

DELEGATED APPLICATION REPORT

Application Reference: 200582/FUL

Address: 34, 36 and 36a Mill Road

Proposal: Two storey side and single storey front extensions at 34 and 36A Mill Road, two storey rear extensions at 34 and 36 Mill Road, single storey rear extension 34 Mill Road and loft conversions with flat roof dormers at 34, 36 and 36A Mill Road. To change the use from three houses to two houses, one ground floor apartment, one first floor apartment and two second floor studios.

Applicant: Mr E Jennings

Target Date: 20/07/20

1. The Site and Surrounding Area

The site in question is located in Caversham on the eastern side of Mill Road. The site consists of three terraced properties. To the north lies a pair of semi-detached properties, connected to the application site by two garages (one within the site curtilage). Beyond this to the north lies a larger terrace consisting of eleven properties. To the south of the site lies a pair of semi-detached properties, and to the south-east lies a terrace.

The front of the site faces towards the side elevation of a row of terrace properties along Queen's Road.

The site is located within Flood Zones 2 and 3.

2. Proposal

Full planning permission is sought for the conversion of no. 34 Mill Road to two apartments (1 x ground floor, 1 x first floor), retaining nos. 36 and 36A (spread over a ground and first floor), and the creation of two studio apartments on a newly constructed second floor.

Given that nos. 36 and 36a would have dwellings above, they are not considered to be proposed houses (contrary to the description of development), and as such would be considered maisonettes. The proposal is therefore for the conversion of three two storey dwellinghouses into 6 flats.

The existing small terrace of dwellinghouses are proposed to be extended either side to create gable roofs, along with constructing a two storey rear extension across nos 34 and 36. At no. 34, the two storey extension would have a maximum height of 6.5m and width of 7.5m. A single storey rear extension is also proposed to replace the existing conservatory. The two storey rear extension at no. 36 would have a maximum height of 6.5m and a width of 5m. The rear elevations of the three units are proposed to extend to various depths creating a stagger.

In addition, a second floor is proposed by way of an expansive dormer extending across the units (width of 18m). 8 front roof lights are proposed on the front elevation and 6 parking spaces.

Materials are proposed to match the existing dwellings.

3. Plans/ Documents Submitted

39219-01 - Block and Location Plans

39219-03 - Existing Ground Floor Plan

39219-04 - Existing First Floor Plan

39219-05 - Existing Elevations

39219-06 - Proposed Ground Floor Plan

39219-07 - Proposed First Floor Plan

39219-08 - Proposed Second Floor Plan

39219-09 - Proposed Elevations

Design & Access Statement

Flood Risk Assessment Ref: 20-6793 Rev A dated March 2020

Received 21st April 2020

4. Relevant Planning History

A pre-application enquiry was made at the site.

171453/FUL - 2-Storey rear and side extensions with loft conversions and flat roof dormers to create 5 additional flats - Application Returned

5. Consultations

External Consultation

The following addresses were formally consulted via letter on 14/05/20:

2, 4 and 6 Mill Green

30 and 32 Mill Road

11, 13, 15, 17 and 19 Piggotts Road

In addition, a site notice was displayed between 17th May - 7th June 2020.

3 letters of representation have been made (objections) from properties in Piggotts Road, behind the application site, relating to the following matters:

- Affect right to light
- Impact on personal security
- Increase strain on parking provision
- Overdevelopment of the site
- Not in keeping with the character of the surrounding area
- Being overlooked from the second floor studio flats
- Should retain family homes as opposed to converting them
- Would bring more noise to the area

Officer comment: *These points will be covered in the assessment of the application.*

Internal Consultees:

Transport - Revised plans required showing the required vehicle and cycle parking provision.

Ecology - Suitable bat survey required to be carried out and submitted to the LPA prior to determination.

Natural Environment - Amended plans required to incorporate soft landscaping within the frontage of the site.

5. Relevant Planning Policy and Guidance

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

Reading Borough Local Plan (November 2019)

Policy CC1: Presumption in Favour of Sustainable Development
Policy CC2: Sustainable Construction and Design
Policy CC3: Adaption to Climate Change
Policy CC5: Waste Minimisation and Storage
Policy CC7: Design and the Public Realm
Policy CC8: Safeguarding Amenity
Policy CC9: Securing Infrastructure
Policy EN12: Biodiversity and the Green Network
Policy EN14: Trees, Hedges and Woodland
Policy EN16: Pollution and Water Resources
Policy EN18: Flooding and Drainage
Policy H3: Affordable Housing
Policy H5: Standards for New Housing
Policy H8: Residential Conversions
Policy H9: House Extensions and Ancillary Accommodation
Policy H10: Private and Communal Outdoor Space
Policy TR1: Achieving the Transport Strategy
Policy TR3: Access, Traffic and Highway-Related Matters
Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

Supplementary Planning Guidance

Design Guide to House Extensions (2003)
Revised Parking Standards and Design (2011)
Revised Sustainable Design and Construction (2011)
Revised S106 Planning Obligations (2013)
Affordable Housing (2013)
Tree Strategy for Reading (June 2010)

6. Appraisal

The proposal is for the extension and conversion of three terraced properties into six flats/apartments.

The main issues to be considered are:

- a) Principle of development
- b) Design and impact on the character of the site and surrounding area
- c) Impact on neighbouring properties and amenity
- d) Amenity for future occupiers
- e) Other considerations
 - Transport
 - Natural Environment
 - Ecology
 - Affordable Housing / CIL
 - Flooding

Policy H8 of the Local Plan states, *“Proposals to convert buildings into self-contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing”*.

The Policy continues to state; *“Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:*

- *The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;*
- *The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;*
- *There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*
- *There is no inappropriate stacking and location of rooms between units;*
- *Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and*
- *The resulting property or properties would provide adequate internal floorspace and headroom¹ for residents”*.

In addition to this relevant adopted local planning policy the Adopted Residential Conversions SPD (2013), provides further detail. Section A of the SPD, deals with the ‘General Assessment of all Conversions’ (i.e. from C3 dwellinghouses to flats or HMOs (both small C4 use and sui generis HMOs).

a) Principle of development

Policy H8 of the Local Plan states that proposals to convert properties into self-contained flats will only be acceptable subject to certain criteria. The minimum internal floorspace standards for conversions into flats given in Appendix 1 of the Council’s Supplementary Planning Document Residential Conversions (2013) (SPD)

¹

and the HMO Management Fact Sheet 12 (Fact Sheet) seek to provide adequate space within a dwelling for living, sleeping and normal family/household life.

Policy H8 requires that properties to be converted into self-contained flats have four or more bedrooms or measure more than 120m² gross. The application deals with three properties - 34, 36 and 36a Mill Road. Each of these properties falls below the 120 square metres, and none of them contain more than four bedrooms. As such any application proposing to convert the properties into flats will not comply with Policy H8 of the Reading Borough Local Plan (2019), and therefore would not be acceptable in principle. Furthermore, it would result in the loss of three dwellinghouses suitable for single family occupancy.

b) Design and impact on the character of the site and surrounding area

Policy CC7: Design and the Public Realm, which states: *“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”*.

Policy H9: House Extensions and Ancillary Accommodation, which states extensions should: *“Respect the character and appearance of the house in terms of scale, location, materials and design”*.

The proposal involves extensions to the sides of the terrace, hips being made into gables, the installation of a dormer stretching across the entire terrace and rear extensions at both ground and first floor level. In addition to this, 8 rooflights are proposed on the front elevation. The proposed design is considered to be extremely blocky, and disordered. The sheer amount of rooflights detracts from the character of the area, and the dormer stretching across three properties would be monolithic resulting in a detrimental impact. The roof of the proposed rear extensions would also extend above the eaves of the main dwellings meaning that the dormers and roof form of the extension would overlap which is considered a poorly integrated design.

When viewed from Mill Road, the side extensions would not appear subservient additions. Techniques such as setting the extensions down from the ridge of the existing properties, or being set back from the existing front elevation have not been demonstrated.

As such, the proposal would not comply with Policies CC7 and H9 of the Reading Borough Local Plan (2019), nor the Design Guide to House Extensions (2003).

The above assessment should address comments raised in the objections about this matter.

c) Impact on neighbouring properties

Policy CC8: Safeguarding Amenity states that development should not cause a significant detrimental impact to the living environment of neighbouring properties in terms of privacy and overlooking; access to sunlight and daylight; visual dominance and overbearing effects of a development; noise and disturbance; artificial lighting; vibration; dust and fumes, smell; or crime and safety.

The proposal extends the terrace, which will include the building becoming wider and the hips turning to gable ends. Both the semi-detached property to the north and the semi-detached properties to the south have windows looking directly towards the application site. Currently the north facing elevation is 7.5-8m away from the neighbouring property (no. 32 Mill Road), and the south facing elevation 20m away from the neighbouring properties (2 Mill Green). With the proposed extensions, the gap between the north facing elevation and the window of the neighbouring property will close to 4.5m, and the south facing elevation will close to 14m. With the gaps closing a considerable distance, and the changing of hips to gable ends, it is considered that there would be a detrimental impact with regards to outlook as a result of this proposal; in particular, no. 2 Mill Green's rear elevation and amenity spaces looks directly onto the site. Policy CC8 states, "*a back-to-back distance of 20 metres between dwellings is usually appropriate*". Whilst this is side-back (south)/side-side (north); it is similar in the sense it would impact habitable rooms of neighbouring properties.

Despite the issues raised in the objections from properties on Piggotts Road regarding light, overlooking and safety, a back-to-back distance of 20m is maintained with these dwellings. Whilst these properties would notice the increase in bulk of development, it is considered that a suitable and policy compliant distance is maintained so as not result in a substantially overbearing impact or substantially reduce light/ create overlooking to a harmful degree.

Given the above, the proposal is considered acceptable in this regard in relation to the above identified properties in regards to outlook. As such the proposal would not be compliant with Policy CC8 of the Reading Borough Local Plan (2019).

d) Amenity for future occupiers
Space Standards

As per Policy H5, new dwellings are required to meet the nationally described space standards. Only two of the six dwellings comply which is unacceptable. Further detail is given below.

The proposal seeks to create six units. There is a mixture of 1, 2 and 3 beds.

- Apartment 1 (2 bed, 4 person) measures 75sqm - complies with policy (minimum 70 sqm) - flat on ground floor
- Apartment 2 (2b, 4p) measures 63 sqm - falls short (minimum 70 sqm) - flat on first floor
- Apartment 3 (1b, 2p) measures 46 sqm - falls short (minimum 50 sqm) - studio flat on second floor
- Apartment 4 (1b, 2p) measures 43 sqm - falls short (minimum 50 sqm) - studio flat on second floor
- 36 Mill Road (3b, 5/6p) measures 88.95 sqm - falls short (minimum 93/102 sqm) - maisonette arranged over ground and first floors
- 36A Mill Road (2b, 3/4p) measures 79.25 sqm - complies with policy (minimum 70/79 sqm) - maisonette arranged over ground and first floors

With regard to bedroom sizes; in order to provide one bedspace, a single bedroom should have a floor area of at least 7.5 sqm and should be at least 2.15m wide. In order to provide two bedspaces, a double (or twin bedroom) the room should have a floor area of at least 11.5 sqm.

All proposed bedrooms fail to meet these standards, with the exception of the two at no. 36a. The required amount of in-built storage as part of the space standards has also not consistently been shown. In addition, a number of the proposed bedrooms as part of the scheme are to be located at the front of the property which will experience higher noise levels due to the road. As such, it is considered that the placement of bedrooms at the front of the property could also result in a harm to future occupiers.

It is considered that the proposed scheme would fail to comply with Policy CC8 as the living arrangements would have a detrimental impact upon the occupants of the proposed dwellings.

e) Other considerations

Transport

The application site lies within Zone 2, which would require 7 parking spaces (including 1 visitor space). The proposed plan only shows 6 parking spaces which is not compliant with parking standards.

Cycle parking storage has been illustrated in the plans but further details would be required (ie. what type of cycle provision is proposed). Sheffield cycle stands are preferable. In addition, within the Planning Statement submitted, the applicant states they would provide electric vehicle charging points (requirement of Policy TR5). However, no details of this are provided on the plans. However, had the proposal been acceptable in other regards, further information could have been sought from the applicant or extra information secured by way of a suitably worded planning condition.

Nevertheless, as these details have not been submitted at the time of writing, the proposal would not be acceptable on transport grounds (vehicle parking, cycle parking and electric vehicle charging points) contrary to Policies TR3 and TR5 of the Reading Borough Local Plan (2019).

The above assessment should address comments raised in the objections about this matter.

Natural Environment

The application proposes a large area of hard standing to the front of the property in order to create six parking spaces accessed directly from the road and an area on which to locate bin stores. It is noted that two of the existing dwellings already have a large expanse of hard standing to the front of the site, however, this style of parking is not aesthetically pleasing or environmentally sensitive. Likewise the wide open frontage is not in keeping with the overriding character of the adjacent

residential properties in Mill Road. The visual impact of the parked cars and hard standing at the front of the property would have an urbanising effect on Mill Road and the character of the site and prevents any opportunity for any meaningful soft landscaping adjacent to the highway by which to enhance the development.

It is considered that with a greater density of occupation within the site suitable landscaping to the front of the property would be required. This application fails to provide appropriate areas of soft landscaping to the front of the property where it can contribute to the amenity of Mill Road, particularly around the site boundaries. Policy EN14 requires through development, Reading's vegetation cover will be extended and that new development shall make provision for 'tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough in order to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.'

As it stands, based on the above, the proposal is not considered to satisfy Policies EN14 and CC3 of the Reading Borough Local Plan (2019).

It should be noted that it is unlikely that the required parking provision, combined with suitable landscaping, could be achieved based on the above. This is considered to demonstrate the proposal, by way of creating 6 separate units, is an overdevelopment of the site.

Ecology

The site has potential for roosting bats and therefore a bat survey was required to be carried out. However, due to the other concerns raised, the Council did not pursue the submission of a survey in this instance. Nevertheless, as a survey has not been provided, the development is contrary to Policy EN12 of the Reading Borough Local Plan (2019) and Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System.

Affordable Housing/ CIL

Policy H3: Affordable Housing sets out that, "*The following types of residential development will be exempt from the requirement to provide affordable housing:*

- *Replacement of a single dwelling with another single dwelling; and*
- *Conversion of a dwelling to self-contained flats where there is no new floorspace*".

This scheme converts three dwellings into six flats whilst creating additional floorspace; and as such affordable housing would be required.

Policy H3 states: "*on sites of 5 - 9 dwellings, a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough*".

Within their Planning Statement, the applicant stated they agreed in principle to enter into a legal agreement to secure a financial contribution. However, valuations have not been submitted (it would usually be expected for such information to be submitted at the outset) and as the proposal is not considered

acceptable in other planning terms, the Council has not pursued the S106 legal agreement to secure the financial affordable housing provision.

Nevertheless, in the absence of a completed S106 agreement, this forms a reason for refusal of the application.

The development would be liable to the Community Infrastructure Levy.

Flooding

The site lies within Flood Zones 2 and 3 and as such a Flood Risk Assessment has been submitted to support the application. It concludes that to increase sustainability and reduce excavations, existing drainage should be utilised where possible within the new development. Prior to development, these drainage components should be checked for line, blockages and collapse; any defects should be corrected accordingly. The proposed development will see no increase in the impermeable area of the site and as such discharge rates and the volume of discharge will remain/and or be reduced. The risk of surface water flooding is considered to be low based upon the existing site topography and local drainage conditions.

As such, the proposal is considered acceptable in terms of Policy EN18 of the Reading Borough Local Plan (2019).

Equality

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. Conclusion

The proposed scheme would not be acceptable in principle, as the properties do not meet the criteria for conversion; and the scheme is considered to have a detrimental impact upon the character of the surrounding area, neighbouring amenity and the amenity of the occupants of the dwellings.

In addition, the proposal is not satisfactory in terms of transport considerations, Ecological/ Natural Environment considerations and does not provide a policy compliant level of Affordable Housing.

As such, since the proposed scheme would not comply with Policies set out within the Reading Borough Local Plan (2019), as specified in this report.

Recommendation: REFUSE permission for the following reasons:

- 1) The three properties that comprise the application site do not measure more than 120sqm gross each. As such, the sites are not considered of

suitable size to be converted to self-contained flats meaning the proposal is not compliant with Policy H8 of the Reading Borough Local Plan (2019).

- 2) The proposed extensions (side, rear and dormers), by way of their scale, bulk and lack of subservience, are considered a detrimental addition to the street scene and are not considered to suitably integrate with the proportions of the original dwellings. As such, the proposal is considered contrary to Policies CC7 and H9 of the Reading Borough Local Plan (2019) and the Council's Supplementary Planning Guidance 'A Design Guide to House Extensions' (2003).
- 3) The development, by way of its proximity to adjacent dwellings, namely 2 Mill Green and 32 Mill Road, is considered to reduce outlook to the windows of these properties to a substantially harmful degree. As such, the proposal is not compliant with Policy CC8 of the Reading Borough Local Plan (2019).
- 4) The proposed development (Apartments 2, 3, 4 and no. 36 Mill Road) would fail to meet the nationally described space standards for new dwellings as set out in Policy H5 of the Reading Borough Local Plan (2019). In addition, by way of its layout, the proposed development (Apartment 2, 36 and 36A) would also create a poor quality of living accommodation for future occupiers contrary to Policy CC8 of the Reading Borough Local Plan (2019).
- 5) The proposal fails to provide a policy compliant level of vehicle parking provision, cycle provision and Electric Vehicle charging points contrary to Policies TR3 and TR5 of the Reading Borough Local Plan (2019).
- 6) In the absence of a completed preliminary roost assessment, the likely impact the proposal would have on bats cannot be determined (which are a protect species and a material consideration in the planning process) cannot be determined. As such, the proposal is not compliant with Policy EN12 of the Reading Borough Local Plan (2019) or Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System.
- 7) The proposal fails to provide appropriate areas of soft landscaping to the front of the site, and would therefore not contribute to the overall character and appearance and amenity of Mill Road, particularly around the site boundaries. As such, the proposal is contrary to Policies CC3, CC7, EN14 of the Reading Borough Local Plan (2019).
- 8) In the absence of a completed legal agreement to secure an acceptable contribution towards the provision of Affordable Housing, the proposal fails to contribute adequately to the housing needs of Reading Borough, contrary

to Policies CC9 and H3 of the Reading Borough Local Plan (2019) and the Council's Adopted Affordable Housing Supplementary Planning Document 2013.

Informatives

- 1) Refused Plans
- 2) Positive and Proactive