

Planning Statement

**263 Oxford Road, Reading, RG1
7PY**

Prepared For
HARVINDER SINGH LUTHRA

8980
February 2020

Including:

Design and Access Statement

Heritage Statement

Affordable Housing Statement (Heads of
Terms)

Air Quality Assessment

Noise and Vibration Assessment

Infrastructure



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1 INTRODUCTION

- 1.1 This statement is submitted to provide the planning justification for the change of use from A3 (restaurants and café) and C4 (small HMO) to C1 (serviced apartments) with external alterations at 263 Oxford Road, Reading, RG1 7PY.

SITE AND SURROUNDINGS

- 1.2 263 Oxford Road is located on the southern side of Oxford Road, within the settlement boundary of Reading. To the east the terraced properties are in residential use. To the west, the property 265 Oxford Road is in a mixed residential use at present (C3 and C4). It is subject to a separate planning application for the change of use of first and second floors from C4 to C3 with external alterations.
- 1.3 Oxford Road West is identified in the Local Plan as being a District Centre. The property is identified in the current proposals map as having a key frontage in a District Centre.
- 1.4 The property is not listed and it is not within a Conservation Area (although we note that there is an ongoing consultation (until 7th February 2020) suggesting the expansion of the Russell Street/Castle Hill Conservation Area to include the application site). To cover the event that this Conservation Area extension is agreed prior to the determination of the application, we provide a Heritage Assessment and a Design and Access Statement in this report (validation requirements for a Conservation Area) to show how the proposals would be acceptable, irrespective of whether the Conservation Area extensions are agreed.
- 1.5 The site is in flood zone 1 and therefore not likely to be prone to flooding.
- 1.6 Oxford Road is a designated cycle route and classified highway network. The property is within a sustainable location; it is in close proximity to the Reading West railway station and there is a regular bus service into the centre of Reading. There are a wide range of services and amenities provided for along Oxford Road, all within walking distance of the site.



Figure 1 – Street view of 263 Oxford Road

1.7 This planning application relates to the ground, first and second floor of 263 Oxford Road.

PLANNING HISTORY

1.8 A review of the planning register for the site reveals the following planning history of relevance:

- 880126 – Change of use from retail to office (Class A2) on ground floor section 32 - granted
- 060723 or 06/01267/FUL/AED – Change of use from A2 on ground floor to A3 with proposed single storey rear extension and internal changes to first and second floor accommodation – granted
- 120427 or 12/01913/APPCON – Discharge of conditions 2, 3, 4, 5, 6 and 7 of planning permission 06/01267/FUL – granted
- 130179 – Change of use of property from A2 to A3 use – granted
- 190428 – Certificate of lawfulness for the existing use of the first and second floors as an HMO – Lawful use granted



PROPOSAL (DESIGN AND ACCESS STATEMENT)

- 1.9 Planning permission is sought for the change of use from A3 (restaurants and café) and C4 (small HMO) to C1 (hotel (serviced apartments)) with external alterations, principally the inclusion of a replacement front dormer and a rear mansard style roof.
- 1.10 The apart-hotel will be divided into 4 separate “apartments”, two at ground floor level proposed (alongside a communal laundry room), one at first floor and one at second floor level.
- 1.11 The external changes comprise of the following:
- Enlargement of the dormer window to the front;
 - Change to the ground floor front elevation to remove the shop front
 - Enlargement of rear Velux window; and
 - Creation of mansard style dormer on the side of the roof of the rear protruding element of the existing building.
- 1.12 A cycle bunker and refuse and recycling bins are proposed to the front of the building.
- 1.13 No car parking is proposed with this planning application.



2 PLANNING POLICY CONSIDERATIONS

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

2.2 The relevant development plan for Reading Borough Council comprises the following:

- Reading Borough Local Plan (November 2019).

2.3 The National Planning Policy Framework (NPPF) 2019 is a material consideration. As is the Community Infrastructure Levy Charging Schedule and the following supplementary planning documents:

- Revised Parking Standards and Design Supplementary Planning Document; and
- Planning Obligations under Section 106 Supplementary Planning Document.

NATIONAL PLANNING POLICY FRAMEWORK

2.4 The National Planning Policy Framework (NPPF) 2019 sets out the national planning advice to be taken into consideration by those making decisions. The NPPF does not change the statutory status of the development plan as the starting point for decision taking.

2.5 It sets out a presumption in favour of sustainable development as a golden thread running through both plan-making and decision taking. Sustainable development requires consideration of three equal dimensions, relating to the social, environmental and economic impacts of development.

PRINCIPLE OF DEVELOPMENT

2.6 Policy CC1 (Presumption in Favour of Sustainable Development) of the Local Plan sets out that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the NPPF.

2.7 Policy RL1 (Network and Hierarchy of Centres) of the Local Plan identifies Oxford Road West as a District Centre. The policy requires the vitality and viability of these centres to be maintained and enhanced.



- 2.8 Broadening the range of facilities within District Centres is identified as an improvement that will be acceptable in all centres. Policy RL3 (Vitality and Viability of Smaller Centres) of the Local Plan notes that within Key Frontages, development involving the net loss of A1 (retail) or A2 (financial and professional) to other 'centre uses' will be restricted depending on the number of non A1 or A2 uses in the frontage. Criteria (a) of this policy confirms that the policy only protect A1 and A2 uses, insinuating that any other "town centre" use is of lesser importance to the frontage. The application site is currently an A3 use at ground floor and C4 at first and second floor meaning criteria a) is not applicable.
- 2.9 Turning to criteria (b) this aims to prevent there being consecutive A5 uses. More importantly, it demands that there should be no net loss of 'centre uses' for 'non-centre uses' at the ground floor except in exceptional circumstances. Para 4.6.16 of the supporting policy text identifies the 'centre uses' and 'non-centre uses'. This identifies A3 uses (cafes and restaurants) and C1 uses (hotels) as a centre use. The proposal (at ground floor level where this is relevant) changes from one town centre use to another and therefore meets the requirement to retain a 'centre use' within this District Centre location.
- 2.10 There is no "town centre" policy which requires an assessment of the use on upper floors of a property. Policy RL1 states that residential uses will be suitable on upper floors in the defined network of centres but this is an aspirational policy rather than one that demands only residential use on the upper floors. RL3b) confirms this by stating that on upper floors "other uses **including** residential will be acceptable". The subtext (para. 4.6.16) clarifies further stating that "The policy makes reference to the distinction between 'centre uses' and 'non-centre uses', although it should be noted that it does not relate to upper floors, **where a wide mix of uses will be appropriate.**" (our emphasis).
- 2.11 Whilst there is no policy requirement for the upper floors to be in a town centre use, equally there is no policy preventing it. The planning system and the Reading Borough Local Plan specifically differentiate between C3 (dwelling) and C4 (small HMO uses). Policy H7 seeks to protect the existing housing stock but refers specifically to "residential accommodation" rather than a particular use class. In the absence of any policy which protects HMO uses (and, in fact, the local plan focuses on restricting HMO uses rather than protecting them", this policy is solely protecting C3 residential use.
- 2.12 The proposal is therefore acceptable in principle.



ENSURING PREVAILING HOTEL USE

- 2.13 Paragraph 5.3.27 of the Local Plan explains that *“In recent years, Reading has seen a marked increase in proposals for serviced apartments, particularly in the centre. These uses fall halfway between hotels and housing, providing basic facilities for self-sufficient living but also the amenities of a hotel. They are attractive to people who will stay in the area for weeks or months at a time. However, these uses should not be seen as a way of introducing flats by the back door and therefore avoiding the need to contribute towards the provision of affordable housing. There will need to be restrictions applied through Section 106 agreements or conditions to ensure that development does not change its character to a residential development without planning permission, and a requirement to provide regular monitoring information on length of occupancy.”*
- 2.14 This restriction makes sense and is understood. The applicant will therefore accept the restrictions on occupation through either a condition or a S106 agreement. The Council, in approving an apart-hotel at 34 St Marys Butts (application 190364) suggested the following restrictions:
- 1) no Apartment shall be used for any use other than as a C1 (serviced apartments) Use;
 - 2) no Apartment shall be used or occupied as a residential dwelling or dwelling-house (C3 Use);
 - 3) not to let or licence for occupation or permit or suffer occupation of any of the Apartments for a continuous period of more than 3 months to the same occupier or occupiers;
 - 4) other than those Customers staying in accordance with the above, not to let or licence for occupation or permit or suffer occupation of any Apartment for a continuous period for more than 3 months to the same Customer or Customers;
 - 5) not to require Customers of any Apartment to agree to any minimum period of occupation (of whatever duration);
 - 6) to provide to the Council within 14 days of written request evidence regarding the use or occupation of the Apartments or any of them.



DESIGN

- 2.15 Policy CC7 (Design and the public realm) of the Local Plan requires all development to be of a high design quality that maintains and enhances the character and appearance of the area.
- 2.16 External changes are proposed to 263 Oxford Road to include the enlargement of the second-floor dormer. As demonstrated by Figure 2 below, there are varying sizes of dormer windows at second floor thereby setting the precedent for the enlargement of the second-floor dormer window. This change will maintain the character that exists along Oxford Road.



Figure 2 – Photograph of the properties opposite 265 Oxford Road, i.e. along the north of Oxford Road

- 2.17 The external alterations at ground floor would result in a reduction of the expanse of glazing/shutters providing a more residential appearance to the building. This would be in keeping with the residential properties to the east of the site. Whilst policy seeks the protection of shop fronts in the area, this is in context of protecting retail uses. The current restaurant frontage is of poor quality and makes no positive contribution to the area. If it is acceptable (as demonstrated above) to change from the A3 use to another town centre use, then it must be acceptable for appropriate visual changes to the building to be made as well.
- 2.18 The alterations to the rear to include an enlarged Velux window and the creation of a mansard style dormer which would be well screened from the public realm. Within this area the appearance of the rear of the properties / buildings varies significantly, consequently the insertion of a dormer would not cause any significant level of harm on the character and appearance of the local area. In any case, the Council has recently approved similar dormers in



the area as shown on the photograph at figure 3 below. The proposed dormer is in keeping with the character of the area and will have little visual impact.

- 2.19 Bins and cycles are not currently catered for at the property. The proposal introduces a new cycle and bin store to the front of the property. Whilst not ideal, there is no access through to the rear yard of the property, either internally or externally, and therefore there is no alternative. This is commonplace on Oxford Road where, as shown in figure 2 above, bins are stored to the front of the site and it is the current arrangement for the site. Therefore, bespoke and secure stores will tidy up the appearance of the properties.



Figure 3 – rear dormers similar to the proposed at the rear of the site.

- 2.20 The proposal would comply with Policy CC7 of the Local Plan.

AMENITY

- 2.21 Policy CC8 (Safeguarding Amenity) of the Local Plan requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties.
- 2.22 The proposed change of use would introduce a land use that is in keeping with those in the local area and not dissimilar to the existing use on the first and second floor. This is because serviced



apartments are similar in nature to a residential use as people would be residing here and carrying out relatively similar day to day activities as those within the adjacent residential units. As a result, the proposed C1 use would not give rise to any additional amenity issues.

- 2.23 The external alterations proposed have been sensitively developed to ensure that there would be no privacy or overlooking for existing adjacent residents, to ensure they would not impact on neighbours' access to sunlight or daylight and to ensure they do not appear visually dominant or overbearing. There would not be a harm to nearby residents' outlook.
- 2.24 The proposal meets the requirements of Policy CC8 of the Local Plan.

ACCESSIBILITY

- 2.25 Policy CC6 (Accessibility and the Intensity of Development) of the Local Plan requires the scale and density of development to be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.
- 2.26 The site is located on Oxford Road which is recognised as being a District Centre this means that there are a significant number of services and facilities within the centre and therefore within close proximity to the site. Within walking distance there are supermarkets, food outlets, post office, estate agents, school, etc. Reading West railway station is within 100m of the site and there are regular bus stops along Oxford Road providing a frequent public bus service into the main Reading centre.
- 2.27 No car parking spaces are proposed for the new use. Strictly speaking this does not meet the parking requirements set out within the Revised Parking Standards and Design Supplementary Planning Document. The application site is in Zone 2. In zone 2 and HMO should provide 0.25 parking spaces per bedroom. The site already has a shortfall of 1 parking space for the upper floors. An A3 use should provide one parking space per 7.5m² of floor area and, applying this standard, the restaurant use should provide at least 10 parking spaces. It doesn't. Therefore whilst (where necessary), the parking standards require 0.5 parking spaces per hotel bedroom, at very worst the proposed use generates a need for 3 parking spaces.
- 2.28 The SPD clearly states that "should a developer require fewer spaces than are set out here then there would need to be demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result." This issue is highway safety. The proposed



use will reduce the parking demand for the site and therefore making (according to the parking standards at least) an existing problem better. There will be a positive impact on highway safety.

- 2.29 The site is within an extremely accessible location meaning there is a wide choice of modes of transport placing no reliance on the private car. Not meeting the car parking standards within this location should be considered an appropriate departure from policy given the existing uses as a fall-back position.

WASTE AND RECYCLING

- 2.30 The proposal accommodates waste and recycling storage to the front of the property. Storage sheds are proposed to provide appropriate screening of the bins whilst ensuring easy access. This meets the requirement of Policy CC5 (Waste Minimisation and Storage) of the Local Plan.

AIR QUALITY ASSESSMENT

- 2.31 The site is already in a form of residential use including 3 bedrooms facing Oxford Road). The proposed use on the upper floors will have the bedrooms at the rear and living accommodation on the front elevation. Whilst there may be a front facing bedroom at ground floor level, overall there is therefore a reduction in bedroom windows (which are normally required to be open in summer months) facing Oxford Road.

NOISE AND VIBRATIONS ASSESSMENT

- 2.32 As with Air Quality above, the site is already in a form of residential use including 3 bedrooms facing Oxford Road. The amount of front facing bedrooms therefore reduces and there is therefore a reduction in any noise and vibrations from Oxford Road, as the main thoroughfare.

INFRASTRUCTURE

- 2.33 In accordance with Policy CC9 (Securing Infrastructure) of the Local Plan, CIL payments may be necessary for this proposed development. For hotels, the borough wide rate is £120 per square metre. A CIL questions form accompanies this planning application.



3 HERITAGE STATEMENT

- 3.1 The site is not currently in a Conservation Area. As indicated above, it is possible that this may change during the course of the application and therefore, for the sake of ensuring that the consideration is covered, we will provide a Heritage Statement on the assumption of adoption of the proposed conservation area extensions.
- 3.2 The consultation document for the Conservation Area extension addresses the reasons for the extension and refers specifically to the OXFORD ROAD CHARACTER AREA. With relevance to the application site (anecdotally rather than specifically) it states that:

“the inclusion of 205 to 283 Oxford Road (odds) on the south side of the Oxford Road from Prospect Street to the railway bridge... The largest extension proposed within the appraisal is along the Oxford Road, expanding the 2004 boundary that runs down the centre of the road between the IDR and Prospect Street. The extension includes all properties fronting Oxford Road along the south between the Inner Distribution Road (IDR) and the Reading West railway bridge and a majority of sites along the north side of that road although the most of the modern sites are excluded. The area also includes a section along Prospect Street to the south along both sides of that road.

The historical importance justifies the extension as the Oxford Road is one of the two major routes to the west out of the town centre, from which the infill residential streets of the area were developed. The special and varied early to mid-19th century character of the Oxford Road extends clear to the railway bridge. This area has an evidential mix of Georgian and Victorian built environment, noting that the Oxford Road to the west of the bridge is entirely devoid of Georgian built structure. Along this half mile stretch of the Oxford Road, a substantial proportion of the properties were built prior to 1833, and the route contains 40 listed properties.

These factors reinforce the high value of this road both to Reading’s history and the history of the area. This proposed boundary change denotes a significant change from the 2004 appraisal in terms of understanding the Conservation Area itself and how the Oxford Road is an integral element of the area. Additionally, within this character area, one of the first two connector roads from Oxford Road to the south was Prospect Street which was integral to the development of the grid system of residential streets laid out over the 19th century. The buildings on this street reflect strongly the same time periods of development that took place along the Oxford Road. 1-9 Prospect Street is a rare Georgian terrace of workers’ cottages c.1820s, and part of the pattern of speculative housing development that extended



up from the Oxford Road. Along with Prospect Mews, their contrast with the large houses of Sidney Terrace immediately to their north aids in the understanding of early housing for labourers and artisans in the area. The larger houses from 11-23 Prospect Street are also part of that earlier development phase and built prior to 1833. On the west side of the street, the larger Edwardian semi-detached houses have attractive polychrome brick and terracotta embellishments and give a sense of historical balance to both sides of the street essential in proper conservation area designation.

- 3.3 It is clear from this assessment that the focus is on the historic importance of the *area* in a sense of spatial planning and evolution of the historic townscape rather than the importance of individual buildings.
- 3.4 This is important to the consideration of the application given that the proposal will not alter this townscape perception, reusing the existing buildings rather than seeking their replacement. The visual changes from the front are limited to the new dormer window (which, as explained above, takes its design influence from dormer windows immediately opposite). To the rear, the new mansard style roof is not going to be visible from the street scene. It matches similar style roofs in the vicinity of the site and it won't impact on the spatial importance of the townscape.
- 3.5 The proposed development therefore satisfies the requirement of S69 of the Planning (Listed Building and Conservation Areas) Act 1990 which requires the conservation area to be preserved or enhanced.



4 CONCLUSION

- 4.1 As demonstrated above, the principle of development is acceptable as a 'centre use' within the District Centre would be retained. The local plan does not protect the HMO use on the upper floors. The proposed apart-hotel use can be ensured through a suitably worded planning condition or a s106 agreement.
- 4.2 The proposed external alterations are in keeping with the character and appearance of the local area.
- 4.3 No amenity impacts would arise for existing and proposed residents.
- 4.4 The site is sustainably located as it is within a highly accessible location. No car parking is proposed in association with the development which is appropriate as the site is so well located with regard to accessing services and facilities by foot, cycle or public transport. The demand for parking compared to the existing uses is reduced.