

163-165 Oxford Road, Reading, Berkshire, RG1 7UZ



Planning Statement

Introduction

Introduction

This Planning Statement is in support of a Full Planning and Listed Building Application for the change of use of part basement, first and second floors from dental surgery (Use Class D1) to residential (Use Class C3).

This statement should be read in conjunction with the submitted existing and proposed plans.

This statement provides information on the background to the site, relationship to surrounding buildings, planning policy at a national, and local level and an assessment and justification of the proposal. The statement has been prepared in full accordance with Government guidance, including DCLG Guidance on information requirements and validation for planning applications.



Planning Statement

Site and Surroundings

Site and Surroundings

The site is currently occupied by a Grade II Listed Building, with the Listing Notice stating the following:

"Early-mid C19 terrace. 2 storeys and basement. Nos 163 and 165 form a 3 storey feature opposite Bedford Road. Red brick with 2 course grey brick band over basement. Stucco cornice and blocking course. Slate roof with brick ridge chimneys. 2 windows each, glazing bar sashes except Nos 149, 151 and 157. Arched doorways with slight recess, panelled doors (mostly 1/2 glazed, some 6 panel), decorated fanlights except Nos 149 and 151 (plain). Nos 155 and 157 have modern shopfronts. No 167 has basement shopfront. Nos 163 and 165 have hipped roof over centre 4 bays, flat eaves and off ridge chimneys, 2 storey recessed end bays with parapet, cornice and blocking course, arched doorways below 1st floor cill band. Ground floor windows round headed. Thin railings before on dwarf walls with wrought iron patterned standards and gates."

The group of Listed Buildings comprise a mix of commercial and residential.

The existing dental surgery is laid out across four floors. However, of these four floors, two floors are unused as actual surgery space and are used for ancillary storage.

Oxford Road is a principal arterial route leading into/out of Reading Town Centre, which is located appropriately 260m to the west. It is also an important bus route. Bedford Road is a major distributor road within the Town which connects Oxford Road to the Town's Inner Ring Road to the east via Chatham Street. Both roads are heavily trafficked.



Site and Surroundings

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires any planning application to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan consists of the following:

- Reading Borough Local Plan (November 2019)

National Planning Policy Framework (NPPF)

Paragraph 7 states the purpose of the planning system is to contribute to the achievement of sustainable development. This is continued in paragraph 8 which states that achieving sustainable development means that the planning system has three overarching objectives:-

- Economic – to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time.
- Social – to 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; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being;
- Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.

Paragraph 38 states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. This was continued in paragraph 39 which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better co-ordination between public and private resources and improved outcomes for the community.

Paragraph 68 states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built up relatively quickly.

Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Paragraph 117 states that 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.

Paragraph 118 states that planning policies and decisions should:-

- encourage multiple benefits from both urban and rural land;
- give substantial weight to the value of using suitable Brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- promote and support the development of under-utilised land and buildings, especially if this would help to meet the need for housing where land supply is constrained and available sites could be used more effectively;
- support opportunities to use the air space above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including, comply with any local design policies as standards), and can maintain safe access and egress for occupiers.

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Paragraph 122 states that planning policies and decisions should support development that makes sufficient use of land, taking into account:-

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services;
- desirability of maintaining an areas prevailing character and setting;
- the importance of securing well designed, attractive and healthy places.

Paragraph 124 states that good design is a key aspect of sustainable development, creates better places in which to live and work and help make development acceptable to communities.

Paragraph 185 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 192 states that in determining applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;

and

- the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 202 states that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Local Plan Policy

Reading Borough Local Plan (November 2019)

Policy CC1 (Presumption in Favour of Sustainable Development) reiterates the presumption in favour of sustainable development as set out in the National Planning Policy Framework.

Policy CC6 (Accessibility and the Intensity of Development) states that 'the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations'

Policy CC7 (Design and the Public Realm) states that all new development must be of high quality design that maintains and enhances the character and appearance of the surrounding area. Proposals will be assessed against the following urban design objectives; character, continuity and enclosure, quality of the public realm and provision of green infrastructure and landscaping, ease of movement and permeability, legibility, adaptability and diversity. Amongst other things development proposals will also be required to respond positively to their local context, create safe and accessible environments and be visually attractive.

Policy EN1 (Protection and Enhancement of the Historic Environment) states that 'all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance.'

Policy EN6 (New Development in a Historic Context) requires development proposals in areas characterised by heritage assets to make a contribution to the historic character 'by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development'.

Policy H2 (Density and Mix) sets out the need for an appropriate residential mix which will be informed by the following criteria:

- 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

Policy H3 (Affordable Housing) requires sites which deliver 5-9 dwellings to provide 20% provision of the total dwellings in the form of affordable housing.

Policy H5 (Standards for New Housing) sets out a criteria for new housing.

Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging) 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.'

Policy CR2 (Design in Central Reading) sets out a criteria which applications for development within Central Reading should demonstrate attributes of. Amongst other things it includes providing frontages that engage with the street scene and ensuring architectural details and materials are of high quality and respect the surrounding area.

Policy CR6 (Living in Central Reading) sets out a criteria which development proposals for residential development in central Reading will be assessed against. Amongst other things this includes providing a mix of

unit sizes, demonstrating that the issue of potential noise and air quality will not negatively impact the residential development and meeting the requirement to provide affordable housing.

Policy CR7 (Primary Frontages in Central Reading) states that uses on the ground floor along the designated primary frontages will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors. New developments (or alterations to existing uses) that front onto any of the designated primary frontages will provide an active building frontage with a display window or glazed frontage at ground floor level, in order to contribute to the vibrancy of the town centre, and provide visual interest.

Policy OU1 (new and existing community facilities) states that proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that it would not lead to a material increase in the need for student accommodation, or that it will be supported by an appropriate increase in existing or planned student accommodation.

New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.

Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.

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Material Considerations

Principle

The proposal is to change the use of part basement, first and second floors of an existing dental surgery.

Core Strategy Policy OU1 (Additional and Existing Community Facilities) states that “proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be demonstrated that there is no longer a need to retain that facility”.

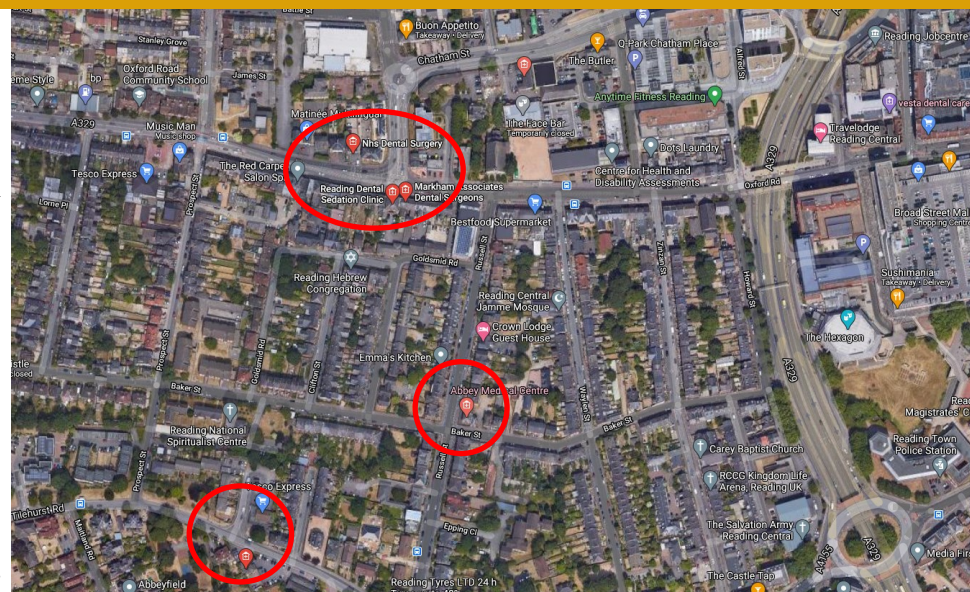
It is clear that Policy CS31 seeks to protect and enhance existing community facilities within the borough. Although the policy does not specifically reference dental surgeries within the policy, it is understood that its primary objective is the retention of such facilities to ensure that local residents have access to services that they need.

This approach is consistent with paragraph 92 of the National Planning Policy Framework (NPPF) which advises that planning decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. However, the NPPF goes on to recognise that such facilities may need to develop and modernise in ways that are sustainable, if they are to be retained for the benefit of the community.

It is important to highlight that the two floors are not actively used to support the dental surgery operations. All the equipment has been removed and the rooms are in a poor state of repair.

Owing to the fact that the dental surgery operations will continue to operate on the ground floor and part of the basement, it is considered that there has not been a net loss of a valued facility and service: the community still has access to the services they need.

Besides, it should also be noted that there is no other evidence to suggest that the loss of the practice has resulted in the local community being unable to access dental services and treatment. As demonstrated below, there are a number of other dental practices, private and NHS, within the area.



This includes a dental surgery in the neighbouring property of 161 Oxford Road.

In particular when examining the NHS Choices list of dentists within 5 miles of the site, thirty-four practices are listed. It is clear that there is no shortage of dentists within the surrounding area of the application site.

Furthermore, the Care Quality Commission (CQC) lists all the dentists available within the Reading area. The CQC lists 54 dentists, including both individuals and organisations. Accordingly, there is no doubt that there are a range of dentists within Reading. The loss of two floors (and part basement) as D1 use would not have a material impact on the community's ability to meet its day-to-day needs and therefore, accords with paragraph 92 of the NPPF.

For the above reasons, it is considered that the principle of changing the use of part basement, first and second floors of the dental practice is considered acceptable.

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Material Considerations

Efficient use of land

Paragraph 118 of the NPPF states that substantial weight should be given to the value of using suitable brownfield land and that the development of under-utilised land and buildings is promoted and supported. The proposal is therefore in accordance with this principle, as the site is poorly utilised, particularly given its size and location in a sustainable area with good access to public transport and shops and services.

The ground floor (and part basement) of the building will be retained in dental surgery use, whereas the first and second floors (and part basement) will be put to use as residential.

In relation to the mix of units proposed, the scheme seeks to create 3 x 1-bed and 2 x studio units.

Policies CS15 and DM5 seek for proposals to provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures, with the DM5 stipulation of at least 50% 3-bed units only applying in 10+ unit schemes (with this scheme below that number of units).

With the policy context in mind it is considered that the proposed mix is suitable in this instance, providing a combination of smaller units.

Moving onto consider affordable housing matters, in line with Policy DM6 a 20% on site provision is required. As the development is for fewer than 5 units, the on-site provision or off-site financial contribution is not required.

The change of use utilises unused floors within the building and therefore makes an efficient use of land.

Design & Appearance

The proposed works focus on the interior, with minimal external alterations required to facilitate the development.

Being a Listed Building, care and attention has been given to retaining and reintroducing historical features which have been lost due to the commercial occupancy.

The front elevation will be given a new lease of life, with the refurbishment of existing windows and a relocation of the dental surgery sign.

The only other external elements are for the benefit of future residential occupiers, including a bin store to the front of the building and a bike store to the rear.

All of these elements are considered to preserve the Listed Building.

Landscaping

No landscaping is proposed.

Impact on Neighbour Amenities

Considering privacy and overlooking matters, it is noted that the building is in excess of 20m (the back to back distance between dwellings referenced within Policy DM4 as usually being appropriate, albeit there is also reference in the supporting text that individual site circumstances may enable dwellings to be closer without a detrimental effect on privacy) of the existing nearby properties.

Given the separation distances, it is considered that the proposals will have no impact on neighbour amenities.

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Material Considerations

Living conditions for future residents

The minimum Gross Internal Area (GIA) standards are set out within the DCLG's Technical housing standards- nationally described space standard (2015). The proposed plans comply with these standards.

The internal layout of the proposed units are arranged so as to create an overall high standard of living accommodation for future occupiers. Although the shape and form of the building has evidently been influenced by the close proximity of nearby properties, the internal layout has been devised as efficiently and effectively as possible with these constraints in mind. Each unit is dual aspect, with suitable sized rooms

The units have also been designed so as to reduce as far as practicably possible instances of overlooking and loss of privacy from existing nearby occupiers. Through the use of careful siting and orientation, direct overlooking from existing nearby occupiers is minimised.

In terms of daylight matters, each room will comfortably meet the recognised average daylight factor (ADF) test

Related to this, future occupiers are considered to receive ample outlook from the proposed units. This is partly thanks to the generously sized windows and partly due to the double aspect provided for the flats in many instances.

Highways

The site is situated within Zone 2 of the Council's adopted Parking Standards and Design Supplementary Planning Document. This area is well served by public transport and is within 2 kilometres (i.e. walking distance) of Reading Town Centre and Reading Railway Station.

In accordance with the Council's adopted parking standards, the flats would require the provision of 1 space per flat, therefore equating to a total provision of 5 off road parking spaces.

Plans indicate that no parking spaces are to be provided; this therefore falls short of the standards. However, given the proximity of the site to the town centre, the good transport links and the ability to control unauthorised on street parking via the parking restrictions in place in the

area and surrounding streets (conditions will stipulate that future occupiers will not be automatically entitled to an on-street parking permit), a reduced provision can be accepted in this instance.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 0.5 cycle parking spaces for each dwelling, therefore equating to a total of 3. The submitted plan indicates provision for 6 cycle spaces, which exceeds the current standards and is therefore welcomed. A compliance condition will ensure the cycle parking spaces are provided in practice.

Finally, owing to the nature of the proposals and proximity to highways / nearby residential occupiers, a construction method statement will be secured via pre-commencement condition.

Listed Building

Planning (Listed Buildings and Conservation Areas) Act 1990 - Recent legal cases relating to issues of the setting of listed buildings have established that under section 70(3) the general power to grant planning permission under section 70(1) is expressly subject to sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 (1), in the determination of applications affecting the setting of a Listed Building, 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.’

Conservation Areas - Section 69 of the Act imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'.

Recent legal cases have established that under section 70(3) the general power to grant planning permission under section 70(1) is expressly subject to section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1) provides that the local authority has a statutory duty that:

‘with respect of any building or other land in a conservation area.....special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.’

At the national level the NPPF sets out a presumption in favour of sustainable development and a key dimension of ‘sustainability’ is defined as ‘...protecting and enhancing our...historic environment’ (DCLG et al, 2012, para 7). The Planning Practice Guide (PPG) (2014) clarifies this additional requirement under ‘What is the main legislative framework for planning and the historic environment?’ where it states that:

In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings

and areas of special architectural or historic interest.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

In terms of the local policy context, the Borough Council is committed to protecting and where appropriate, enhancing the Borough’s historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...” (Policies CS7 & CS33).

The external alterations to the building have been kept to a minimum and are focussed on the reinstatement of historical features which have been lost over time due to the commercial requirements of the dental surgery.

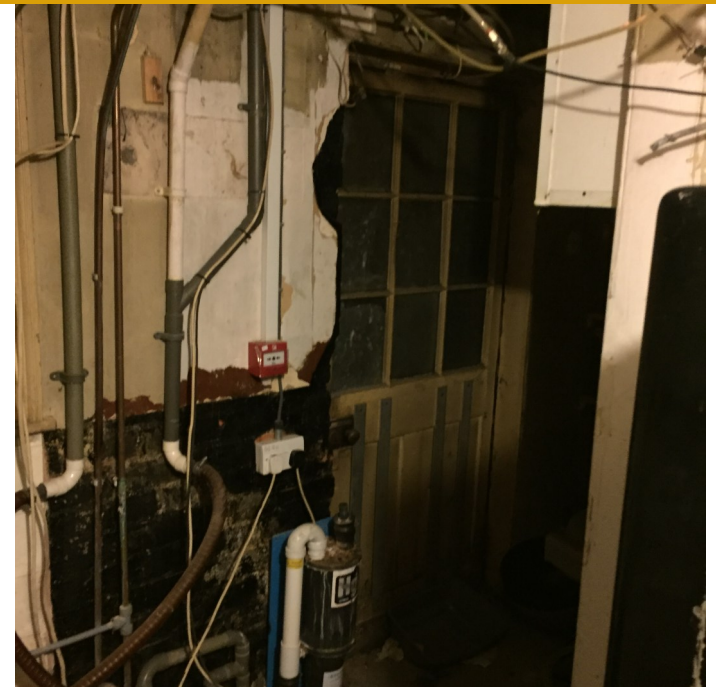
Internally, the changes to facilitate the residential flats are kept to a minimal, seeking instead to utilise the existing layout of the building where possible. This includes the use of existing openings and stairways, aimed at responding to important features of the Listed Building which should be reinstated.

It is therefore considered that the proposals preserve the Conservation Area and Listed Building.

A detailed Heritage Statement has also been provided to detail the significance of the property and the implications of the proposed alterations.

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Material Considerations



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Summary

Waste & Recycling

Waste and Recycling storage is provided to the front of the building.

Sustainability

Paragraph 8 of the NPPF sets out the three key aspects of Sustainable Development:

- Economic
- Social
- Environmental

Considering these aspects against the proposals, the development would achieve the following:

Economic Benefits

- The creation of construction jobs.
- The creation of other jobs in supply chain and wider construction related activities.
- Additional household expenditure and tax income benefitting the local area.
- New homes bonus

Social Benefits

- The delivery of new homes in the borough
- Development in a sustainable location in a settlement with a suitable range of facilities to support future residents.

Environmental Benefits

- Protecting and enhancing the natural built, and historic environment
- Reinstatement of historical features
- Sustainable form of construction reducing the pressures on energy.
- A sustainable location of the proposal means that future residents have the option of using sustainable forms of transport for everyday trip to use services/facilities.

It is considered therefore that the proposed development would generate significant economic, social and environmental benefits and there are no adverse impacts that would significantly and demonstrably outweigh said benefits.

Summary

This Planning Statement is in support of a Full Planning and Listed Building Application for the change of use of part basement, first and second floors from dental surgery (Use Class D1) to residential (Use Class C3).

The principle of development is acceptable, with the re-use of a brownfield site in a sustainable location, with easy access to the train station, bus stops and the Town Centre.

As the changes relate only to the internal layout of the building, there will be no impact on the wider Conservation Area or neighbours. However, the development has focussed on reinstating historical features which have been lost through the use as a dental surgery.

The proposed residential accommodation will either meet or exceed national minimum space standards and will have adequate outlook, and access to daylight/sunlight.

It is considered that the development is in accordance with the Development Plan and the NPPF (2019). We therefore respectfully request that full planning permission and Listed Building consent is granted.