

PLANNING, DESIGN AND ACCESS STATEMENT

**Conversion of existing commercial
basement to a 1-bed flat (C3 Use Class)**

**62 Manchester Road, Reading,
Berkshire, RG1 3QN**

On Behalf of: Mr W Hussain

Report Prepared By: Toby Cowell MA (Hons) MSc MRTPI

Emily Temple, BSc (Hons) MSc MRTPI

Contents

1. Introduction	2
2. Site Location and Description	3
3. Planning History	3
4. Development Proposals	3
5. Policy Assessment	5
6. Conclusion	11
7. Appendix 1: Appeal Decision	12
8. Appendix 2: Case officer report	13
9. Appendix 3: Internal Daylight Assessment (T16 Design, Oct. 2019)	14

1. Introduction

- 1.1 This statement is produced to support a planning application for a change of use a basement comprising ancillary storage space in connection with the ground floor retail unit above to a 1-bedroom flat (C3 Use Class).
- 1.2 The application represents a resubmission of a previous application for an almost identical development that was previously refused (ref. 181533) and subsequently dismissed on appeal on the grounds of a lack of information regarding living conditions and outdoor amenity.
- 1.3 The current submission is supported by an updated Daylight Assessment (T16 Design, Oct. 2019), further clarity on the proximity of public open space relative to the application site and the addition of 2 further lightwells to enhance the living environment of the proposed flat.
- 1.4 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.
- 1.5 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 M D Howlett:
 - 1:1250 Site Location Plan
 - 1:100 Existing Floorplans and Elevations – drwg. no. 1065/7
 - 1:200 Proposed Floorplans and Elevations – drwg. no. 1065/8/a
- 1.6 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site comprises an end terrace property of mixed-use situated on the corner of Manchester Road (West) and Liverpool Road (North). The building comprises a ground floor retail unit with associated storage at basement level, with the upper floor levels in residential use. The site is neither located within a conservation area nor comprises a listed building. The surrounding area is dominated by high density late Victorian residential terraced housing.
- 2.2 The site is located approximately 200m North (3-min walk) of Palmer Park on the Eastern side of St. Bartholomews Road, with incorporates public open space, an athletics stadium, bowls club and a children's play area. In addition, the site is also located approximately 0.9 miles (20-min walk) West of Bulmershe Park.

3. Planning History

- 3.1 181533 – Conversion of existing commercial basement to a 1-bed flat (Class C3) – Refused (dismissed on appeal)
- 3.2 180491 – Single-storey basement extension to existing commercial unit - Approved

4. Development Proposals

- 4.1 Regarding the requirements of Circular 01/2006 in respect of Design and Access Statements, the proposal is described as follows:

Use and Amount

- 4.2 The proposed use is for a single 1-bedroom flat.

Layout and Scale

- 4.3 The proposed flat would be located at basement level beneath the existing ground floor commercial unit. No apparent external changes are proposed aside from the addition of 2 lightwells.
- 4.4 Internally, the accommodation has been laid out to maximise the internal space and light afforded, with primary habitable rooms benefitting from lightwells.

Landscaping

- 4.5 New landscaping/planting can be accommodated within the rear courtyard area and is proposed for control via condition.

Appearance

- 4.6 No changes are proposed with respect to the external appearance of the building aside from the addition of two lightwells to serve the living/dining room on the northern side of the building adjacent to the Liverpool Road streetscene.

Access and Parking

- 4.7 No off-street parking is proposed to serve the flat given the lack of on-site space available.
- 4.8 Internally, disabled access and circulation requirements are designed to achieve Building Regulations Part M standards, including entrance doors to be a minimum of 800mm, electrical fittings and service controls at suitable heights for disabled persons use, and all bathrooms and WC facilities designed for disabled access.

5. Policy Assessment

National Guidance

- 5.1 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.
- 5.2 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*".

Principle of Development

- 5.3 The site is located within the wider urban area of Reading where, in accordance with Core Strategy CS14, the principle of additional residential is acceptable. The case officer confirmed for the previous application that no objection was held over the loss of ancillary storage space used in connection with the above ground floor retail unit, that would still allow for the continued successfully operation of the above retail unit. This was not disputed at appeal.

Character and Appearance of the Area

- 5.4 Aside from the addition of 2 lightwells adjacent to the Liverpool Road streetscene to serve the proposed living/dining area, the proposed change of use does not involve any external works to the building over and above that which was previous approved to extend the basement. The case officer confirmed they held no objection to the proposed development from a

design perspective, rendering the proposals in conformity with Core Strategy Policy CS7. This was not disputed at appeal.

Residential Amenity

- 5.5 The primary concerns noted by the Planning Inspector (Appeal Decision included at Appendix 1) in the recent appeal decision related to the lack of information provided in the Daylight Assessment submitted with the appellant's Statement of Case, together with concerns held over the quality of outdoor amenity provided and the lack of information in relation to the location of public open space within close proximity to the site. This section of the statement seeks to address these concerns and highlight how such issues have been satisfactorily overcome.
- 5.6 An amended Daylight Assessment (Appendix 3 - T16 Design, Oct. 2019) has been submitted in support of this application, and noted the addition of 2 further lightwells serving the living/dining area which significantly improve the level of daylight permeating the proposed living space. The addition of the lightwells also significantly improve the outlook from the living/dining areas which was noted as a point of concern by the Planning Inspector.
- 5.7 The Assessment highlights that the Average Daylight Factor (ADF) is the normal method for assessing daylight in newly created dwellings. The targets for room types are defined in British Standard Guidance BS: 8206:2. The results contained within the Assessment provided demonstrates a "snapshot" of the daylight that will be experienced relative to the flat under an overcast sky with a luminance defined by the Commission Internationale de l'Eclairage (CIE) methodology and proscribed by BS: 8206:2. It is therefore not affected by orientation or the time of day or year.
- 5.8 The BRE guidance also defines a method for assessing sunlight availability for new dwellings. However, this is intended for guidance only and represents a "best case" scenario when developments are being planned from scratch (i.e. newly constructed residential developments as opposed

to changes of use). It would be wholly inappropriate to expect a conversion of an existing basement to meet these standards due to the subterranean nature of the proposal, which means that regardless of how large the lightwells were to be, there is little prospect of meeting them. Only windows which face within 90 degrees of South would be assessed for sunlight. In this instance, only the bedroom window faces in this orientation in any case.

- 5.9 The BRE guidance states that sunlight "is viewed as less important in bedrooms", and so in this instance it is not considered appropriate or relevant to include sunlight calculations. The ADF is the most appropriate measure of the amenity of the future occupants of the scheme and the Assessment clearly demonstrates that *the proposed rooms meet and exceed the recommendations of both the BRE guidance and BS: 8206:2.*
- 5.10 To summarise, the proposals have been assessed for internal daylight levels in the habitable rooms at basement level. The design team at T16 Design have endeavoured to provide a solution to lighting the rooms within the constraints of the site, and this has been successfully achieved, as demonstrated by the positive results presented within the submitted Assessment. The assessed rooms meet and exceed the recommendations of BS: 8206:2 and the BRE guidance using the ADF test. This therefore ensures that future occupants will enjoy a well-lit environment, with reduced reliance on artificial lighting. It is therefore the conclusion of the Assessment that the scheme meets guidance levels for daylight, rendering the proposals in accordance with Policy DM4 of the Sites and Detailed Policies Document. This addresses the previous refusal reason and the appeal Inspectors concerns in this regard.
- 5.11 With respect to the private amenity provision proposed in the rear courtyard, it should again be emphasised that this space can be realistically landscaped in order to soften its appearance to provide a functional and attractive space for future occupiers. As is well known within the wider locality, many residential properties do not benefit from any usable private

outdoor amenity space in any shape or form, and therefore the provision of such space as part of the proposed development is a significant benefit and should weigh heavily in favour of the proposed development.

5.12 The appeal Inspector made reference to not knowing which other properties in Reading may not benefit from amenity space, when Council officers will be well aware that almost all apartments in Reading Borough, certainly above ground floor level, do not have access to on site outdoor space, unless communal in some instances. One local example of this is at 377 London Road, where only the ground floor apartment has garden access, and the two upper flats do not. Many more examples can be provided upon request.

5.13 In addition to the above, and in order to provide further clarity with respect to the comments made by the Planning Inspector, the site is located approximately 200m North (3-min walk) of Palmer Park on the Eastern side of St. Bartholomews Road, with incorporates public open space, an athletics stadium, bowls club and a children's play area. In addition, the site is also located approximately 0.9 miles (20-min walk) West of Bulmershe Park. The site therefore benefits from an abundance of public open space within close proximity that adds to the sustainability of the proposed development from an environmental standpoint whilst ensuring future occupiers would be afforded generous degrees of public open space for enjoyment and leisure purposes.

Trees and Landscaping

5.14 Additional landscaping/planting can be introduced into the rear courtyard/amenity area serving the residential unit and is proposed for control via condition.

Transport and Parking

5.15 Due to the lack of available space no off-street parking is proposed for the new residential unit. Whilst it is accepted that a single parking space should

serve the 1-bed flat in accordance with the Council's adopted Parking Standards, the case officer acknowledged for the previous application that unauthorised street parking could be controlled by Traffic Enforcement Officers due to surrounding roads forming part of a wider (Controlled Parking Zone (CPZ). Such development would therefore not amount to 'severe harm' upon the safety and convenience of the local highway network relative to the potential for displaced parking, and the lack of on-site parking did not form a reason for refusing the previous application. Likewise, the lack of identified cycle parking provision within the site did not form part of the reason for refusing the application with the case officer suggesting that the details of such provision could be provided by way of a planning condition (officer report included as Appendix 2). This was not disputed at appeal.

Refuse Provision

- 5.16 Hardstanding would be provided for the location of refuse bins at street level immediately adjacent to the steps leading down to the rear courtyard as shown on drwg. no. 1065/8/A. Further information could be secured via condition.

Drainage

- 5.17 A scheme of surface and foul water drainage would be implemented as part of the change of use of the basement to residential accommodation. The case officer indicated that no such concerns were apparent in this respect and an informative would have been added to the decision notice if planning permission had been granted.

Sustainability/Energy

- 5.18 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) 'A' rated electrical appliances and energy saving light fittings
- f) 'A' rated double glazed windows with natural cross ventilation provision
- g) Recycling of waste construction materials where practicable

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

Affordable Housing

- 5.19 In accordance with the Council's interpretation of the 2016 Court of Appeal Judgement, an affordable housing contribution would not be required in this instance given the proposals comprise a change of use and would result in the creation of a single residential unit; below the 10 unit threshold whereby an affordable housing contribution would be required. This stance was confirmed by the case officer for the previous application and was not disputed at appeal.

Community Infrastructure Levy

- 5.20 Due to the basement having most recently been occupied in 2017 with the proposals amounting to a change of use only, the case officer previously

confirmed that the proposals would not be liable to a CIL charge. The relevant forms have again been submitted in support of the proposals.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute an appropriate windfall site to the Borough's housing supply, without adverse effect on the character of the area whilst providing a high standard of amenity for future occupiers as in part demonstrated by the submitted Daylight Assessment appended to this Statement.
- 6.3 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.

7. Appendix 1: Appeal Decision

8. Appendix 2: Case officer report

9. Appendix 3: Internal Daylight Assessment (T16 Design, Oct. 2019)