

ATLAS

PLANNING GROUP

PLANNING STATEMENT

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

JANUARY 2020

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Atlas Planning Group in support of a full planning application that seeks to erect a 3-5 storey building and semi-open basement to provide 11 apartments at 1A Eldon Road.
- 1.2 The site benefits from an extant scheme approved in March 2019 (App Ref:180591) that granted permission for a 3-5 storey building, providing 7 apartments.
- 1.3 The proposed development represents an improvement to the previously approved scheme, allowing for a more efficient layout, the creation of a basement and the addition of 4 apartments, without significantly increasing the overall scale of the building and ensuring residential amenity is preserved.

2. SITE DESCRIPTION

- 2.1 The site, which extends to 0.1ha has been cleared of built development following the demolition of the dental surgery (Mulberry House) which was granted through planning applications 171521 and 180591.
- 2.2 The site is situated within the Eldon Square Conservation Area and is bounded to the north by an eight-storey block of flats (Hanover House), which were formerly offices. Bordering the site to the east is a high tree line beyond which is a row of houses at Town Place.
- 2.3 Directly to the south there is a pair of 19th century semi-detached houses (1/3 Eldon Road). To the west, although separated by both Eldon Road and a large area of green space, there is a row of Grade II Listed buildings.
- 2.4 Access to the site is via a ramp to the rear of No. 1 and 3 Eldon Road, via Eldon Terrace, where an area of car parking is located.
- 2.5 The site is sustainably located within Reading and is an approximate 15-minute walk from Reading railway station.

3. PLANNING HISTORY

PRE-APPLICATION 170968/PREAPP

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

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

FULL PLANNING APPLICATION 171521

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

FULL PLANNING APPLICATION 180591

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

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

4. THE PROPOSAL

4.1 The description of development is as follows:

“Erection of a 3 to 5 storey building and semi-open basement providing 11 (5x1bed, 3x2bed and 3x3bed) residential units (Use Class C3), 10 parking spaces, landscaping and associated works”.

4.2 The creation of the semi-open basement level will allow for the provision of 10 car parking spaces as well as providing space for refuse storage, secure bicycle parking and a storage area for residents.

4.3 The scheme seeks to positively improve the buildability and efficiency of the approved scheme, whilst continuing to respect the character and appearance of the surrounding heritage assets and wider street scene.



Figure 1: Proposed South Elevation plan extract

5. PLANNING CONSIDERATIONS

5.1 Reading Borough Council adopted their new Local Plan on the 4th November 2019. The new Plan has replaced the Core Strategy (2015), Reading Central Area Action Plan (2009) and the Sites and Detailed Policies Document (2015).

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

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

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

PRINCIPLE OF DEVELOPMENT

5.3 As mentioned, the previous dental surgery building has been demolished and the extant scheme establishes the principle of residential development to be acceptable on this site.

5.4 The provision of 11 residential units would also assist the Borough in meeting its annual and plan period housing targets. This would be in line with Policy H1 *‘Provision of Housing’* and the wider objectives of the NPPF that seek to re-use previously developed land and significantly boost the supply of housing.

HOUSING MIX

5.5 Policy H2: *‘Density and Mix* states that, *“On new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.”* The policy also lists how the density of residential development will be informed by the following factors:

- *“The character and mix of uses of the area in which it is located, including the housing mix, and including any consideration of any nearby heritage assets or important landscape or townscape areas;*
- *Its current and future level of accessibility by walking, cycling and public transport;*
- *The need to achieve high quality design;*
- *The need to maximise the efficiency of land use; and*
- *The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers”.*

5.6 The proposed development is for 11 residential units and the housing mix is as follows:

- 5 x 1bed (46%)
- 3 x 2bed (27%)
- 3 x 3bed (27%)

5.7 This is an improvement to the approved housing mix for the 7unit scheme (Ref: 180591):

- 1 x 1bed studio (14%)
- 2 x 1bed (29%)
- 4 x 2bed (57%)

- 5.8 Although the number of proposed 3 bed units does not meet the 50% policy requirement, the proposed housing mix is considered to provide an appropriate range of housing and is an improvement to the approved scheme which provided no 3 bed units (albeit the approved scheme did not exceed the 10-dwelling threshold set out in Policy H2).
- 5.9 The supporting text to Policy H2 states, *“inevitably, even with this policy requirement in place, Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation” (our emphasis).*
- 5.10 Part of the evidence base for the emerging Local Plan includes the Berkshire Strategic Housing Market Assessment (SHMA) (2016). Paragraph 49 of the SHMA states, *“in applying policies on housing mix to individual development sites, regard should be had to the nature of the development site and character of the area, and up-to-date evidence of need as well as the existing mix and turnover of properties at the local level”.*
- 5.11 The site possesses a range of constraints including the Conservation Area and the proximity of adjoining occupiers, such factors have dictated the overall scale and layout of both the approved scheme and the current proposals.
- 5.12 The site is also directly adjacent to the City Centre boundary (which neighbouring Hanover House is within) where the policy threshold set out within H2 does not apply. The proximity to the boundary is a key factor to be taken into consideration as it is logical for smaller units to be higher in demand in locations that are easily accessible to and from the City Centre.
- 5.13 Furthermore, the most recent Annual Monitoring Report (AMR) (2018) published by Reading Borough Council provides evidence that new build dwellings permitted during 2017-2018 are mostly 1 and 2 bed flats:

Table 1: Source: Reading Borough Council AMR (2018)

New-build dwellings permitted during 2017-18 by size and type				
Size	Flats	Houses	Total	% of total
1-bed	503	0	503	46.0
2-bed	492	9	501	45.8
3-bed	50	20	70	6.4
4-bed	0	15	15	1.4
5+ bed	0	4	4	0.4
Total	1,045	48	1,093	
% of total	95.6	4.4		

5.14 Alexander House (App Ref: 162057), is similarly located within very close proximity to the Central Area boundary and a planning application was approved in 2017 with the following housing mix that was not policy compliant:

- 30 x 1bed (54%)
- 18 x 2bed (32%)
- 8 x 3bed (14%)

5.15 A Market Report accompanied the above application and showed that demand for 3 bed apartments in Reading is limited. Officers were accepting of such evidence. Furthermore, Officers considered a flatted development more appropriate for the location (close to the city centre) and consequently it would be difficult to comply with the policy requirement.

5.16 Likewise, residential development at 40 Silver Street (150885) was approved with the following housing mix:

- 6 x 1 bed (43%)
- 8 x 2 bed (57%)

5.17 The Committee Report notes the proposal does not meet the policy requirement:

"The proposal is for 8 no. 2 beds and 6 no. 1 bed flats, and therefore the proposal does not meet the policy requirement. However, the flats are edge of centre where high density development providing smaller units would be considered acceptable. The two bed units would be considered to provide the potential to

accommodate families. In terms of the overall size of the proposed dwellings it can be considered to be commensurate with the surrounding flatted developments”.

- 5.18 The location of both applications mentioned above are identified below to show the proximity to the Central Area boundary, which are both a comparable distance to the application site at Eldon Road.

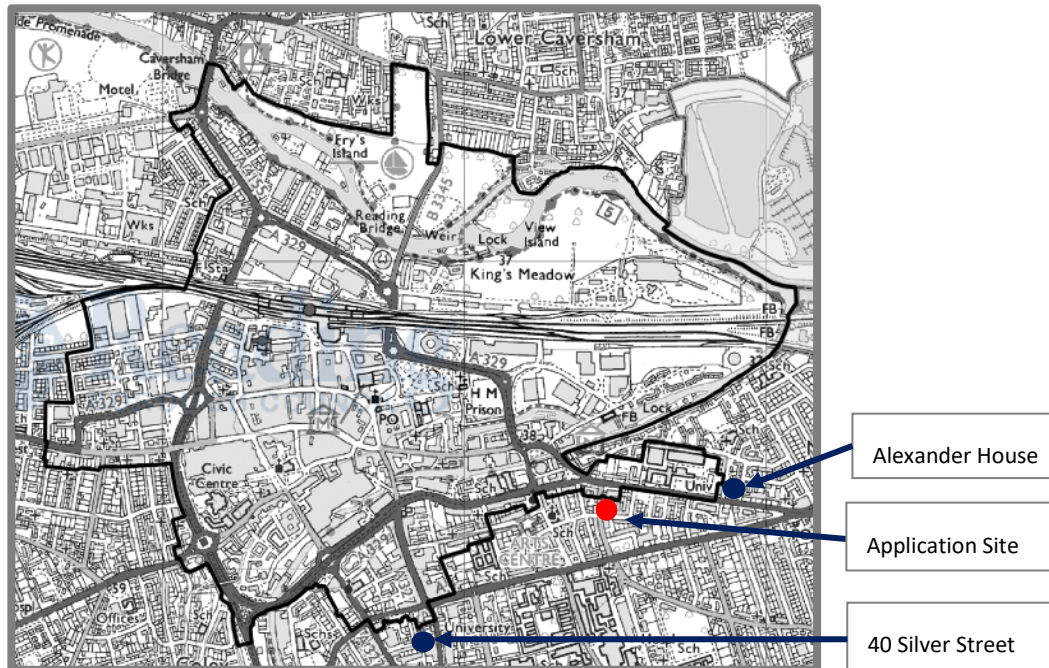


Figure 2: Central Area Boundary

- 5.19 Overall, given the application site already has an extant approval for a flatted scheme, together with the site's proximity to the city centre boundary and other constraints such as the Conservation Area and proximity of adjoining development, it is not feasible for the proposed development to meet the 50% policy requirement.

AFFORDABLE HOUSING PROVISION

- 5.20 The proposed development comprises 11 residential units. As such, in accordance with Policy H3, Reading Borough Council would look to secure 30% affordable housing on sites of 10 or more dwellings. In the first instance provision should be made on site with a financial contribution being negotiated to make up the full requirement as appropriate,

“in all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution”.

5.21 For this application, a Financial Viability Assessment has been prepared by DJC Housing Consultants Ltd. Overall, the findings of the Development Appraisal demonstrate that the proposed Development cannot support the provision of affordable housing.

IMPACT UPON THE CHARACTER OF THE AREA

DESIGN

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

5.23 The recently published National Design Guide (2019) includes the ten following characteristics that contribute to creating well-designed places which is also a key theme set out at section 12 of the NPPF (2019): context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

5.24 As shown by figures 2 and 3 below, the approved and proposed schemes are very similar. The main changes to the design are summarised below and further detail is set out in the accompanying Design and Access Statement Addendum prepared by Icewit Design Ptn:

- Slight increase of footprint to the 4th and 5th floor;
- More efficient internal layouts and associated fenestration arrangements (maintaining an appropriate angled form and screen walls to preserve amenity);
- Relocation of central core to improve circulation and improve aspect; and
- Creation of a semi-open basement to create parking and make efficient use of the site's raised position.



Figure 3: Approved Plan Extract – West Elevation



Figure 4: Proposed Plan Extract – West Elevation

5.25 The appearance and materials follow the principles of the approved scheme, i.e. a high-quality alternative to Bath stone with splayed panels above doors and windows and use of textured stone panels to break up the elevation. The external privacy screen wall to the west is punctured with slots which guide the view away from Hanover House.

5.26 Boundary treatment to the Eldon Road pavement/retaining wall remains the same as the approved scheme i.e. a stepped access will be created to the green space and entrance beyond, recladding of the

retaining wall in a tonally similar material with the addition of a railing and hedgerow. The existing boundary wall, whilst unassuming, is of low quality and incongruous, therefore its replacement with high quality materials represents an opportunity to contribute a positive addition to the Conservation Area in this most publicly visible part of the site. This accords with Policy EN3 which promotes the conservation and enhancement of Conservation Areas.

5.27 The chosen appearance and materials seek to tie the proposals into the established character of the Conservation Area. The application site has been subject to extensive redevelopment and as discussed in the accompanying Heritage Statement, the historic setting of the site has been lost. As such, the design does not intend to create a pastiche of the historic buildings surrounding the site. Instead, the modern development in the Conservation Area has informed the architecture of the application.

5.28 The design of the proposal responds to the practical constraints of the site in an architecturally meaningful way and would be in scale with its surroundings. The proposed design and choice of materials would sit comfortably within its local context and follows the same style as the approved scheme. Furthermore, it relates well to the competing influences of the architecture in the surrounding area and would preserve and enhance the existing character and appearance of this part of the Conservation Area and its historic context.

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

HERITAGE IMPACT

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

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

IMPACT UPON RESIDENTIAL AMENITY

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

IMPACT UPON NEIGHBOURING PROPERTIES

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

OVERSHADOWING

5.34 Hawkins Environmental Ltd have prepared a Daylight, Sunlight and Overshadowing Impact Assessment to accompany the application. In summary, the proposed development will have a negligible impact to all dwellings except one dwelling, which will have a 'minor adverse' impact. However, it is important to take into account the location of the site, immediately adjacent to the Reading Central Area, which the adjoining Hannover House is located within.

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

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

OVERLOOKING

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

5.38 The differential between Hannover House and Mulberry House floor levels has been retained (as per the approved scheme) in order to mitigate against any direct overlooking. Moreover, where necessary the proposals incorporate obscure glazing and/or high-level glazing to ensure privacy of future occupiers and existing adjoining occupiers is preserved.

5.39 Whilst windows on the southern and western elevation are proposed, a significant degree of planting is present in this area, comprising c.18m tall mature trees, separating the proposed development from Nos 1/3 Eldon Road and the terrace of houses to the rear, along Eldon Street. Given that these trees are mature and located within a Conservation Area, they benefit from statutory protection and could not be removed without permission from the LPA. It is considered that the dense screen that these trees provide, would prevent any overlooking and preserve the privacy of the amenity space of the surrounding residents.

5.40 Despite this, it is important to highlight that in accordance with Policy CC8 there is a back-back distance of 20m between terraced houses along Eldon Street and the proposed building.

IMPACT UPON FUTURE OCCUPIERS

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

5.42 The relocation of the access core to a more central location improves internal circulation, reducing long corridors and creating more double and triple aspect accommodation for the benefit of future occupiers. Although previously the location of the core in the north eastern corner of the site prevented overlooking, this has now been achieved by space planning and glazing types.

5.43 Additionally, in accordance with Policy H10 '*Private and Communal Outdoor Space*', all proposed residential units will have access to landscaped communal gardens, together with private outdoor amenity space in the form of terraces.

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

ACOUSTICS

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

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

AIR QUALITY

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

5.48 In summary, there is no specific requirement for mitigation. However, a number of recommendations are suggested, such as a Dust Management Strategy for the construction phase of development.

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

HIGHWAY SAFETY

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

5.51 Policy TR3: '*Access, Traffic and Highway Related Matters*' will not permit development that, inter alia, has a material detrimental impact on the functioning of the transport network or would be detrimental to the safety of users of the transport network, including pedestrians and cyclists.

5.52 The proposed development comprises on-site 10 parking spaces and secure cycle storage for 8-10 bicycles. This application is accompanied by a Transport Statement to examine the impacts upon highway safety.

IMPACT UPON TREES

- 5.53 Policy EN14: *'Trees, Hedges and Woodlands'* sets out how individual trees, groups of trees, hedges and woodlands will be protected from damage or removal. Additionally, *"new development shall make provision for tree retention and planting within the application site, particularly on the street frontage"*.
- 5.54 The proposed development has been informed by an Arboricultural Statement produced by Hellis Solutions Limited. In summary, there are 6 trees currently on site. Four of these are Category B trees that will be retained and 1 Category U tree which will also be retained.
- 5.55 One Category C tree, which is the subject of a Tree Preservation Order will be removed. The tree to be removed is an unremarkable tree of limited merit and its loss will have a minimal impact on the visual amenity of the local area. Additionally, the landscaping proposals will mitigate for the loss of this one tree, providing the opportunity to re-plant with a new mulberry tree that will make a more positive contribution to the Conservation Area.
- 5.56 The proposed development requires the pruning of two trees to provide a 3.0m clearance over the adjacent proposed footpath. The proposed development will encroach within the root protection areas of three trees; however, the construction activity should not adversely impact upon these trees if the precautions detailed within the Arboricultural Method Statement are followed.
- 5.57 Overall, the proposals accord with Policy EN14.

6. CONCLUSION

- 6.1 This application seeks full planning permission for the erection of a 3 to 5 storey building and a semi-open basement to provide 11 apartments, landscaping, car parking and associated works.
- 6.2 The extant scheme establishes the overall principle of residential development at the site.
- 6.3 The proposed development follows the style of the approved scheme's relatively simple, contemporary style providing a transition from the more traditional and historic character of Eldon Road to the large scale and block-like architecture of Hanover House to the north.

- 6.4 The material palette is the same as previously approved and appropriately worded planning conditions can ensure sample materials are approved prior to the commencement of development.
- 6.5 The Committee Report for the approved scheme considered the previous design to both preserve and enhance the setting of the surrounding heritage assets whilst also enhancing the character and appearance of the wider Conservation Area. As the proposals are so similar it is considered that the nearby heritage assets and the wider Conservation Area will continue to be preserved and enhanced.
- 6.6 As such, it is considered that the proposals comply with both local and national policies, including the advice contained in the NPPF and most importantly of all in heritage terms, pass the statutory tests set by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.7 This Statement has set out how the proposals accord with the Development Plan and how there will be no impacts that would warrant refusal of the application. As such, we commend the proposals to you.