

PLANNING STATEMENT

Change of use of residential property (C3) to a 7-bed HMO (Sui Generis)

64 Prospect Street, Reading, RG4 8JN

On Behalf of: Bartlett Property Development Ltd

Report Prepared By: Emily Temple, BSc (Hons) MSc MRTPI
Toby Cowell, MA (Hons) MSc MRTPI

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1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of a 5-bed residential property (Use Class C3) to a 7-bed House of Multiple Occupation (HMO) (Sui Generis).
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by Hives Architects:
- 1:1250 Site Location Plan
 - 1:100 Existing and proposed floor plans
 - 1:100 Existing and proposed elevations
 - 1:200 Block Plan
 - CIL forms
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site comprises a 2.5 story 5-bed terraced residential property, incorporating a basement level, on the northern side of Prospect Street, within the settlement boundary of Reading. The site is located outside of a defined Conservation Area and a District/Local Centre. The site does however form part of an Air Quality Management Area, along with the majority of central Reading and main arterial routes leading out from the town centre.

- 2.2 The site is located within close proximity to the commercial heart of Caversham to the south-west, with the wider streetscene almost exclusively comprising terraced residential properties which vary largely in character, architectural vernacular and scale.

3. Planning History

- 3.1 None available.

4. Policy Assessment

National Guidance

- 4.1 The National Planning Policy Framework (NPPF) is relevant to the consideration of the application. Some weight also needs to be given to the content of the Ministerial Statement, 'Planning for Growth', issued in March 2011.
- 4.2 The 'Golden Thread' running through the centre of guidance within the NPPF is the presumption in favour of sustainable development. Paragraph 38 of the NPPF states that "*Decision-makers at every level should seek to approve applications for sustainable development where possible*". Paragraph 8 of the NPPF comments that planning should "make effective use of land" and ensure that "*a sufficient number and range of homes can be provided to meet the needs of present and future generations*". Paragraph 68 states that "*small and medium sized sites can make an important contribution to meeting the housing requirement of an area.*"

Principle of Development

- 4.3 The application site is located within the settlement boundary of Reading with the property in question already in residential use. The principle of development, namely the change of use to a 7-bed HMO, is therefore considered to be acceptable provided such a change of use fully accords with the requirements of policy H8 of the Local Plan and the Council's Residential Conversions Supplementary Planning Document (SPD).

- 4.4 Policy H8 states that proposals to convert existing residential properties into HMO's 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.
- 4.5 Policy H8 further adds that such proposals will only be considered acceptable where they would: respect the physical character of the area; not unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing; ensure no adverse impacts to residents of the scheme or surrounding property; ensure there would be no inappropriate stacking and location of rooms between units; provide appropriate bin and cycle storage facilities located at ground floor level; ensure the resulting property would provide adequate internal floorspace and headroom for residents (in accordance with the Council's SPD); comprise a property consisting of more than 120sqm of gross floorspace; and ensure sufficient communal space is provided (again in accordance with the Council's SPD).
- 4.6 The Council's SPD advises that planning permission will not normally be granted where the proportion of HMOs (either C4 or Sui Generis) would result in HMOs representing 25% or more of the residential properties within a circle of 50m radius measured from the application site.
- 4.7 However, the explanatory text for policy H8 states that such an assessment is only required for proposals within an area covered within by an Article 4 Direction preventing a change of use from dwellinghouses (C3) to small HMO's (C4) to be undertaken utilising permitted development rights. Additional guidance on this which corresponds with the SPD is provided in the explanatory text for policy H8. Given that the application site is not located within an Article 4 Direction area, such guidance and considerations would not apply and therefore such an assessment is not required in this instance.

- 4.8 The existing property comprises a gross internal floor area of great than 120sqm and is therefore suitable for conversion in accordance with policy H8. Likewise, the resultant HMO would benefit from dedicated bin storage facilities at the front and dedicated cycle storage located at the back. Each room would facilitate the occupancy of a single person, and range between 7 and 14 sqm in size; far in excess of the 6.5sqm minimum requirement. Likewise, kitchen/dining room would be located at ground floor, comprising a total area of 13.6sqm; again far in excess of the 7sqm minimum requirement and no more than 2 floors away from an bedroom within the property.
- 4.9 In addition to the above, a 17.4sqm lounge would be provided at basement level which, given that each bedroom would exceed or substantially exceed the minimum 6.5sqm requirement, and in conjunction with the kitchen/dining room, is considered to be more than sufficient and appropriate for a 7-bedroom HMO.
- 4.10 With respect to floor to ceiling heights, the property benefits from the following headroom measurements:
- Basement – 2m
 - Ground floor – 2.7m (front), 2.6m (rear)
 - First floor – 2.59m (front), 2.38m (rear)
 - Second floor – typically 2.6m, with a minimum of 1.57m at low-level of sloping part of the ceiling
- 4.11 Such ceiling heights are considered to be more than acceptable ensuring appropriate living conditions for future occupants.
- 4.12 Consequently, the proposed HMO would meet all of the requirements for such a conversion as outlined in policy H8 and the Council's SPD, rendering the proposals acceptable in principle.
- 4.13 Notwithstanding the above, it should also be noted that a change of use of the property to a 6-bed HMO, either by way of constituting subsection c) of

Use Class C3 or Use Class C4, would not constitute a material change of use in the first instance or would comprise a change of use benefitting from permitted development rights as outlined within the Town and Country Planning (General Permitted Development) Order 2015 (as amended) in the second instance.

- 4.14 Utilising such a change of use as a viable fall-back position, it is not considered that the change of use to a 7-bed HMO as proposed within the application would result in a materially greater impact in planning terms than that which could be achieved as outlined in paragraph 4.13 above.

Density and Size of Dwellings

- 4.15 The proposals would result in the creation of a 7-bed HMO, thus providing an alternative means of affordable housing for local residents within close proximity to the centre of Reading. All bedrooms would be complete with an en-suite bathroom, with residents sharing a communal kitchen/dining area on the ground floor and lounge at basement level.

Character and Appearance of the Area

- 4.16 The proposals would only involve minor external changes to the existing property, thereby preserving the character of the wider street scene in its current form. Alteration to the front boundary wall and integration of new gates and railing are proposed to facilitate bin storage access, direct from the street.

Residential Amenity

- 4.17 The proposals would not give rise to a material impact upon neighbouring amenity by way of noise and disturbance along what is already a densely populated residential street.
- 4.18 Future residents would benefit from a communal garden to the rear which provides ample space for outdoor recreation and the hanging/drying of clothes etc.

- 4.19 The level of internal accommodation proposed for future occupants is considered to highly generous and in full accordance with the Council's minimum standards, as outlined in greater depth in preceding sections of this statement.

Transport and Parking

- 4.20 The Council's adopted parking standards indicate that a total of 1.75 off-street parking spaces would need to be provided in order to serve the 7-bed HMO.
- 4.21 It should be recognised that the existing property does not benefit from any off-street parking. Furthermore, Paragraph 106 of the NPPF states that:

*Maximum parking standards for residential and non-residential development **should only be set** where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.*

- 4.22 It should be highlighted that the site is located in a highly sustainable location, being situated only a 2-minute walk from commercial centre of Caversham and 1 mile (7-minute cycle ride) from the centre of Reading, including the main train station. Furthermore, various bus stops are located within a short walk of the site along Prospect Street providing regular services to Tilehurst, Purley on Thames, Reading town centre and Peppard Common. Moreover, Reading train station (1 mile to the south) provides regular services to South Wales, Gatwick Airport, Bristol, Newbury, Basingstoke and Central London. It is therefore anticipated that future residents of the property would make good use of local transport links and the proximity of the site to the commercial hearts of Caversham and Reading.

- 4.23 Noting the highly sustainable nature of the site, Para. 106 of the revised NPPF and the viable fall-back position of property being converted to a 6-bed HMO without the need for planning permission; it is not considered that a 'technical deficiency' of off-street parking should preclude the granting of planning permission in this instance.

Cycle provision

- 4.24 Adequate space for cycle storage equivalent to once cycle per bedroom would be provided within the rear garden area in a secure store.

Refuse Provision

- 4.25 Refuse would be located to the front of the property, as previously permitted at 66-68 Prospect Street. 2 x 360L Eurobins are proposed; one general waste and one recycling.

Sustainability/Energy

- 4.26 Paragraph 8 of the NPPF supports the transition of development to a low carbon future. The national Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2010 requires a 25% reduction in carbon emissions over the 2006 standards. This is equivalent to Code level 3 of the Code for Sustainable Homes. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;
- a) The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
 - b) Use of locally sourced, recycled materials and labour where practicable
 - c) Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins.
 - d) Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service

- e) Secure cycle provision to encourage sustainable modes of transport
- f) 'A' rated electrical appliances and energy saving light fittings
- g) 'A' rated double glazed windows with natural cross ventilation provision
- h) Water butts fitted to the rainwater down pipes for watering the garden
- i) Recycling of waste construction materials where practicable

The proposal is therefore considered to comply with sustainability objectives in this respect.

Affordable Housing

- 4.27 Given the nature of the proposals, such development would not be liable to affordable housing provision; either on site or by way of a commuted sum.

Community Infrastructure Levy

- 4.28 The proposals involve a change of use to a 7-bed HMO. It is understood that such development would not be liable for CIL.

Air Quality

- 4.29 The site is located in an air quality area. The effect on occupants is considered to be minimal given there are no external changes to the building and there will be no increase in the number of dwellings. The proposed development will not itself give rise to air pollution such as dust deposition, and accordingly no construction or bespoke operational controls are needed. The proposals do not include any additional parking spaces for cars, but do include much improved and enlarged provision of bicycle stores, thus encouraging transport by foot or bicycle, particularly considering the location with nearby shops, town centre within walking distance and good bus services and train station nearby, we would not expect an increase in car movements due to the development. We understand from conversation with local planning officer that it is unlikely that an air quality assessment is required for a single dwelling but would be please to provide should this be required.

5. Conclusion

- 5.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 5.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 4 of this statement and the supporting plans and documents. It is considered the proposed development would provide an alternative form of affordable housing for the local residents of Reading, without adverse effect on the character of the area, the amenity of neighbouring residents or the safety and convenience of the local highway network.
- 5.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.