

PLANNING DESIGN AND ACCESS, AND HERITAGE STATEMENT

**Change of use from small HMO (C4) to
7-bed HMO (Sui Generis) facilitated by
a hip-to-gable roof enlargement and
rear dormer, front rooflights, and
erection of single storey rear extension**

18 Goldsmid Road, Reading, RG1 7YB

On Behalf of: Mr M Ashworth

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1.0 Introduction

- 1.1 This statement is produced to support a planning application for a change of use from a 6 bed small HMO (C4) to a 7-bed HMO (Sui Generis) facilitated by a hip to gable roof enlargement and rear dormer, and single storey rear extension.
- 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 Zoe Lewis Architects Ltd:
- 1:1250 Site Location Plan
 - 1:500 Existing Block Plan
 - 1:100 Existing elevations and floor plans
 - 1:100 Proposed elevations and floor plans
- 1.4 The relevant application fee of £462 will be submitted by the applicant separately.

2.0 Site location and description

- 2.1 The application site comprises a detached dwellinghouse, currently on the process of being converted for use as a lawful small HMO (Use Class C4), on the northern side of Goldsmid Road within the settlement boundary of Reading and Russell Street/Castle Hill Conservation Area. The site also forms 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 wider locality is primarily residential in nature and is sited to the rear of a row of terraced properties dating to the early 19th Century; a number of which are listed. Directly in front of the application site on the opposite side of the road lies a Grade II listed Jewish Synagogue dating from 1900 (a well-articulated building utilising red brick with Bath stone dressings); indicated as constituting the finest religious building in the Conservation Area and one of the focal points in the area. The northern side of Goldsmid Road and parts of Franklin Street however comprise a significant proportion of more modern residential properties consisting of both dwellinghouses and apartments which vary widely in character and vernacular.

3.0 Planning History

- 3.1 181540 - Single storey side and rear extensions - Approved

4. Planning 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 proposal is for the change of use of the property from a 6 bed small C4 HMO to 7 bed HMO (Sui Generis), facilitated by a hip-gable roof enlargement, rear dormer window, front rooflights and a single storey rear extension.

Layout and Scale

- 4.3 The proposed rear extension is currently under construction following approval under application 181540. The proposed roof changes do not change the footprint or existing ridge height of the property.

Landscaping

- 4.4 No landscaping is affected by the proposed roof proposals, and the rear extension is already approved.

Appearance

- 4.5 The proposed property would change from a hipped roof to a gable roof. The materials used in all proposed extension will match the host dwelling.

Access and Parking

- 4.6 No change is proposed to the existing access and parking.

5.0 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 application site is located within the settlement boundary of Reading with the property in question already in HMO residential use. The principle of development, namely the change of use from a small 6 bed HMO (C4) to a large, 7-bed HMO (Sui Generis), is therefore considered to be acceptable provided such a change of use is in accordance with local policies CS18 and DM8 and the Council's Residential Conversions Supplementary Planning Document (SPD).
- 5.4 Policy CS18 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.
- 5.5 Policy DM8 adds further amplification to CS18 by stating that such proposals should, amongst other things: respect the physical character of the area and not result in a significant loss of single-family housing; not unduly impact the amenities of neighbouring properties with regards to noise and disturbance; ensure bin and cycle storage is of an appropriate size and standard for the units proposed. Furthermore, the property should consist of 4 or more bedrooms (or measures more than 120sqm gross external floorspace) with an appropriate balance being struck between communal and provide amenity areas. The property measures 120m² floor area and as such is acceptable in this respect. The use of the property as an existing C4 HMO in accordance with the maximum threshold identified within Use Class C4 of the Town and Country Planning (Use Class Order) 1987 (as

amended), without constituting a material change of use, means there is no loss of family housing occurring as a result of the proposed additional bedroom. Consequently, change of use of the property from a small to large HMO (C4 to Sui Generis use) within the centre of Reading would not materially dilute or harm the balance of housing within the centre of Reading, and the proposals are therefore considered to be acceptable in this respect.

- 5.6 The SPD also advises that residential accommodation should have a 'good practice' floor to ceiling height of 2.15m. This standard will be applied to the principal rooms of accommodation, which include kitchens, bathrooms and living rooms. No reference is made to bedrooms however. This minimum requirement would be substantially exceeded for the principal accommodation at ground floor, and also marginally exceeded for bedrooms 4 – 6 on the first floor (although not a mandatory requirement). Part of the bedroom accommodation totalling 8.1m² within the proposed loft conversion would also achieve this at 2.2m. The proposed floor area at this height (the area formed by the dormer and central band of the loft) is considered to cover enough of the bedroom floor area to be appropriate.
- 5.7 Whilst it is acknowledged that a portion of the headroom within the proposed attic space serving bedroom 7 would be below 1.5m and therefore not constitute 'usable space' (as referenced within the Council's 'Guide to Amenity Standards applicable to Houses in Multiple Occupation' document); the 'useable' floorspace of bedroom with a headroom greater than 1.5m is 17.3m², and at a height of 1.8m the total area is 12.1m², which significantly exceeds the single bedroom minimum floor area of 6.5sqm as set out in the SPD and the HMO Management Pack Sept 2018 published by Reading Borough Council.

- 5.8 With the 6 bedroom (small HMO) 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 to the amenity of the surrounding area in planning terms than that which could be achieved at the property under the fallback 6 person (small HMO) permitted development use.

Density and Size of Dwellings

- 5.9 The proposals would result in the creation of a 7-bed HMO, thus providing an increased number of an alternative means of affordable housing for local residents within the centre of Reading. All bedrooms would be complete with an en-suite bathroom, with residents sharing a large 25sqm communal kitchen/living/dining area on the ground floor, which exceeds the requirements of the SPD and HMO Management Pack Sept 2018.

Character and Appearance of the Conservation Area and setting of the Listed Building

- 5.10 The proposed rear extension is extant and currently under construction, having been previously approved under application 181540. This aspect is therefore considered to preserve the character and appearance of the Conservation Area.
- 5.11 The proposed front rooflights are modest and flush with the roofslope such that they would also preserve the character and appearance of the Conservation Area.
- 5.12 The proposed rear dormer is modest, would not appear top heavy and would only add to part of the rear roofslope. It would not be visible from the street scene and would not project above the ridgeline of the host dwelling.

- 5.13 The proposed hip to gable roof enlargement would materially change the appearance of the house. The property types within the local area are very diverse and as such there is no uniformity of vernacular to protect. The proposed enlargement would be to both sides of the property such that the final result would appear balanced and the gaps between properties would be preserved. The adjacent building also has a gabled roof and the proposal is considered to be in keeping with this adjacent neighbour. For these reasons the effect of this aspect of the proposal is considered to preserve the character and appearance of the Conservation Area.
- 5.14 For the reasons given above the proposal is also considered not to adversely affect the setting of the listed building opposite. The application site is not part of the curtilage of the listed building and as the proposal does not change the boundaries of the site in which the listed building is experienced. The overall width, depth and height parameters of the application site property will also not change, such that the proposal is not considered to adversely affect the setting of the listed building.

Residential Amenity

- 5.15 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. Future residents would benefit from a communal garden to the rear, as per the existing situation serving the 'small' HMO', which provides ample space for outdoor recreation and the hanging/drying of clothes etc.
- 5.16 The separation distance are also considered to be appropriate to protect against neighbouring residential amenity with regard to overlooking, loss of light and overbearing. The back to back distance from the rear dormer is well in excess of 20m at 27m.

Transport and Parking

- 5.17 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.
- 5.18 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.*

- 5.19 It should be highlighted that the site is located in a highly sustainable location, being situated only a 4-minute walk (0.4 miles) from Reading town centre. Furthermore, various bus stops are located within a short walk of the site along Oxford Road providing regular services to Tilehurst, Purley on Thames, Reading town centre and the University of Reading's Whiteknights campus. Moreover, Reading West train station is situated only a short walk to the west providing regular services to Reading, Newbury, Basingstoke and London Paddington. 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 Reading town centre.

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

- 5.20 Adequate space for cycle storage will be accommodated in a secure covered shed in the rear garden.

Refuse Provision

- 5.21 Refuse would be stored to the front of the property as per the existing situation. Additional provision in this location would address the increased occupation of the building.

Sustainability/Energy

- 5.22 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) Maximizing the use of natural light through floor-ceiling windows
 - d) 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.
 - e) Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service

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

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

Affordable Housing

- 5.23 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

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

6.0 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 4 of this statement and the supporting plans and documents. It is considered the proposed development would provide an increased number of an alternative form of affordable housing for the local residents of Reading, without adverse effect on the character of the Conservation area, the amenity of neighbouring residents or the safety and convenience of the local highway network.
- 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.