

ATLAS

PLANNING GROUP

PLANNING STATEMENT

Mulberry House, 1A Eldon Road, Reading, RG1 4DJ

APRIL 2021

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Atlas Planning Group in support of a full planning application that seeks to erect a 3-5 storey building to provide 9 apartments at 1A Eldon Road, Reading.
- 1.2 The site benefits from an extant scheme approved in March 2019 (App Ref:180591) that granted permission for a 3-5 storey building, providing 7 apartments.
- 1.3 There is also a more recent, application (200123) which was refused and dismissed at appeal (APP/E0345/W/20/3259438).
- 1.4 The proposed development represents an improvement to the two previous schemes and is considered to be acceptable as demonstrated by this Statement and the other supporting information that accompanies the application.

2. SITE DESCRIPTION

- 2.1 The site, which extends to 0.1ha has been cleared of built development following the demolition of the dental surgery (Mulberry House) which was granted through planning applications 171521 and 180591.
- 2.2 The site is situated within the Eldon Square Conservation Area and is bounded to the north by an eight-storey block of flats (Hanover House), which were formerly offices. Bordering the site to the east is a high tree line beyond which is a row of houses at Town Place.
- 2.3 Directly to the south there is a pair of 19th century semi-detached houses (1/3 Eldon Road). To the west, although separated by both Eldon Road and a large area of green space, there is a row of Grade II Listed buildings.
- 2.4 Access is currently via Eldon Terrace, this access will remain, however the application red line has been changed to also include an alternative access from Eldon Road through the Hanover House access.
- 2.5 The site (save for that part which forms the access way from Eldon Road to the site over which unfettered rights of way on foot and with vehicles are enjoyed and which is within the Reading Central Area boundary) it outside such boundary but is within a 10 minute walk of both Reading Station and the Town Centre.

3. PLANNING HISTORY

PRE-APPLICATION 170968/PREAPP

3.1 In June 2017, an application seeking pre-application advice was submitted to Reading Borough Council for the demolition of the dental surgery and the erection of a 6-storey building, accommodating 8x1 bed and 3x2 bed flats and parking for 3 cars.

3.2 Officers concluded that, *“although there were many challenges in bringing forward a suitable proposal at the site, these were not insurmountable”*.

FULL PLANNING APPLICATION 171521

3.3 In December 2017, an application for the demolition of Mulberry House and soft landscaping was approved by Reading Borough Council.

FULL PLANNING APPLICATION 180591

3.4 In March 2019, an application for the demolition of the dental surgery and the erection of a part 3, part 5 storey building providing 7 residential units, 5 parking spaces, landscaping and associated works was approved by Reading Borough Council.

3.5 The approval has been implemented through the demolition of the dental surgery, the permission therefore remains extant and could be implemented at any time.

FULL PLANNING APPLICATION 200123

3.6 In June 2020 an application was refused that sought the erection of a 3-5 storey building providing 11 apartments and a semi-open basement providing 10 parking spaces.

3.7 The application was subsequently dismissed by the Planning Inspectorate (APP/E0345/W/20/3259438).

4. THE PROPOSAL

4.1 The description of development is as follows:

“Erection of a 3 to 5 storey building providing 9 (5x1bed, 4x2bed) residential units (Use Class C3), 5 undercroft parking spaces, landscaping and associated works”.



Figure 1: Proposed CGI

4.2 The proposed GIA amounts to 804.8m². The overall extent of the massing has been significantly reduced when compared to the recently refused scheme, the changes are detailed within the Design and Access Statement and can be summarised as follows:

- The north elevation chamfers significantly away from Hanover House, reducing the massing in this area when compared to the recently refused scheme.
- It is visible from the eastern elevation that the top two floors have been significantly reduced in scale. Additionally, the use of a different material to the two blocks further breaks down the perceived massing of the eastern elevation.

- When considering the southern elevation, the lower three floors have been decreased in width in comparison to the refused scheme. The full height element has been pushed further towards the north and provides a sensitive transition in scale to Hanover House.
- With regard to the western elevation, the reduction in massing of the top two floors is evident. The western elevation is pulled back from the line of the refused scheme and redesigned as a single plane with inset balconies. This removes the need for the privacy screen previously proposed. The spacing between Hanover House and the proposed scheme is also visibly improved.

4.3 Access to the site is proposed to be via both Eldon Terrace and Eldon Road, utilising the existing controlled entrance to Hanover House, to the north (which the applicant has a right of way over).

5. PLANNING CONSIDERATIONS

5.1 Reading Borough Council adopted their new Local Plan in November 2019. The new Plan has replaced the Core Strategy (2015), Reading Central Area Action Plan (2009) and the Sites and Detailed Policies Document (2015).

5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Local Plan (2019) is the Council's primary Development Plan Document and is therefore the starting point for determining planning decisions.

5.3 The National Planning Policy Framework (NPPF) (2019) provides a national tier of policy and decision-making guidance for the planning system and forms a material consideration for planning decisions.

5.4 The policy and guidance contained within the statutory Development Plan Documents and all other relevant material considerations have been reviewed to ensure the proposal is an appropriate form of development for the application site.

PRINCIPLE OF DEVELOPMENT

5.5 As mentioned, the previous dental surgery building has been demolished and the extant scheme establishes the principle of residential development to be acceptable on this site. Furthermore, the principle of housing on this site is also supported by the principles of Policy H1

5.6 The provision of 9 residential units would directly assist the Borough in meeting its annual and plan period housing targets. This would be in line with Policy H1 '*Provision of Housing*' and the wider objectives of the NPPF that seek to re-use previously developed land and significantly boost the supply of housing.

5.7 the remainder of this Statement will demonstrate how the proposal complies with other policies of relevance:

- Housing Mix
- Affordable Housing
- Character of the Area
- Amenity Issues
- Highway
- Trees and Ecology

HOUSING MIX

5.8 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, and including consideration of any nearby heritage assets or important landscape or townscape areas;*
- *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.*

5.9 The proposed housing mix is as follows:

- 1b2p x 5 (56%)
- 2b3p x 2 (22%)
- 2b4p x 2 (22%)

5.10 Policy H2 also states that net densities of below 30 dwellings per hectare will not be acceptable. Based on 9 dwellings on a 0.1ha the site provides 90 dwellings per hectare which would be within the indicative density range stipulated within Policy H2.

5.11 For developments under 10 units there is no specific mix required by Policy H10. Overall, the development is considered to propose an acceptable variety in the size of units, providing homes suitable for households between 2-4 people.

AFFORDABLE HOUSING PROVISION

5.12 The proposed development comprises 9 residential units. Policy H3 of the Local Plan requires developments of 5-9 dwellings to provide, a financial contribution the equivalent of 20% of the housing to be provided. In all cases where the proposal falls short of the policy as a result of viability, the onus is on the developer to demonstrate the circumstances.

5.13 In regard to this application, the provisions of an agreement between the Council and the Applicant (Owner) dated 27 March 2019, under section 106 of the Town and Country Planning Act 1990, (“the agreement”), govern the Affordable Housing Contribution for the site, as defined in the agreement.

5.14 The agreement provides a detailed methodology to determine the amount of the Affordable Housing Contribution up to a “Maximum Sum” as defined in the agreement for the site including the resultant number of new housing units from this application.

IMPACT UPON THE CHARACTER OF THE AREA

DESIGN

5.15 Policy CC2 ‘*Sustainable Design and Construction*’, requires development to be designed appropriately and efficiently, taking account of the effects of climate change. Additionally, Policy CC7: ‘*Design and the Public Realm*’ requires all development to be of high design quality, maintaining and enhancing the character and appearance of the area.

5.16 The recently published National Design Guide (2019) includes the ten following characteristics that contribute to creating well-designed places which is also a key theme set out at section 12 of the NPPF (2019):

context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

5.17 As demonstrated in subsequent sections of this report, there will be no issues in terms of overlooking or being overbearing. The design of the proposal is contemporary, but clearly responds to the character of the Conservation Area and the nearby listed villas. As such, it is considered that the proposal will not detrimentally impact the character and appearance of the area.

5.18 A detailed design approach is set out within the accompanying Design and Access Statement prepared by ACG Architects which states, inter alia, *“the proposal is for a robust and contemporary building of the highest quality detailing and materiality. It is proposed to use traditional materials in a modern interpretation to embed the building into the site and local surroundings”*.

5.19 Furthermore, the proposed materiality is predominantly a combination of brick and stone. Brick is highly contextual, and a proposed high-quality brick will clad the building where two variations in tone have been selected with one applied to each block. The tone of the brickwork will be soft and light in colour to sit seamlessly in its context.

5.20 The use of stone will emphasise the different proportions of the façade including ornamenting the windows and creating panels alongside the window openings. This material contrasts well with the use of brickwork and is also highly in keeping with the existing materials.

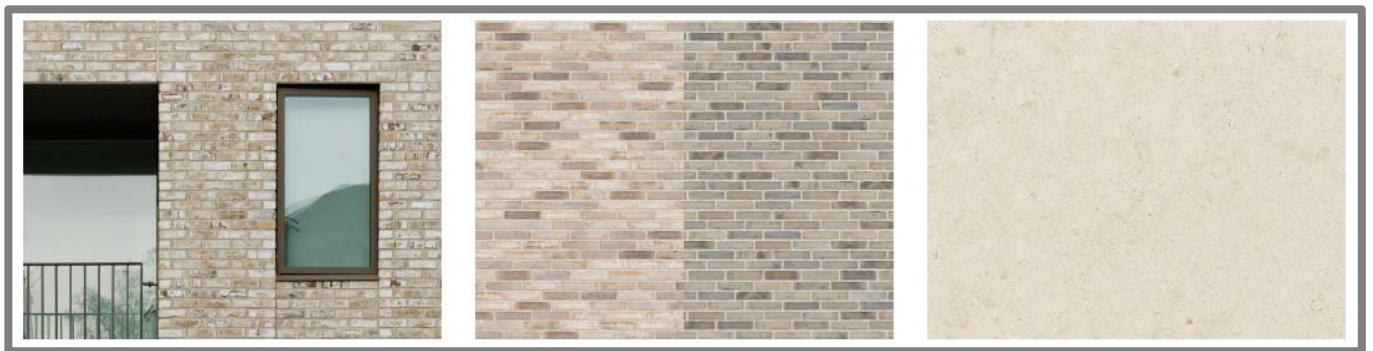


Figure 2: DAS Extract showing proposed materials



Figure 3: Proposed CGI

5.21 Overall, the proposed development has been designed with clear regard to the existing character of the site's surroundings and the wider Conservation Area. The massing has been reduced in comparison to the refused scheme whilst the important 'stepping approach' between Hanover House and Town Place is maintained. The architectural approach, set out in full in the supporting Design and Access Statement, provides a modern but sensitive solution for the site.

HERITAGE IMPACT

5.22 The application is supported by a proportionate Heritage Statement to examine any impact of the proposals have on heritage assets.

5.23 In summary, it is considered that the proposals are able to preserve and enhance what is significant about the setting and character of the Conservation Area and surrounding listed buildings.

IMPACT UPON RESIDENTIAL AMENITY

5.24 Paragraph 127 of the NPPF states that planning should ensure a good quality of amenity for existing and future uses. Policy CC8 'Safeguarding Amenity' seeks to ensure that developments do not cause significant detrimental impacts to the living environment of existing or new residential properties.

IMPACT UPON NEIGHBOURING PROPERTIES

5.25 Owing to the conscious awareness of the site's constraints and the careful formation of its design, the proposed development will not detrimentally impact the amenity of surrounding residents, particularly in terms of overshadowing or overlooking, as outlined below:

OVERSHADOWING

5.26 Hawkins Environmental Ltd have prepared a Daylight, Sunlight and Overshadowing Impact Assessment (March 2021) to accompany the application.

5.27 In summary, the shadow diagrams included within the report demonstrate that the proposed development causes some additional shading to the rear garden of 220 Kings Road (educational establishment) during the latter part of the day. However, the shadow diagrams show that the garden receives plenty of direct sunlight during the rest of the day. Consequently, any impact upon this amenity space is considered to be insignificant.

5.28 It should be noted that the Local Plan (2019) notes that, *"in terms of effects of developments, the Building Research Establishment (BRE) has guidelines on assessing daylight and sunlight effects of development, which the Council will apply flexibly given the high density of the central area"*.

5.29 Consequently, this impact should be considered acceptable given the dense urban nature of the location of the proposed development and the need for high density housing.

OVERLOOKING

5.30 Despite being positioned in an urban environment where some interconnectivity of views between properties should be expected to occur, the windows and terraces of the proposed development have been sympathetically positioned to ensure that no undue overlooking is caused.

DAYLIGHT/SUNLIGHT

5.31 The results of the Hawkins Environmental Assessment show that the proposed development will have a 'minor adverse' impact on three dwellings in terms of daylight/sunlight, however all three dwellings fail to meet the Guidelines by a very small margin and, crucially, where windows do not fully meet the BRE guidance, it does not necessarily mean that the development's impact would be significant or unacceptable.

IMPACT UPON FUTURE OCCUPIERS

5.32 In terms of the living conditions of future occupiers, the sizes, outlook and level of daylight likely to the rooms themselves have also been considered to provide a satisfactory level of amenity for the future occupiers of the new units. The apartments are all good sizes and have been designed to exceed nationally described space standards, and well positioned windows ensure good levels of natural light and ventilation.

5.33 The Hawkins Environmental DLSL Report includes an assessment of the daylighting and sunlighting for the proposed development. In summary, it states that of the 22 habitable rooms assessed, seven rooms do not meet the minimum recommended best practice levels of average daylight (ADF). Of the rooms that fall short, 5 are living room/kitchens, with the other two being bedrooms. Of these seven rooms, five fall short of the recommended best practice level by only a very small margin (i.e. 0.2% ADF or less).

5.34 Furthermore, all of the rooms that fall short of the guidelines are rooms where windows are located within recessed balconies. By their nature, recessed balconies restrict the amount of daylight reaching the windows.

5.35 It is important to note that the BRE Guidance represents '*Best Practice Guidance*' and is not mandatory and, "*should be interpreted flexibly since natural lighting is only one of many factors in layout design*". For example, one must consider that levels of daylight within the rooms that fall short of the guidance are restricted due to the provision of private outdoor amenity space; consequently, any improvements in levels of daylight could be of detriment to the provision of such space.

5.36 Overall, with regard to sunlight within the dwellings, whilst not all windows achieve the guidelines, each dwelling will have at least one window that meets the BRE's recommendations on sunlight. Consequently, all future residents will have access to adequate levels of sunlight.

5.37 Additionally, in accordance with Policy H10 '*Private and Communal Outdoor Space*', all proposed residential units will have access to landscaped communal gardens, together with all but one unit also having private outdoor amenity space in the form of a balcony/terrace.

5.38 Within the accompanying text of Policy H10, it is stated that a key aspect of design quality is ensuring it is clear which areas are communal and which are public. The new boundary treatment proposed to the wall fronting Eldon Road will provide this clarity, whilst retaining the openness of the space, in-keeping with the character of the area.

ACOUSTICS

5.39 One of the considerations of Policy CC8 is to ensure development will not cause a detrimental impact in terms of noise, disturbance and vibration. Accordingly, Impact Acoustics have prepared an Environmental Noise Impact Assessment to accompany the application.

5.40 Overall, based on the calculations and assessments made within the report, the proposed development can demonstrate compliance with the NPPF and the Noise Policy Statement for England (2010), and that with regards to sound, planning permission can be granted with noise conditions.

AIR QUALITY

5.41 Policy EN15 '*Air Quality*' requires development to have regard to the need to improve air quality and reduce the effects of poor air quality. The site is also within an Air Quality Management Area. Aether UK have therefore prepared an air quality assessment to accompany the application.

5.42 In summary, there is no specific requirement for mitigation. However, a number of recommendations are suggested such as providing cycle storage and EV charging points to reduce the emissions arising from the development.

5.43 Overall, the residential amenity of adjoining occupiers and future residents has been thoroughly considered throughout the design process to avoid any unacceptable impacts. The above assessment and accompanying technical reports demonstrate that the proposals accord with Policies CC8, H10 and EN15.

HIGHWAY SAFETY

5.44 Paragraph 109 of the NPPF sets out how development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 5.45 Policy TR3: *'Access, Traffic and Highway Related Matters'* will not permit development that, inter alia, has a material detrimental impact on the functioning of the transport network or would be detrimental to the safety of users of the transport network, including pedestrians and cyclists.
- 5.46 This application is accompanied by a Transport Statement prepared by Connect Consultants Ltd to examine the impacts upon highway safety. It states the 5 one-bed apartments are for 'car-free living' and the four 2 bed apartments will have one onsite car parking space. There will also be one visitor space.
- 5.47 The report concludes, *"as both the permitted and proposed developments have the same number of parking spaces, the number of vehicle movements associated with the proposed development will not likely be significantly different from the permitted development"*.
- 5.48 It continues, *"the prevailing car ownership statistics support the proposal for five flats as car-free homes and four flats with one parking space. The one on-site visitor space will provide visitor parking without relying on on-street parking availability. The proposal therefore satisfies Policy TR5 of the Reading Local Plan"*.
- 5.49 Overall, the development supports the vision of the emerging Reading Transport Strategy and as the effect of the proposed development on highway safety and the road network cannot be considered severe, it must therefore be considered to be acceptable.

IMPACT UPON TREES

- 5.50 Policy EN14: *'Trees, Hedges and Woodlands'* sets out how individual trees, groups of trees, hedges and woodlands will be protected from damage or removal. Additionally, *"new development shall make provision for tree retention and planting within the application site, particularly on the street frontage"*.
- 5.51 The proposed development has been informed by an Arboricultural Statement produced by Hellis Solutions Limited. In summary, no trees are proposed for removal and the report states that the installation or removal of hard surfacing within the root protection areas of retained trees must follow specific guidelines. The activities on this site will also require an arboriculturalist to supervise certain activities at the site and the number/frequency of site visits must be agreed with Reading Borough Council prior to works commencing.

5.52 An Ecology Survey has also been undertaken by Davidson-Watts Ecology which states that if the recommended enhancement measures are built into the scheme (bat/bird boxes) then there would be a long-term net gain for biodiversity. Overall, the proposals accord with Policy EN14.

6. CONCLUSION

6.1 This application seeks full planning permission for the erection of a 3 to 5 storey building to provide 9 apartments, landscaping, car parking and associated works.

6.2 The extant scheme establishes the overall principle of residential development at the site.

6.3 The proposed development is an improvement upon both the extant scheme and previously refused application. The exemplary architectural design is a modern but sensitive approach that has been directly informed by the surrounding Conservation Area and key principles previously established for this site, such as the stepped approach between larger Hanover House and the more domestic Town Place buildings.

6.4 This Statement has set out how the proposals accord with the Development Plan and how there will be no significant impacts in terms of:

- Highways
- Air Quality
- Ecology
- Trees
- Daylight/Sunlight and Overshadowing
- Noise

6.5 As such, we commend the proposals to you.