

Planning Statement

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

Prepared For
Kennet Investments Ltd

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 Planning permission is sought by Kennet Investments Ltd for the change of use of first and second floor from C4 (Small HMO) to two C3 (flats) with external alterations and extensions at 265 Oxford Road, Reading, RG1 7PY.

SITE AND SURROUNDINGS

- 1.2 265 Oxford Road is located on the southern side of Oxford Road, within the settlement boundary of Reading. To the east is 263 Oxford Road which is in a mixed use at present (A3 and C4). It is subject to a separate planning application for change of use from A3 and C4 to C1 at ground, first and second floor with external alterations. To the west, the building is in a commercial, retail, use.
- 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 close to the Reading West railway station and there is a regular bus service into the centre of Reading which is also accessible on foot. 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 and 265 Oxford Road. 265 Oxford Road is on the right hand side

- 1.7 This planning application relates to the first and second floor of 265 Oxford Road. The ground floor is a separate planning unit as explained in the planning history below.

PLANNING HISTORY

- 1.8 A review of the planning register for the site reveals the following planning history of relevance:
- 190952 – Change of use of ground floor from Class A5 (Hot food takeaways) to C3 (dwelling houses) to comprise 2 x 1-bedroom flats. Prior Notification under Class M, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 as amended 2019 – granted.
 - 190427 – (First and Second Floor) – Certificate of lawfulness for the existing use of the first and second floors as a C4 small HMO (for up to six persons) – granted.
 - 140852 – Retrospective application for change of use to A5 take-away and retrospective single storey rear extension 3.7m deep by 2.5m wide – granted.
 - 061225 – Change of use from sui generis on ground floor to A3 with proposed single storey rear extension and internal changes to first and second floor accommodated – granted.



- 1.9 The lawful use of the building is therefore A5 on the ground floor, with all the paperwork ready to enable the conversion to residential (C3), and C4 on the first and second floors. This application does not need to revisit the PD *consents* on the ground floor.

PROPOSAL (DESIGN AND ACCESS STATEMENT)

- 1.10 Planning permission is sought by Kennet Investments Ltd for the change of use of first and second floor from C4 (Small HMO) to C3 (dwelling houses) with external alterations, principally the inclusion of a front dormer and a rear mansard style roof.
- 1.11 At first floor, a one-bedroom flat is proposed with a separate kitchen & dining and living room with one bathroom. This flat would have a floor area of 56m²
- 1.12 At second floor, a one-bedroom flat is also proposed with open plan living, kitchen and dining space. The one bedroom would be to the rear adjacent to the bathroom. This flat would have a floor area of 46m².
- 1.13 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 and make a more domestic appearance for the approved ground floor flat by reducing the expanse of window and door openings;
 - Enlargement of rear Velux window; and
 - Creation of dormer on the side of the roof of the rear protruding element of the existing building.
- 1.14 A cycle bunker and refuse/recycling bins are proposed to the front of the building.
- 1.15 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 is the 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 NPPF 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.
- 2.6 Section 7 of the NPPF is titled ensuring the vitality of town centres. This section of the NPPF notes that planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability. It recognises that residential development often plays an important role in ensuring the vitality of centres. It supports residential development and suggests it should be encouraged on appropriate sites.



PRINCIPLE OF DEVELOPMENT

- 2.7 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.
- 2.8 Policy H1 (Provision of Housing) of the Local Plan identifies that provision will be made for at least an additional 15,847 homes in the Borough between 2013 and 2036.
- 2.9 The proposal would provide two additional residential units which would make a positive contribution to the housing figure.
- 2.10 Policy H2 (Density and Mix) of the Local Plan requires a mix of housing and that it should meet the needs for the mix of housing set out in figure 4.6 of the Local Plan.
- 2.11 The proposal would provide two one-bedroom flats. This is a necessity of converting the existing building. In other words, there is insufficient space to satisfy the space standards for any more than 1-bedroom flats and therefore it is not possible to deliver a better mix of housing.
- 2.12 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. It identifies that at upper floors residential use would be an improvement that is acceptable in all centres. There is no policy in the local plan that requires the protection of C4 uses. The principle of changing the use of the first and second floor from C4 to C3 is therefore supported by this Policy.
- 2.13 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' looks to protect **ground floors** of buildings. As this change of use application only relates to the first and second floor, this Policy is not applicable.

DESIGN

- 2.14 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.
- 2.15 External changes are proposed to the application property which include the enlargement of the second-floor dormer. As demonstrated by Figure 2 below, there are varying sizes of dormer



windows at second floor level nearby (of similar scale to the proposed dormers) and therefore these are part of the established character of the area. 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

- 2.16 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 protection retail uses. As the retail use will be lost to residential through the permitted development changes (a material consideration to this planning application) there can be no objection in principle to the changes at ground floor level.
- 2.17 The alterations to the rear to include an enlarged Velux window and the creation of a dormer 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.
- 2.18 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.

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

AMENITY

2.20 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.

2.21 The proposed change of use would introduce a land use that is in keeping with those in the local area. Whilst it is noted that the building is adjacent to a commercial unit this unit operates during day time hours only meaning there would be no noise disturbance during the evenings or overnight.

2.22 The first and second floors of 265 Oxford Road have been in a type of residential use (C4) since 2008 and no amenity issues have been raised during this 11 year period. A C3 is similar in nature to that of a C4 use and as a result 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.

PRIVATE AND COMMUNAL OUTDOOR SPACE

- 2.25 Policy H10 (Private and Communal Outdoor Space) of the Local Plan requires dwellings to be provided with functional private or communal open space wherever possible. Ideally, flats should benefit from 25m² of communal space per flat. The existing situation is, however, a material consideration. The current C4 use on the upper floors of the property does not benefit from any communal external space as under both the current A4 use and the proposed C3 use the ground floor remains as a separate planning unit(s) and they, solely, have access to the rear yard of the property.
- 2.26 The Council's Residential Conversions Supplementary Planning Document (Nov 2013) states at paragraph 2.14 that *"when considering HMOs an equivalent level to a house will be considered appropriate, in that the useable private outdoor space should be no less than the gross floor area of the dwelling to which it relates"*. Using this test the existing C4 use should provide amenity space of 75m² (the equivalent to the existing floor area) and therefore, rather than exacerbating the existing shortfall the proposal alleviates it. The result is a shortfall of amenity space of 50m² rather than 75m² currently and therefore the situation improves when compared to the fall back of the existing use.

ACCESSIBILITY

- 2.27 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.
- 2.28 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.

- 2.29 No car parking spaces are proposed in association with the change of use which 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. The parking standards require 1 parking space per 1 bed flat. There is therefore a shortfall of 1 parking space according to the standards.
- 2.30 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.
- 2.31 In all likelihood, the occupiers of the proposed dwellings will not own a car because the housing will be low cost, not suitable for family living and there is no requirement to have one for everyday living. Even if they do own a car, what are the implications to highway safety? The application site is on the main road network but to the rear it is located in a residential area where there is unrestricted parking on the roadside. Ultimately, somewhere will be found to park. An additional car will not be noticeable on the highway network. If occupiers find that parking is not readily available in the surrounding area, then this will be a further disincentive for them to own a car.
- 2.32 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. Such an approach has been accepted in similar locations nearby.

AFFORDABLE HOUSING (HEADS OF TERMS)

- 2.33 Policy H3 (Affordable Housing) of the Local Plan requires developments of all scales to make provisions for affordable housing. On sites of 1-4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.



- 2.34 There is a conflict between this policy and the NPPF guidance which states that no contributions are required for schemes of less than 10 units however we accept that on examination, the Inspector concluded that the Council's policy was acceptable. The onus remains on the Council to demonstrate that there are special circumstances to justify an affordable housing contribution. If this is satisfactorily demonstrated, then the affordable housing contribution will be secured by S106 agreement.
- 2.35 The Heads of Terms will be 5% of the total GDV of the application site (based on comparative valuations from qualified persons).

WASTE AND RECYCLING

- 2.36 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

- 2.37 The site is already in a form of residential use including 4 bedrooms (3 facing Oxford Road). The proposed flats will have the bedrooms at the rear and only have 2 bedrooms. There is therefore a reduction in the intensification of use of the site and therefore any lack of air quality will have a reduced impact on residents.

NOISE AND VIBRATIONS ASSESSMENT

- 2.38 As with Air Quality above, the site is already in a form of residential use including 4 bedrooms (3 facing Oxford Road). The proposed flats will have the bedrooms at the rear and only have 2 bedrooms. There is therefore a reduction in the intensification of use of the site and therefore any noise and vibrations from Oxford Road, as the main thoroughfare, will have a reduced impact on residents.

INFRASTRUCTURE

- 2.39 In accordance with Policy CC9 (Securing Infrastructure) of the Local Plan, CIL payments may be necessary for this proposed development.
- 2.40 For residential developments, the borough wide rate is £120 per square metre. A CIL questions form accompanies this planning application and CIL will be paid where liable.



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 residential use at first and second floor is acceptable within District Centres. There is no policy which requires the retention of HMOs and therefore the change of use is to be judged on the site specific issues of which none represent any harm.
- 4.2 The proposed external alterations are in keeping with the character and appearance of the local area and would not harm the spatial characteristics of the conservation area (should the site be included in the conservation area during the course of the application).
- 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.