

DELEGATED APPLICATION REPORT

Application No: 210708/FUL

Address: 'Water Tower Store', Land to rear of 54-54A Norcot Road, Tilehurst, Reading

Proposal: Conversion of existing Water Tower Store to a dwelling house (Class C3) and insertion of new doors, windows and rooflights. Associated soft landscaping and erection of brick wall and gate.

Case officer: Ethne Humphreys

Decision date: Originally 30/07/2021; EOT agreed until 07/01/2022

Site Description and Surrounding Area:

The application site proposals relate to a detached garage store structure/outbuilding located to the south east of the 'Water Tower' and to the south of Norcot Road. The "Water Tower" is a Grade II Listed Building.

The listing for the Water Tower is as follows:

"TILEHURST NORCOT ROAD SU 67 SE (south side, off) 16/650 Water Tower II Water tower, now storage. Late C19. Red brick in English bond. Circular plan. 3 stages, each with semi-circular header blind arcading, punctuated alternately with sash windows with glazing bars and semi-circular heads set in orange brick surrounds. Each stage has a moulded brick string course. The top stage has circular windows with glazing bars in groups of 3 with small opening lights in centre. Planked entrance door with semi-circular head and flat canopy on north. Loading bay with derrick on west in first stage."

The site is within an area of potential contaminated land.

Proposal:

This application seeks planning permission for the conversion of the detached garage store structure/outbuilding detached garage to a one-bed flat.

No extensions are proposed; however, it is proposed to replace the garage door with a front door and window and insert three windows on the west elevation(s). Three rooflights are also proposed, two on the western roof slope and one on the eastern roof slope.

A new wall and gate are proposed to the front of the property and soft landscaping has been indicatively shown as well as a decking area. A new cycle store is proposed behind the tower

for users of the tower, as well a cycle store to the front of the property. One vehicle parking space is proposed.

Plans Considered:

Drawing No: Site Location Plan as Existing 02-00 P1

Drawing No: Site Plan as Existing with Trees 02-05 P1

Drawing No: Existing Block Plan 02-01 P1

Drawing No: Plans and Elevations as Existing 03-00 P1

Received 5th May 2021

Drawing No: Site Plan as Proposed 02-10 P2

Drawing No: Plans and Elevations Proposed 03-10 P2

Received 28th July 2021

Other documents:

Heritage Statement rev.02

Planning and Design Note

Received 28th July 2021

Relevant Planning History:

191724/FUL Conversion of existing Water Tower Store to a dwelling house with new doors replacing existing and associated uses. Withdrawn.

080751/FUL Part demolition and conversion of existing store into 1 bed caretaker flat. Refused.

991569/FUL Refurbishment and Conversion of the Water Tower into 6 x 2 Bedroom Flats and Erection of 2 x 2 Bedroom Maisonettes. Permitted.

Internal/External Consultation Responses:

Highways Officer: Further to additional information received, no objection, discussed below.

Tree Officer: No objection, discussed below.

Conservation and Urban Design Officer: Objection, discussed below.

Neighbour letters were sent to the occupiers of nearby properties.

No neighbour letters of representation received.

Summary of discussions with applicant/agent:

The applicant was advised of concerns in respect of the impact on the setting of the listed water tower building and the quality of accommodation for future occupiers. The applicant did not wish to withdraw the application and hence issuing this decision notice.

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

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority 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 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) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (2021)

National Planning Policy Guidance (2014 onwards)

Reading Borough Local Plan 2019

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction
CC3: Adaptation 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
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
EN17: Noise Generating Equipment
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
H11: Development of Private Residential Gardens
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 Parking Standards and Design SPD (2011)

Revised SPD on Planning Obligations under Section 106 (2019)

Sustainable Design and Construction SPD (2019)

Tree Strategy (2021)

Other relevant documentation / guidance / legislation

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)

Guide to the Conservation of Historic Buildings (British Standards Publication BS 7913:2013, 2015)

DCLG Technical housing standards - nationally described space standards (2015)

National Design Guide: Planning practice for beautiful, enduring and successful places (2019)

Tree Strategy (2021)

Appraisal

Principle of Development

The existing storage building is not located within a designated Core Employment Area and there is no objection to the loss of a building in such a use. The site is located within a predominantly residential area and it is considered that the principle of residential use could broadly comply with the principles of Policy H1 (Provision of Housing) by contributing to the housing needs within the borough. However, the proposed change of use to residential is subject to the following material planning considerations.

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. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments. 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”.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

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. Further to this, Policy EN6 (New Development in a 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 130 of the NPPF 2021 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 199 of the NPPF 2021 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.

The recently published 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'.

It is proposed to enclose the front of the site with a 2.1m high brick boundary wall. No elevation drawings have been provided in this respect; however, the position of the wall is shown on the proposed site plan. It is recognised that this boundary treatment is proposed in an attempt to provide a private garden space for future occupiers. However, it would close off the 'separateness' between the listed water tower and built form to the east.

Furthermore, the plans indicate that the associated brick wall pillars would directly abut the listed building, with no separate listed building consent applied for. It is considered that the level of intervention required to provide a domestic property with enclosed garden area would result in harm to the setting of the listed building. It is apparent that the proposals are not capable of providing a typical layout characteristic of the surrounding suburban housing due to the limited space available and constraints of the site, neither does the proposal achieve a carefully designed layout which respects the particular characteristics of the site in the context of the historic water tower.

Although the proposal retains the existing store building, its merits are largely limited to that basic fact. It is considered that the uncharacteristic relationship of the proposed arrangement with existing listed water tower, and the spaces that surround it would fail to respect the special character of the building and its setting. The proposed enclosed frontage and associated domestic paraphernalia would harmfully erode the separateness of the adjacent listed building and introduce visually distracting elements into the setting.

Given the harm identified, in these circumstances paragraph 193 of the NPPF states that harm should be weighed against the public benefits of the proposal. The very limited public benefits in this case lie in the provision of a one bed residential unit. Given the additional concerns raised below in respect of quality of accommodation for future occupiers, it is considered that this benefit would be limited and not considered to outweigh the harm the proposals would cause to the setting of the listed building.

The proposal represents an overly intensive use of the site and due to the harm to the character and pattern of development of the surrounding area and particularly the harm to the listed building that would arise, the proposal would not preserve or enhance the local character and would be contrary to Policies, CC7, EN1, EN6 and H10 of the Reading Borough Local Plan 2019 and guidance within the NPPF 2019.

Impact on Neighbour Amenity

Residential amenity is assessed against 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.

No extensions are proposed, and the proposals are not considered to result in any material loss of light or overbearing effects. Whilst a brick pillar is proposed close to a ground floor window of the water tower flats, its position and form is not considered to be so overbearing in itself to warrant a refusal.

The proposed plans for the water tower flats (991569) show that the two ground floor windows on the south east side of the water tower closest to the garage structure in question serve a bedroom. Potential future occupiers would need to walk directly past both windows to enter

the proposed residential unit with no defensible space for neighbouring occupiers. Given the potential for activity immediately in front of both windows (and noting the garden for the proposed unit is directly in front of one of the bedroom windows) this would result in a loss of privacy, noise and disturbance that would be a significant material worsening over and above the current situation. This is considered to result in an unneighbourly form of development that would be contrary to Policy CC8.

Amenity of Future Occupiers

Policy H8 (Residential Conversions) covers the suitability of a property's conversion to residential use. 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 proposed living accommodation is considered to be poor. The proposed unit is small and would only be suitable for a single occupant. Given the proximity of the water tower directly to the west, combined with the two storey built form to the east and the significant tree to the south, this is considered to result in an overbearing and oppressive environment for future occupiers.

It is not clear whether sufficient light to the unit would be achieved through the proposed windows and/or rooflights given the proximity and scale of the adjacent built form and significant tree to the south (and noting that no day/sun light report has been submitted with the application in respect of future occupiers). Given this and the above, there would be an unacceptable sense of enclosure and confinement for future occupants.

Whilst some private amenity space has been annotated on the proposed site plan, the space would be limited and not characteristic of those in surrounding plots (which are far more generous in size). Indeed, the amenity space would be heavily constrained and compromised by the immediate built form either side and the proximity of vehicles accessing Sona Gardens from the road directly abutting the site to the north. Furthermore, there would be both a perception of and actual overlooking of the amenity area given the position and proximity of the two ground floor bedroom windows of the water tower. This would significantly undermine any privacy when in use.

There would be no other area of external amenity space available and given the above, the proposals would not allow for any good quality area of amenity space, or any attractive or enjoyable amenity area for relaxing.

The numerous shortcomings identified, both individually and cumulatively, result in an overall conclusion that the proposal would offer a poor quality of accommodation for future occupiers, harmful to their amenity and that this would be contrary to Policies H8 and H10 of the Reading Borough Local Plan 2019.

Transport Issues

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.

Vehicular access to the site is currently gained from Norcot Road which is classified as the C401. Norcot Road forms part of the Red Route 'no stopping' corridor which has been implemented along the bus route number 17 corridor.

Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. It is important that enough parking is provided so that there is not a knock-on effect on the safety and function of the highway through on-street parking.

The site is located in Zone 3, Secondary Core Area and the required parking provision for the proposal is 1 space per dwelling. The Design & Access Statement states that the proposal offers 1 allocated parking space by utilising space along the entrance road. Concern was originally raised by the Council's Transport Officer however, that the proposed parking space is a space associated with the water tower conversion (see planning history above). It was initially considered that a reduction in parking provision associated with the existing flat was unacceptable and that based on the information submitted, the application had failed to demonstrate its acceptability in terms of Policy TR5.

Further to the above, discussions were held between the applicant and the Council's Transport Officer with regard the provision of a parking space for the proposal as well as maintaining

sufficient space for all users of the water tower. Further to which, the Council's Transport Officer has noted that whilst the approved site plan under application 991560 provided 12 parking spaces along the access road, there are actually 13 spaces available. Given this and based on the updated site plan (drwg no. 02-10 Rev P2) it is not considered that the original transport objection could reasonably be upheld and the Transport Officer has confirmed that there is no transport objection.

Should the application have otherwise been considered acceptable, conditions would have been attached in respect of vehicle parking (as specified) and cycle parking details to be approved.

Policies TR1, TR3 and TR5.

Natural Environment

Policy EN14 (Trees, Hedges and Woodlands) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks proposal should include appropriate landscaping.

The proposed plans indicate a tree to the rear of the site despite the application form which states that there are no trees on the site and no trees that would influence the development. Aerial photography, site photos and a site visit confirm that this is clearly not the case, with a substantial tree located immediately adjacent to the garage structure. The plans indicate that the tree is to be retained which in itself is positive. No tree survey or Arboricultural information has been provided but the Council's Natural Environment Officer confirms that given the nature of the proposals, which do not include any increase in the footprint of the structure, that there would be no direct potential to harm the tree. Should the application have otherwise been considered acceptable, conditions would have been recommended to secure tree protection to ensure that the root protection area would not be harmed during works on the site. Similarly, given the indicative landscaping shown then as above should the application have otherwise been considered acceptable a condition would have been attached to secure hard and soft landscaping details.

Policies EN14 and CC7.

Sustainability

Policy CC2 (Sustainable Design and Construction) requires that all minor conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a

minimum. Whilst no specific reference to BREEAM standards has been submitted, should the application have otherwise been considered acceptable and recommended for approval, then this could have been dealt with by way of a suitably worded condition.

Policy CC2.

Affordable Housing

The proposal seeks to create one additional unit through conversion and 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 that valuations would be provided. However, these have not been forthcoming and as 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 provision. By consequence, this forms a further reason for refusal of the application.

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 a s106 or unilateral undertaking.

Policy H3.

CIL

The proposal would be a Community Infrastructure Levy (CIL) liable development. The applicant has provided the CIL Additional Information Form. If the scheme had been acceptable an informative would have been attached to the decision notice to advise the applicant of their responsibilities in this respect.

Overall Planning Balance and Conclusion

In weighing up the planning benefits of the proposals (introducing one additional unit to the housing stock in the borough,) versus the dis-benefits of the scheme (as detailed at length in the officer assessment above), it is considered that the critical planning balance weighs against

the proposals. Having regard to the material considerations and all matters raised, it is considered that the balance of considerations therefore weighs firmly against the proposal, and that planning permission should be refused.

RECOMMENDATION:

REFUSE

1. The proposed development, due to the plot size and close proximity to existing properties would result in a cramped form of residential development. This would not respect the prevailing pattern of development or character of the area and this, combined with the proposed enclosed frontage and associated domestic paraphernalia would harmfully erode the separateness of the adjacent Listed Water Tower from surrounding properties. This would be detrimental to the setting and significance of the Listed Building. As such the proposals would be contrary to Policies CC7, EN1, EN6 and H10 of the Reading Borough Local Plan 2019 and the National Planning Policy Framework 2021.

2. The proposed garden area, due its small size, cramped relationship with adjacent buildings, and overlooking from existing neighbouring windows, would offer insufficient privacy and a poor quality of outdoor amenity space. This would adversely impact upon the amenity and quality of living accommodation for future occupants, contrary to Policies CC8 and H8 of the Reading Borough Local Plan 2019.

3. The layout of the proposed development, and its outdoor areas in particular, would result in an intensification of noise, disturbance and loss of privacy to occupants of the adjacent Water Tower due to its close proximity to neighbouring habitable room windows, contrary to Policy CC8 of the Reading Borough Local Plan 2019.

4. In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough, contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Affordable Housing Supplementary Planning Document 2021.