

Planning Statement

**2 Connaught Close, Reading,
RG30 2UG**

Prepared For
Kennet Investment Ltd

9304
June 2019



bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 On behalf of our client, Kennet Investment Ltd, we submit this planning statement to support the application for a change of use from residential dwellinghouse (Class C3) to 'larger' House in Multiple Occupation (sui generis) at 2 Connaught Close, Reading, RG30 2UG.

SITE AND SURROUNDINGS

- 1.2 The application site is located at the end of Connaught Close, a cul-de-sac in a residential area of West Reading. The existing site consists of a 2-storey detached property that has been extended in line with permitted development rights (ref: 190108). Planning permission (ref: 180799) has recently been granted for one 3 bedroom dwelling on land within the grounds of this dwelling.

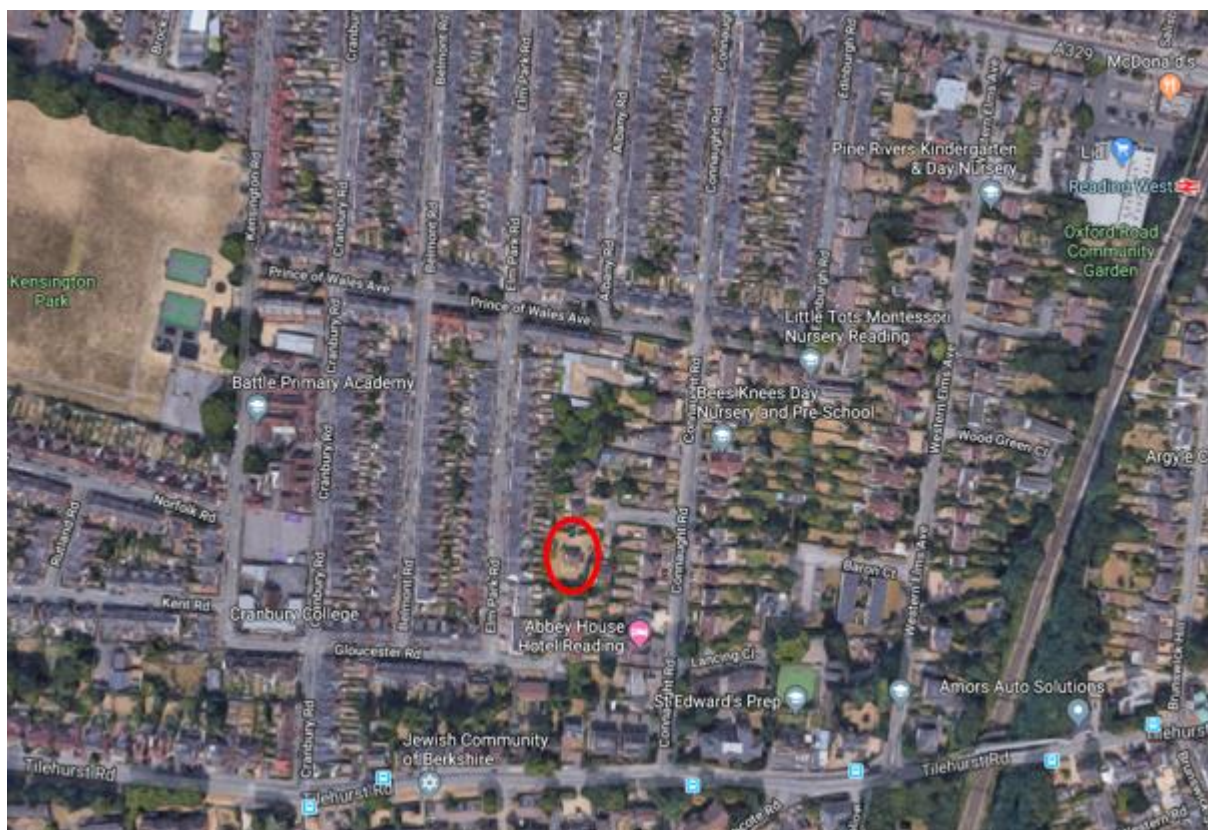


Figure 1 – Aerial image of the site in its surroundings (extract from Google Maps)

- 1.3 The application site is located within the built-up area of Reading and is surrounded by residential properties that vary in size and design. It benefits from good access to a range of services and facilities. This includes areas of public open space, schools and shops. Bus stops



are available on Tilehurst Road approximately 200 metres away and Reading West train station is approximately 800 metres north-east.

- 1.4 The site is not located within a Conservation Area and it is located within Flood Risk Zone 1. The dwellinghouse is not a listed building. The site is not within an Article 4 Direction area. It lies outside of the Air Quality Management Area (AQMA).

SITE HISTORY

- 1.5 A review of the Reading Borough Council online planning register reveals the following planning history:
- 190399 – Discharge of conditions 3, 4, 12 and 15 of application 180799 – conditions discharged May 2019
 - 190108 – Rear extension measuring 8m in depth, with a maximum height of 2.65m, and 2.5m in height to eaves level. Notification of the construction of an extension under class A, Part 1, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 – prior approval not required February 2019
 - 180799 – Construction of one 3 bedroom dwelling – Granted February 2019
 - 171802 – Demolition of existing property and erection of 4 houses (2x3 bed and 2x4 bed) – Refused January 2018

PROPOSAL

- 1.6 The proposal relates to the existing extended dwelling on 2 Connaught Close. The application seeks to achieve planning permission for the change of use from residential dwellinghouse (Class C3) to a 'larger' House in Multiple Occupation (HMO) (sui generis).
- 1.7 The building could accommodate nine bedrooms and would therefore be a large HMO and the proposed use is therefore sui generis.
- 1.8 The house would provide nine bedrooms and bathrooms. A large open plan living/dining area is proposed with a separate kitchen.

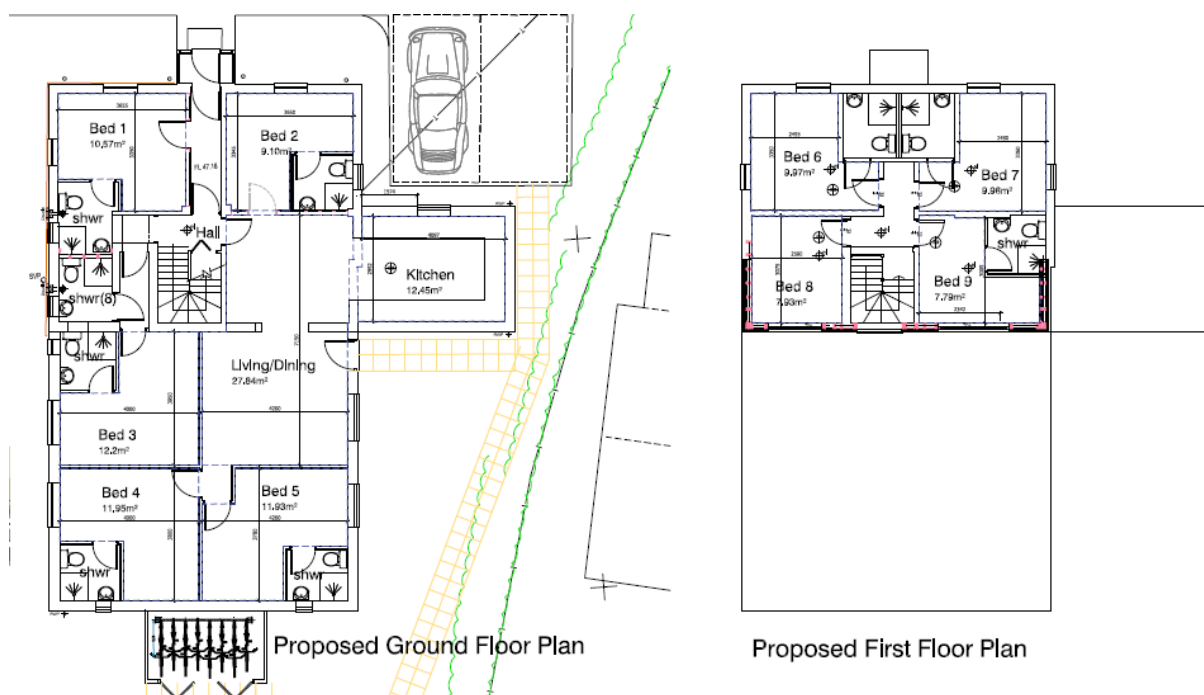


Figure 2 – Proposed layout of the HMO

- 1.9 There would be no external changes to the existing building. There cycle storage is proposed to accommodate eight cycle spaces. Bin storage facilities proposed as per the site plan (ref: CC:150). Private amenity space is provided to the rear of the dwelling. Three car parking spaces would be available for the HMO. Connaught Close is subject to permit holder parking restrictions.
- 1.10 The building has a floor area of 122.89 sqm (external dimensions as at 1 July 1948 or when built), i.e. excluding rear and side extension recently built.



2 PLANNING POLICY

- 2.1 Section 70 of the Town and Country Planning Act 1990 and 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 2.2 In the case of this application, the development plan of relevance comprises:
- Reading Borough Core Strategy (January 2008), and
 - Reading Borough Sites and Detailed Policies Document (2012).
- 2.3 Whilst the Council is currently in the process of preparing an amended local plan, this plan carries little weight at the time of writing, but, nonetheless, doesn't materially alter the test of acceptability.
- 2.4 Material considerations should also be taken into consideration; this includes the National Planning Policy Framework (as amended 2019) and Supplementary Planning Documents and Guidance (SPDs and SPGs) such as the Residential Conversions SPD (2013) and the Revised Parking Standards and Design SPD (2011).

NATIONAL PLANNING POLICY FRAMEWORK

- 2.5 The National Planning Policy Framework (NPPF) (2019) is a material consideration in the determination of the planning application. It places a presumption in favour of sustainable development at the heart of planning decisions, for which there are three dimensions: economic, social and environmental.
- 2.6 For decision-taking the presumption in favour of sustainable development means that Councils are obliged to approve development that accords with the development plan without delay (paragraph 11).

PLANNING CONSIDERATIONS

Principle of Development

- 2.7 Policy CS18 (Residential Conversions) of the Core Strategy sets out that proposals for conversion to HMO 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.

- 2.8 Policy DM8 (Residential Conversions) of the Sites and Detailed Policies Document provides the more detailed policy to CS18. This sets out that proposals to convert properties into HMOs under CS18 will only be acceptable where the different test of the Policy are met. Below we consider each of the criteria in full.
- 2.9 In addition to this, the Residential Conversions Supplementary Planning Document (SPD) (2013) needs to be considered as it sets out a checklist for consideration.
- 2.10 In summary, the policies are supportive of changes of use to HMOs where they will not have an impact on the existing mix of the local community thereby rendering it unsustainable. The Council recognise that HMOs have an important role to play in the housing land supply with the subdivision of large houses providing a valuable supply of reasonably affordable private rented accommodation.
- 2.11 As the site is not located in an Article 4 area permitted development rights set out in Part 3, Class L of the GDPO remain meaning that the change of use from C3 to C4 is acceptable. Consequently, an HMO providing accommodation for between three and six unrelated individuals is acceptable in principle.
- 2.12 The proposal seeks permission for a larger HMO with nine bedrooms being proposed. The consideration for this proposal should therefore be, whether the difference between a 6 person and nine-bedroom HMO is material and if so, is it harmful.
- 2.13 We consider DM8 in detail below looking at each of the criteria in turn.
- *The proposal respects the physical character of the area and additionally would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single-family housing;*
- 2.14 There are two tests here. Firstly, the physical character of the area which is the appearance of the building / site and how it is altered by the proposal and, secondly, the impact of the proposal on the provision of single-family housing.



- 2.15 Prior to the change of use occurring the property would be extended in accordance with the details provided in the prior approval submission (ref: 190108). Other than the construction of this rear extension (which has already happened), no external alterations are proposed.
- 2.16 The second policy test for this criteria is the loss of single-family housing. A change of use can occur between C3 and C4 without the need for planning permission. This would result in the loss of a single-family house. If planning permission is granted for the change of use to a large HMO it doesn't prevent a planning application being submitted in the future to return the property to a single-family house. The change does not have to be a permanent one.
- 2.17 As set out previously, the site is not within an Article 4 area. Article 4 areas have been established where there is a serious threat of HMOs diluting the provision of family housing. Paragraph 5.1 of the Residential Conversions SPD explains that "in wards with higher concentrations of HMOs the complex and often conflicting issues surrounding these properties can at times be keenly felt by residents". The SPD introduces a tipping point for these Article 4 areas where the concentration of HMOs becomes too much and therefore changes the character of the area. Through this site being outside of an Article 4 area, it suggests the introduction of HMOs has not been as prevalent as in the Article 4 areas meaning no artificial (beyond the subjective judgement) threshold needs to be imposed. This should be sufficient to conclude that the change of use is not harmful as it is in an area where the Council hasn't identified the loss of family housing as being critical.
- 2.18 Notwithstanding this, a review of the planning history for the surrounding properties has been undertaken. Further to this we have reviewed the HMO register for Reading Borough Council. This review reveals that there are very few HMOs operating within approximately 50m of the site. This demonstrates how this proposal would not materially alter the character of the area.
- 2.19 In accordance with Checklist 3, Policy DM8 and CS18 it is demonstrated that an appropriate mix of housing remains, the dominant form of dwelling in the vicinity of the application remaining as family housing.
- *There are no unacceptable adverse impacts to other residential properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*



2.20 Policy DM4 stresses that development will not cause a significant detrimental impact to the living environment of existing or new residential 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.

2.21 The proposal would not make any changes to the external elevations of the existing house (and approved extensions). The change of use to HMO would not result in any material increase in overlooking or loss of privacy above the existing situation.

2.22 Due to there being no changes to the elevations of the building there would be no change to the sunlight and daylight available for neighbouring properties. Nor would the house become more visually dominant meaning the change of use would not result in an overbearing development. The requirements set out within Checklist 5 are consequently met.

2.23 Change of use to an HMO would not likely introduce a crime and safety issue into the local area.

2.24 The change from C3 to larger HMO does not mean that the site will start generating a significantly greater amount of noise. Previous applications considered with Reading Borough for schemes of a similar nature make this same conclusion; that it would not be expected that the amount of noise from the property would be significantly different from that generated



from a fully occupied large family house. The change of use would not have a detrimental effect on the existing residents. Policy DM4 is therefore complied with.

2.25 With this planning application we submit an HMO management Plan for all future tenants of the HMO. This sets out the responsibility of the tenants and includes matters such as cleanliness of the house, waste storage and disposal, general maintenance of communal areas (internal and external), car parking, cycle parking, noise and anti-social behaviour.

- *There is appropriate sound insulation between proposed and neighbouring units and layouts avoid inappropriate stacking and location of rooms between units;*

2.26 This requirement is more in terms of conversion to multiple units rather than HMOs and is therefore not relevant to the consideration. The property remains as a single unit.

- *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.*

2.27 As demonstrated by the Site Plan, eight cycle spaces within a secure cycle shed would be provided. This would be located to the rear of the property but be accessible to all. As set out below in paragraph 2.36 the requirements of Checklist 16 would be met. In addition to the long term cycle storage, additional short term parking of bikes could be accommodated within the grounds of the property.

2.28 The bin storage would be to the front of the dwelling and again within a secure area. This would again be accessible to all. As set out below in paragraphs 2.38 to 2.40 the requirements of checklist 17 would be met through the proposed bin storage area.

- *The property to be converted has four or more bedrooms or measures more than 120 square metres gross;*

2.29 The SPD at Checklist 6 re-iterates the policy requirement for “the property to have four or more bedrooms or measure more than 120 square metres gross. When calculating the floor area of the property the measurement should be based on the external dimensions as at 1 July 1948 or when built (whichever is the later)”.

2.30 The property measures around 122 sqm and therefore fulfils this criteria. The property has subsequently been extended and so is of a greater floor area.



- *There is an appropriate balance between communal and private areas for sui generis HMOs.*

2.31 Standards within the SPD suggest that one communal room should be provided for each 4-6 bedrooms. A large living / dining area (around 30sqm) is proposed with a separate kitchen area (around 12sqm). The living / dining area is partially divided by walls meaning it could be argued that three communal rooms are provided for the future residents. This would meet the requirements of the SPD.

Amenity

2.32 Policy DM10 (Private and Communal Outdoor Space) of the Sites and Detailed Policies Document relates to private and communal outdoor space. The policy text appears to be predominantly aimed at new dwellings however the supporting text at paragraph 5.6.6 suggests this may not be the case. It is noted within this supporting text that conversions only have the existing level of space to work with. At paragraph 5.6.10 it sets out the amount of external space required for flats outside Reading centre. There is no guidance for HMOs. The application property has a good-sized garden which would provide around 150sqm of usable outside amenity space. The amenity space is private and to the rear of the property. It is well screened so would be attractive to the future residents as there would be appropriate space for sitting-out, drying clothes etc. This outdoor space would be of an appropriate level thereby meeting the requirements of Checklist 4.

2.33 When considering the amenity for future residents of the HMO, all bedrooms have an external window meaning appropriate levels of light and ventilation would be experienced by the residents. The outlook from these windows would all be acceptable. This meets Checklist 10 of the SPD.

There would be no shared bathrooms within the property, each bedroom would have use of their own dedicated bathroom meaning that there would be no amenity impact on other HMO residents.

Parking and Transport Issues

2.34 There is a parking permit scheme in force in the area. The site is located within Zone 2, Primary Core Area, of the Revised Parking Standards Supplementary Planning Document (SPD). The



parking standard would require one parking space per 4 rooms (0.25 per room) and therefore requiring the property to have 2.25 car parking spaces.

- 2.35 Policy CS24 (Car/Cycle Parking) of the Core Strategy sets out that maximum car parking standards and cycle parking requirements will be applied. DM12 (Access, Traffic and Highway-related matters) of the Sites and Detailed Policies Document seeks to ensure that proposed development will not result in a highway safety issue, result in congestion and have an impact upon the environment.
- 2.36 The proposal will be able to provide 3 spaces. This meets the policy test and checklist 13.
- 2.37 It is noted that because the site is within a parking permit scheme area the future residents will not be entitled to on-street parking permits as set out in checklist 14. Due to the sustainable location of the site (i.e. proximity to train station, bus stops and within walking distances of a broad range of amenities) this would not be an issue for future residents.
- 2.38 It is demonstrated that cycle parking for eight bikes can be accommodated within the site, to the rear of the house. The cycle shed would be secure, covered and lockable. This would meet the requirements of checklist 16. Further to this short-term cycle parking could be accommodated within the rear amenity space.
- 2.39 The proposed development would not have a material detrimental impact on the functioning of the transport network nor would it have a detrimental impact to the safety of users of the transport network. The policy requirements can be met.

Bin Storage

- 2.40 Space for waste bins is accommodated to the front of the site. This will ensure waste collection is efficient thereby minimising the amount of time service vehicles are stationary on the highway. The site is located at the end of a cul-de-sac and therefore the collection of waste bins is unlikely to have an impact on the safe operation of the highway.
- 2.41 The bins would be located within a store meaning they would be visually screened. As a result, they would not have a visual impact. The requirements of checklist 17 are therefore met.



3 CONCLUSIONS

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The proposed development has been carefully considered in the context of all the relevant policy requirements.
- 3.2 The proposal meets policy requirements with regard to the conversion of houses to flats and garages. I.e. the size of the property meets standards and there is an appropriate number of communal rooms provided for the size of the HMO. A new HMO in this location would not materially alter the character of the area because, as demonstrated the predominate housing type remains as family housing. The amenity for future and existing residents has been demonstrated as being acceptable.
- 3.3 The application complies with all the development plan guidance requirements. As explained in paragraph 9 of the NPPF, “Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”. In other words, if the proposed development complies with the local plan, it must be considered as *sustainable development* complying with the environmental, economic and social tests of paragraph 8. Paragraph 11 then advises that decisions should apply a presumption in favour of sustainable development and explains what this means by advising that Local Planning Authorities should be “approving development proposals that accord with an up-to-date development plan without delay”.