumption and assist in tackling climate change.
- 6.33 The proposal relates to use only and does not include any operational development. All external alterations have been undertaken under permitted development entitlement or comprise internal alterations that fall outside of the scope of development as defined in S.55 of the TCPA. Notwithstanding this, it can be confirmed that refurbishment works incorporate a higher standard of insulation and the windows and doors have been replaced to reduce energy consumption. A new central heating system is to be installed, further increasing the energy efficiency of the property. Further energy saving measures are proposed including energy efficient lighting and fixtures/fittings.
- 6.34 As well as the energy efficiencies noted above, the development is located within a sustainable location as set out in the highways section above. The materials for the construction are to be sourced locally. There will be no works that will affect ground or flood water.
- 6.35 Overall, the development will increase the energy efficiency of the property, with the Site being within a sustainable location. The development would therefore meet the objectives of the CC2 and H5 of the RBLP and NPPF.

Other matters

Trees and Ecology

- 6.36 The development is for the change of use of the building 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

- 6.37 The development is located within flood zone 1 with no external alterations to the building. The proposals would have no impact on drainage at the Site.

Refuse

- 6.38 There is adequate space around the site for refuse storage with access to the rear of the property via the side gate. Refuse storage is proposed to continue in its current form, with bins being stored adjacent to the boundary wall (as is common in the street) and taken to the kerb side on collection day.

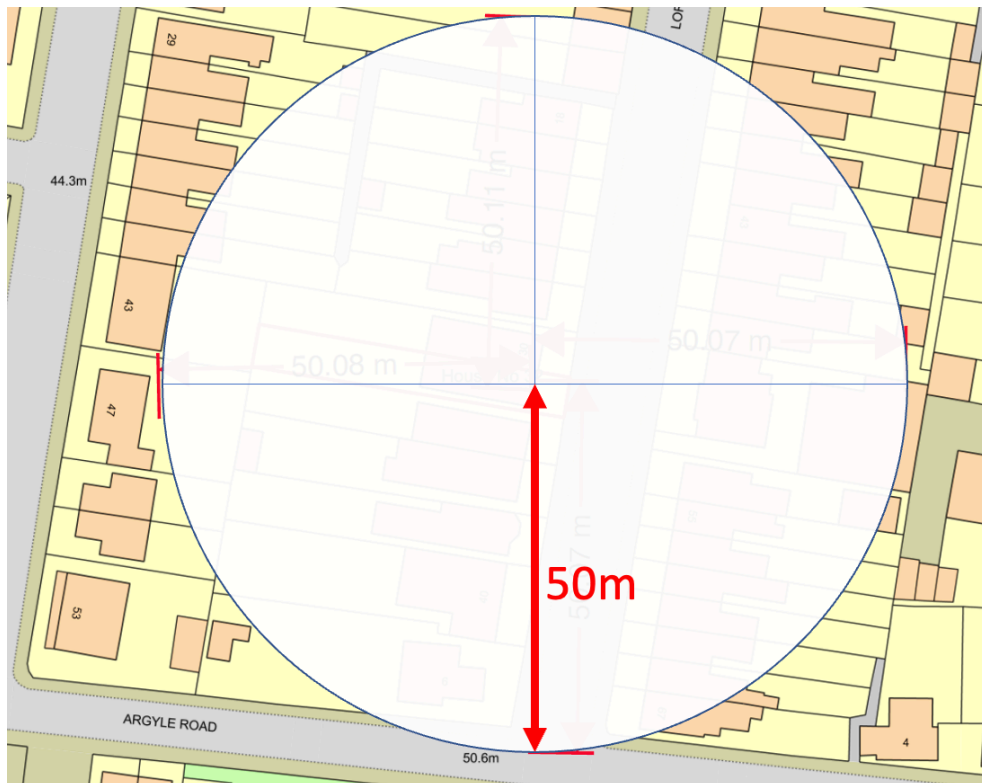
Planning Balance

- 6.39 The site is located within a sustainable location, in close proximity to the town centre, with excellent links to public transport. It has been demonstrated that the conversion would not result in an overconcentration of HMOs.
- 6.40 The quality of accommodation would provide a good standard for future residents, being an improvement on the previous layout, and would not have a negative impact on the amenity or character of the surrounding area. The development would make efficient use of an existing building, on previously developed land, contributing to the varied housing needs of the Borough.
- 6.41 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 development will deliver sustainable development in a sustainable location, making effective use of an existing property on previously developed land. It will also make a contribution to housing supply within Reading.
- 7.2 The proposals would provide a good standard of accommodation for future residents, being an improvement on the previous layout, and would not have a negative impact on the amenity or character of the surrounding area.
- 7.3 For the reasons identified within this statement, it is considered that planning permission for the development should be granted without delay.

Appendix 1: 50m Radius from site





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