

PLANNING STATEMENT

IN SUPPORT OF FULL APPLICATION FOR THE CHANGE OF USE OF
A FORMER GUEST HOUSE (C1)
TO A 9-BEDROOM HOUSE IN MULTIPLE OCCUPATION (SUI GENERIS),
INCLUDING A SINGLE STOREY REAR EXTENSION



**BRIDGE LODGE
152 CAVERSHAM ROAD
READING, BERKSHIRE
RG1 8AZ**

SITE DESCRIPTION

The property is a substantially sized terraced former guest house (C1) which is set over three storeys. To the front a terraced area can be found, facing onto Caversham Road, whilst to the rear, a large parking area can be found, which is capable of accommodatijng 4 cars. This is accessed via an alleyway located along Thames Avenue, serving a number of other hotels, residential dwellings and apartments located along Caversham Road. Overall, whilst the property is in good condition, it is in need of full refurbishment throughout.

The property is in a highly sustainable location within a predominantly residential area, although there are a number of other uses within the street, including hotels, apartments, takeaways, shops, services and offices. Further afield, Reading city centre can be found, providing access to a range of shops, services, facilities and opportunities for employment. The property is within easy walking access of various shops and services within the primary retail core and wider town centre area. In addition, Reading train station is within a 12 minute walk of the front door, whilst the closest bus stop is within 1 minutes' walk away.

PROPOSAL

The proposal seeks planning permission for the change of use of this former guest house (C1) to a 9-bedroom House in Multiple Occupation (Sui Generis), including a single-story rear extension to the rear to provide additional high-quality accommodation and communal living space for a maximum of 9 young professionals and key workers only.

The purpose is to offer high quality, affordable shared accommodation to working professional people who want to live and work within Reading, but are unable to afford to buy a place of their own at present, such as key workers, graduates, local workers and those on secondment with their employment (NB – Not students).

The building will be refurbished to a very high standard by a reputable building firm. The alterations will include internal refurbishment and a small extension to the rear. The existing access to the front and rear of the property will be maintained. The alterations can clearly be seen on the attached floor plans.

USE CLASS CHANGE FROM C3

Whether, by definition of being a 9-bedroom HMO, this application falls into the 'sui generis' class as opposed to the C4 use class, is dependent on whether it is considered that the land use has been 'materially altered' as a result of the increase above 6 beds. Some Appeals considered at other councils have taken the view that it does not, but each case of course has to be judged on its own merits, as a matter of fact & degree. (Ref: APP/D1780/C/04/1162748 & APP/Y0435/A/07/20550499).

RELEVANT HISTORY AND CONSULTATION

The applicant has spoken with officers of Reading Borough Council on several occasions to gain a clear understanding of the required standards for properties of this kind and will fully complied with all requirements.

The applicant previous applied for pre-application advice (reference no. 190274), which concluded that it is unlikely that the change of use to a HMO would be resisted in principle because of the site specific circumstances, namely the prevailing character of the immediate area and the fact that this particular conversion would not result in the loss of an existing family dwelling. As such, the applicant felt encouraged by this positive response to apply for the change of use of the guest house into a 9-bedroom HMO.

THE APPLICANT

The applicant is a member of the National Landlord's Association and is a Franchise Member of a large national organisation (Platinum Property Partners (PPP)), which is committed to meeting local housing need by providing high quality shared accommodation for local professionals and key workers. Further information about PPP can be found in the accompanying Platinum Rooms Brochure. The applicant will actively manage the property in a professional manner.

QUALITY OF ACCOMMODATION

The property will be renovated to an extremely high standard which will maintain the national profile of PPP. Examples of other PPP accommodation are provided in the photographs in the attached brochure.

Sustainability is important to the applicant, and energy efficient appliances including a washing machine, tumble drier, microwave, dishwasher, refrigerator and freezer will be provided. High-speed broadband and Freeview television will also be provided with individual ports in each bedroom.

The applicant will employ professional cleaners to maintain the property on a weekly basis and will use the services of a gardener for external upkeep.

TENANTS

The applicant is committed to ensuring that the new use of the property does not have an adverse impact upon the amenity of the surrounding neighbours. The applicant carefully screens prospective tenants, using background, employment and credit references. If an applicant is from outside the country an identity check will also be included to validate their legal status in the country.

In many areas there is great concern about the effect HMO's have on the local community, this can be caused by density of that type of housing, noise and anti-social behaviour from tenants.

The applicant believes that this is caused by the choice and standard of property. By providing a high-quality residence aimed at working professionals this problem would not exist.

Additionally, the applicant would manage the property in the following ways to ensure that any issues affecting the other tenants, neighbours or the larger community will be dealt with immediately:

- each tenant will be vetted

- the applicant will liaise with neighbours who will be given contact telephone numbers of the applicant. The applicant will visit the property once a week to check on communal areas
- quarterly inspections of all bedrooms will take place to ensure the highest standards are maintained
- both the weekly cleaner and gardener will also monitor and report any concerns to the applicant.

Whilst it is not applicable to this type of property the applicant endorses the Government's 'Respect Standard for Housing Management'.

PLANNING POLICY AND MATERIAL CONSIDERATIONS

The proposal fully complies with the policies contained in Reading Borough Council's Local Plan. In order to support this proposal, the applicant has drawn on a wide range of other reference material, including the following:

- Core Strategy (2015)
- Sites and Detailed Policies (2015)
- Revised Parking Standards and Design SPD (2011)
- Residential Conversions SPD (2013)
- Sustainable Design and Construction SPD (2011)
- Strategic Housing Market Assessment (2016)
- Strategic Flood Risk Assessment (2017)
- National Planning Policy Framework (2019)
- DCLG 'Residential Car Parking Research'

RELEVANT PLANNING POLICIES AND GUIDANCE

HOUSING

Core Strategy (2015)

Policy CS15: Location, Accessibility, Density and Housing Mix

By converting a former guest house into a 9-bedroom HMO, the applicant is providing an appropriate use for the building and in doing so, is helping to contribute to the mix of uses in the area which the building is located. This is because there are a number of other hotels, guest houses and serviced apartments nearby, as well as office blocks, takeaways and residential properties. Using the property as an HMO also secures the long-term future of a large existing building in a sustainable and accessible location, within walking distance of Reading's town centre, bus stops, train stations and opportunities for nearby employment.

The amenities of adjoining occupiers will not be impacted in any way by the extension because of its layout, orientation and massing, which has been carefully design to provide a high-quality design, in-keeping with the level and scale of development in the surrounding area. The pre-application statement acknowledges that modest single-storey rear extensions do not often generate significant levels of harm on the character of the original property or the surrounding area. Additionally, it will be constructed using sustainable practices.

Policy CS18: Residential Conversions

Due to the high-quality nature of the proposed conversion into a 9-bedroom HMO, the applicant is confident that there will be no loss of amenities or change to the character of the area. Additionally, there will be no loss of an existing family dwelling. This is because the building was formally used as a guest house and would therefore have created much activity, noise and disturbance. However, by using the property as an HMO, there will be a reduction in the amount of activity, noise and disturbance produced because less people will be coming and going and tenants will be on 6-month minimum AST agreements, meaning the number of people associated with the property will dramatically decrease. The pre-application advice statement acknowledges this and states that it is unlikely that the level of noise generated from an HMO would be significantly different to the existing permitted use of the property as a guesthouse.

In addition, there will be no loss of privacy and no loss of external amenity space due to the extensive depth of site to the rear. The extension will be constructed so it is level with the rear wall of the adjoining neighbouring property, which will provide a more uniform 'look' to

the back of the buildings, without impacting on the amount of on-site parking or refuse storage provisions.

Policy CS35: Flooding

The front of the building is located within Flood Zone 2, whilst to the rear of the building, this is located in Flood Zone 3. Further to pre-application advice, the applicant has had a Flood Risk Assessment (FRA) conducted, which has been submitted with this application. It concludes that there is not a risk to residents as a result of this proposal.

Sites and Detailed Policies Document (2015)

Policy DM4: Safeguarding Amenity

The use of the building as a Sui Generis HMO will not have a detrimental impact on the property or on neighbours in any way due to the high-quality nature of the refurbishment works proposed and the professionalism of the applicant, as well as the type of tenants who will be allowed to live in the HMO. This will ensure that noise and disturbance generated by occupants will not become a nuisance to adjoining occupiers.

Due to the spacious layout of the existing property and the proposed rear extension, there will be no issues related to privacy or overlooking and the proposed extension will not lead to a loss of sunlight or daylight, due to its proportionate scale and massing. There will be no detrimental effects related to the proposed layout of bedrooms, given the former use of the building. Additionally, opportunities for crime and anti-social behaviour will be reduced through the use of the property as an HMO because the transient nature of occupants will be reduced from that of the guest house, given that tenants will be on 6-month minimum AST agreements.

Policy DM8: Residential Conversions

The proposed conversion of a former guest house into a 9-bedroom HMO will fully respect the physical character of the area, without harming the existing mix of uses in the neighbourhood. The works to extend will be sympathetic to the host building and will be of a similar scale to those erected in the immediate area, ensuring the property will remain in-keeping with its surroundings. As the property was not used as a single-family dwelling,

there will be no loss of a single-family house. Instead the long term use of the building will be secured.

Due to the type of accommodation the applicant is seeking to provide, there will be no unacceptable impacts to other residential properties arising from noise and disturbance because the activity associated with the building will reduce as there will be less people coming and going as an HMO than as a guest house. Furthermore, the adjoining buildings are used as hotels and guest houses. As such, the applicant plans to install appropriate sound proofing throughout during refurbishment to ensure that noise and disturbance does not interrupt the tenant's enjoyment of the property and vice-versa.

Refuse and recycling provisions and secure bicycle storage areas will be provided to the rear of the property. The applicant is confident that the amount of refuse material produced by the new use of the property will not be significantly different to the amount produced by using the property as a guest house.

In addition, the property to be converted already has more than 4 bedrooms and is over 120 m² gross and the applicant is providing a large communal area to the rear of the building within the proposed rear extension. This will provide an excellent space for tenants to make use of and enjoy as well as having their own large and spacious private bedrooms.

Policy DM10: Private and Communal Outdoor Space

The new use of the property will provide a large communal outdoor space for tenants to make use of and enjoy at the rear of the building. This is because the space at the rear of the building is suitably large enough to accommodate off-road car parking for 4 cars, secure and covered bicycle storage and refuse storage provisions without compromising on the outdoor space available, given the depth of the plot. There will be no detrimental effects related to the loss of privacy, overlooking or overshadowing.

The space will be accessible to all tenants of the property via a door from the communal kitchen/diner. The outdoor area respects the size and character of other similar spaces in

the neighbourhood, being that the common use of buildings in the area are as guest houses, service apartments and hotels.

Residential Conversions SPD (2013)

Checklist 1

The proposed single storey rear extension has been designed so that it fits in well with the character and built form of the surrounding area. Its scale and massing are proposed to blend in with the host building as well as with the adjoining neighbouring buildings on either side. The depth of the extension will bring it in line with the rear wall of both adjoining properties, creating a more uniform look to the rear of the dwellings without being seen as dominant or overbearing.

All materials to be used in the construction of the extension will be matched closely with those used in the main building to ensure continuity.

Checklist 2

The rear extension, replacing an existing bedroom and a laundry room and creating a large kitchen and bedroom with ensuite facilities in its place will improve the amenities for existing and new occupiers of the property, without impacting adversely on the character of the existing building or the outdoor amenity space available to tenants, due to the large rear garden space available behind the former guest house.

Checklist 3

The conversion of a former guest house (C1) into a 9-bedroom HMO will help to contribute to the achievement of a mixed and sustainable community, without having a detrimental impact on the physical character of the area. This is because the character of the area is predominantly already occupied by HMO properties as well as by other hotels, guest houses and serviced apartments. From the pre-application advice received, it states that:

“Given the transient nature of this specific section of Caversham Road and including existing high proportion non-residential uses found within the search radius (including a large number

of hotels and guest house), it is considered that the proposal would not have a significantly detrimental impact on the existing character or composition of the immediate area.”

Checklist 5

The use of the building as an HMO will not see issues related to loss of amenity, an increase in noise and disturbance or an increase of crime and anti-social behaviour because with a maximum of 9 tenants living in the property with a minimum of 6 month AST agreements, there will be a decrease in the activity of people coming and going and cars manoeuvring on the site. As such, noise and disturbance are likely to be reduced, particularly as the tenants will be vetted thoroughly prior to occupation and will be young working professionals only. Additionally, opportunities for crime will be reduced as well due to an increase in permanent natural surveillance.

Privacy and overlooking will not be impacted upon as the layout of the property is remaining much the same, except for the erection of a single storey rear extension, which will not affect the daylight and sunlight received by adjoining buildings or be visually dominant in terms of scale.

Checklist 6

The former guest house is easily in excess of 120 m² gross and has a sufficient number of bedrooms for the intended occupancy, as demonstrated by the existing and proposed floorplans submitted with this application.

Checklist 7

As shown in the submitted floorplans, all minimum internal floorspace standards will be fully complied with for bedroom sizes, communal areas and facilities to ensure that an HMO of high-quality is set up.

Checklist 8

As part of the refurbishment works, the property will be appropriately sound proofed to ensure that all bedrooms and communal areas are finished to the expected standards and do not result in noise and disturbance travelling to adjoining buildings, or within the building

itself which could cause a nuisance to tenants or occupiers of the neighbouring buildings. As such, all work will be signed off correctly by building control prior to occupation.

Checklist 9

Due to the proposed layout of the property, the applicant is able to ensure that all but one of the bedrooms are stacked one on top of the other and that the kitchen and communal space is set away from sleeping accommodation, except for bedroom 1. However, this will be appropriately sound proofed to ensure that the occupant of bedroom 1 is not disturbed by the communal areas.

Checklist 10

All proposed bedrooms windows in the property will benefit from having an external window, allowing natural light and ventilation to enter the building. Additionally, the kitchen and dining area will also benefit from two external windows.

Checklist 25

The applicant is providing a large communal space of 24.64 m² which should be regarded as acceptable to the Council for the intended number of occupants in the property.

The Local Plan makes reference to the aim of encouraging a supply of high-quality affordable housing. The applicant believes they have already demonstrated the superior nature the accommodation they are offering, but also how affordable this type of accommodation will be with all-inclusive room rents. The applicant also believes that by offering this type of accommodation, they are enhancing the choice for local tenants and assist with achieving balanced communities and supporting the local economy.

The applicant is confident that the change of use will not have a negative impact on neighbourhood amenity. The property will not contain more residents than a large family and all tenants will be vetted prior to their tenancy beginning. The Tenancy Agreement will also have stipulations in relation to respect for neighbours with particular regard for parking and noise. There will be regular inspections to ensure the property is maintaining the highest standards and cleaned weekly.

National Planning Policy Framework

The proposal fully accords with the objectives of the recently adopted National Planning Policy Framework (NPPF). This states that local authorities need to deliver ‘a wide choice of high-quality homes’ and ‘create sustainable, inclusive and mixed communities.’ This application will improve the mix of community in this family area ensuring a more sustainable and balanced community.

The proposal can also be seen to comply with another key policy set out in the NPPF – the need to encourage effective use of land by reusing land that has previously been developed. By converting a large existing house, much needed accommodation has been provided without new development in an affordable manner.

Key workers

This HMO will also help address the need for key worker accommodation. There is an identified need nationally for housing for key workers to enable our core facilities to operate properly. An HMO for young professionals such as this provides an affordable option for key workers to live near their place of work in high quality accommodation. Across the 159 franchise partners, 26.6% of tenants are key workers as defined on the Direct.gov.uk website, showing that this type of accommodation is proven to meet this need.

Change to Local Housing Allowance

From January 2012 the way LHA is allocated changed and single people under 35 are required to stay in shared accommodation. This will in the future have an impact on what type of private rented accommodation is required. This will mean that there will be an increased need for houses in multiple occupation and although this HMO will not house recipients of LHA it will push tenants looking for this type of accommodation up the ladder and more HMOs of all quality levels, including this at the very highest, will be required.

TRANSPORT AND PARKING

Core Strategy (2015)

Policy CS24: Car/Cycle Parking

It is recognised that given the former use of the building as a guest house, there is an overprovision of car parking spaces to the rear. As such, the applicant is providing 4 number of off-road car parking spaces which is in accordance with the adopted parking standards. The remaining space will be utilised as outdoor amenity space for tenants of the property to make use of and enjoy.

Furthermore, secure and covered bicycle storage will be provided on site, ensuring that cars are not needed for tenants to get around, especially as the town centre is located a short walk or bicycle journey away.

Sites and Detailed Policies Document (2015)

Policy DM12: Access, Traffic and Highway-Related Matters

With the change of use of the guest house into a 9-bedroom Sui Generis HMO, there will be no adverse impact on highways safety or the functioning of the transport network. This is because the number of cars that will be associated with the use of the building as an HMO will be reduced, in comparison with the use as a former guest house due to the accessible location of the building in relation to public transport provisions and the town centre for employment and leisure opportunities, as well as the applicant providing 4 car parking spaces, in compliance with the standards contained in the 'Revised Parking Standards and Design' SPD.

Additionally, with a maximum of 9 tenants on minimum 6-month AST agreements, there will be less activity associated with the building, whereas the former guest house would have seen multiple people arriving and departing on a daily basis, often using private vehicles to get to their destination. As such, it is likely there will be a significant decrease in the use of the existing site access from Thames Avenue, resulting in increased safety for pedestrians, cyclists and other users of the highway in the immediate vicinity.

Residential Conversions SPD (2013)

Checklist 4

Due to the site's former use as a guest house and the available parking provisions to the rear of the building, the new use as an HMO will be able to provide adequate private outdoor space for the intended number of occupiers, even with the addition of a single storey rear extension due to the extensive length of the plot.

Checklist 13

The parking provisions to the rear of the property are more than adequate for the number of intended occupants, with 4 number of spaces available. The proposal for a 9-bedroom HMO would require the provision of 2 spaces and so by having 4 spaces, the applicant is complying with the adopted parking standards contained within the 'Revised Parking Standards and Design' SPD (2011), which states that HMOs located within Zone 2 should provide 0.25 spaces per bedroom.

Checklist 16

The applicant plans to provide secure and covered bicycle storage for a minimum of 9 bicycles, located to the rear of the building in a convenient position. These provisions will ensure that tenants can get around without having to rely on the use of a private car, particularly given the sustainable and accessible location of the building.

Local Policies on Transport

The property is also within convenient access of green modes of transport that provide linkages with the Town Centre and other places of interest. In recognition of this within the property, maps will be displayed on the house notice board to inform tenants of the location of cycle, pedestrian and public transport facilities, together with local bus and rail timetables. The applicant will draw this information to the attention of new tenants to promote the use of green modes of transport.

A previous appeal, APP/E3525/W/15/3005163, which granted permission for a 7-bed HMO for Platinum Property Partners supports the applicant's approach to providing on-site parking as the Inspector found that potential occupiers would know the amount of parking available either on site or within the area, and if for the prospective tenant parking provision was an

important consideration this would impact upon the attractiveness of that property as a home.

National Planning Policy Framework

The NPPF states that transport policies have an important role to play in facilitating sustainable development and developments should be designed so journey times are minimised.

This site is situated in a very sustainable and accessible location, within walking distance of local shops and bus stops, whilst the train station and town centre are within easy walking distance, enabling tenants of the building to access places of employment or for leisure activities without the need to rely on a private car.

DCLG Residential Car Parking Research

Platinum Property Partners has undertaken a survey of the car ownership of all tenants across the group's property portfolio members in the UK. This has established that only 58.18% of all the tenants use cars, even though 100% are in employment and 83.12% work within 5 miles of the properties they rent. This is largely due to the sustainable locations that are chosen for the PPP properties, in addition to the personal circumstances of the tenants. This supports research by the government. The report entitled "Residential Car Parking Research" published by the Department for Communities and Local Government (May 2007) states that "Tenure is another influence on household car ownership. In particular households occupying rented accommodation can have up to 0.5 fewer cars than owner occupied households in dwellings of similar size and type.

SUSTAINABILITY

Core Strategy (2015)

Policy CS1: Sustainable Construction and Design

The applicant's proposal accords fully with the aims of this policy because through the refurbishment of the existing guest house, the building will be thoroughly upgraded, including rewiring, replumbing and installing energy efficient appliances throughout, such as a new boiler, and upgrading the thermal efficiency of the building through the installation of

appropriate sound and thermal insulation, as well as replacing older windows, where practicable, with more thermally efficient windows. These will be matched closely with those used in the host dwelling to ensure continuity.

As for the proposed single storey rear extension, this will be constructed using sustainable development practices and a policy of reusing and recycling all materials, where possible, will be in effect on site to reduce waste materials produced by the works. Being a new structure, the extension will be built with sustainable design principles in mind to future proof the structure in terms of its thermal and energy efficiency.

Policy CS2: Waste Minimisation

As mentioned above, there will be a policy of reusing and recycling, where practicable, all materials used in the removal of the existing structure and its replacement with a single storey rear extension. For those materials which cannot be reused, they will be recycled and for materials which cannot be recycled, they will be disposed of in a responsible manner.

The use of the building as an HMO is not expected to generate increased amounts of refuse or recycling. This is because with a maximum of 9 tenants in the property, the proposed use will be less intensive than the former use of the building as a guest house, where multiple occupants would have stayed at the property on a daily basis. Furthermore, the design of the extension will provide more than adequate space for the storage of refuse and recycling to the rear of the building.

National Planning Policy Framework

The applicant supports the Government's drive for sustainable development and this change of use will improve the sustainability of the wider community and of the property itself through the use of energy efficient appliances.

SECURITY

Secure by Design and Crime Prevention Through Environmental Design

The official UK Police initiative states that 'maintenance standards send powerful signals that undoubtedly influence people's behaviour. Sufficient resources must be made available to

adequately maintain buildings and communal spaces'. The applicant employs a regular cleaner, gardener and window cleaner, monitors waste disposal and is committed to external maintenance to contribute to the street scene.

The layout of the property and number of tenants will also increase natural surveillance in the area as described in Crime Prevention Through Environment Design.

REFUSE MANAGEMENT

Residential Conversions SPD (2013)

Checklist 17

Suitable refuse storage provisions are already in place at the building, due to its former use as a guest house. With a maximum of 9 tenants living in the property, the amount of refuse and recycling materials produced will be similar to, if not lower than the previous use of the property as a guest house.

Furthermore, the pre-application statement indicates that it is unlikely the refuse requirements of an HMO will be greater than the current use. As such, the applicant is confident that the existing refuse provisions will be more than adequate for the proposed new use.

SUMMARY AND CONCLUSIONS

When announcing the changes to HMO planning legislation in June 2010, Housing Minister Grant Shapps stated "Shared homes ensure people who want to live and work in towns and cities can do so, and are vital to the economy". The applicants and PPP are committed to providing high quality shared accommodation for professionals, enabling them to live and work in towns of their choice. He also stated "These changes will safeguard the supply of shared housing where it is needed without burdening landlords with cumbersome red tape - but will also hand councils the flexibility they need to tackle problems where they occur". The applicants and PPP applaud raising the standards of the private rented sector and are committed to contributing to sustainable development and meeting a growing housing need.

It has been demonstrated that this conversion to a 9-bedroom HMO will fully comply with policies within the Local Plan. The applicant believes that the proposed use of the building as an HMO would be a very appropriate use as the applicant is committed to providing a well-run, well-maintained HMO. The applicant in particular makes the following points:

- the proposed change of use would provide much needed safe, high quality accommodation for working professionals
- it would meet a recognised housing need in a sustainable location
- the proposed use would be in keeping with the residential character of the surrounding area
- it would assist in creating a suitable housing mix (in accordance with the aims of national planning guidance).

The applicant believes that by providing an HMO of this high standard, they are complying with the aims of the legislation introduced in April 2010 and setting a standard which will reflect present and future local policies.

Notwithstanding the information above and in the rest of this application, the applicants would welcome any advice the Planning Department can give and will endeavour to satisfy any other planning criteria for change of use approval.