

Planning and Heritage Statement

25 Redlands Road, Reading,
RG1 5HX

Prepared For
Kennet Investments

9091
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bell cornwell

CHARTERED TOWN PLANNERS

Bell Cornwell LLP, Unit 2, Meridian Office Park, Osborn Way,
Hook, Hampshire RG27 9HY

01256 766673 | info@bell-cornwell.co.uk | bell-cornwell.co.uk



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1 INTRODUCTION

1.1 We submit with this planning statement an application on behalf of our client for the change of use from C3 use (residential dwellinghouse) to sui generis use (as a 'larger' HMO), infilling of undercroft, single storey extension to rear following demolition of existing rear single storey extension and conversion of garage to one-bedroom flat at 25 Redlands Road, Reading, RG1 5HX.

1.2 We have submitted the following information with this planning application:

- Application forms;
- Application fee;
- Site Location and Block Plan RR:001;
- Block Plan RR:002;
- Ground Plan – Existing RR:003;
- First Plan - Existing RR:004;
- Existing Elevations RR:005;
- Ground Plan – Proposed RR:006 Rev2;
- First Floor Plan – Proposed RR:007 Rev2;
- Proposed Elevations RR:008 Rev1;
- Existing and Proposed Elevations Garage RR:009; and
- Front Boundary Elevations RR:010

APPLICATION SITE AND SURROUNDINGS

1.3 The existing property is a large detached early 20th Century house. The house lies on the corner of Redlands Road and Elmhurst Road with vehicular access from Redlands Road and parking to the front. The garden wraps around the east side of the house alongside Elmhurst Road and extends to the rear. The property was last used as a family home.



Figure 1 – Aerial image of the site

- 1.4 The site is located within the Redlands Conservation Area. The house is not listed. The site is located within Flood Risk Zone 1.
- 1.5 The site is located within a residential area of Reading and is well served by public transport. There is a regular bus service into Reading Town Centre from Redlands Road and Christchurch Road. Within a short walking distance there is a Local Centre with café, barbers, bank, pharmacy and fast food outlets etc. on Christchurch Road (A327). Within 2km of the site is Reading train station and the town centre. Reading town centre has a wide range of services and facilities. The University of Reading is within walking distance of the site, as is the Royal Berkshire Hospital.

PLANNING HISTORY

- 1.6 A search of the planning history has identified that there is only one past planning application (approval) for the demolition of a single-storey rear projection, followed by the construction of a single-storey rear extension, internal modifications and refurbishment to facilitate change of use from a single dwelling house with detached garage to 4no. self-contained flats and studio (C3a) with associated car parking, boundary alterations, bin and cycle storage (Ref: 180144).



PROPOSAL

- 1.7 Permission is sought to convert the house (C3 residential use) to a nine-bedroom House of Multiple Occupation (HMO) (sui generis) and to convert the garage into a one bedroom flat. The filling in of an undercroft area is proposed as well as a single storey extension to the rear of the house following the removal of the existing single storey element.
- 1.8 The existing dwelling on the site has a floor area of 189.6sqm (G.I.A) with an additional 31.17sqm (G.I.A) provided by the detached garage. The total floor area of the proposed residential development is 242.17sqm (new rear extension is 14.3sqm, undercroft in fill is 11.95sqm).
- 1.9 The existing traditional front elevation of the garage is to be retained. The single storey rear extension is slightly larger than that approved by planning permission 180144; it is wider and deeper measuring approximately 4m from the original house. The infilling of the undercroft area is the same as that approved (Ref: 180144).
- 1.10 Plan RR:006 Rev 3 sets out the ground floor layout as well as the landscaping plans for the site. There will be a slight enlargement to the access into the site to ensure the parking and turning of the three vehicles can be accommodated safely. Three car parking spaces are proposed. One tree is to be removed to the rear of the site and three replacement trees are proposed. Cycle parking and bin storage are accommodated to the front of the site. The resulting outdoor amenity space to be provided is 212sqm.

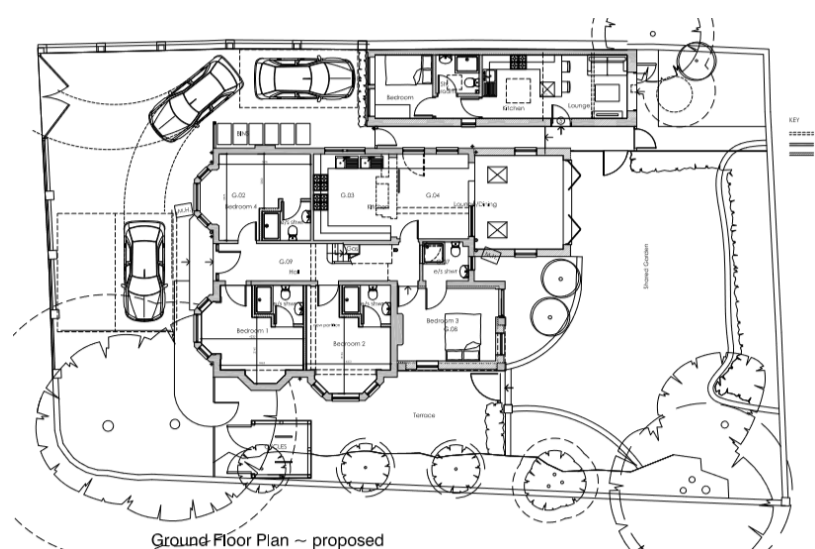


Figure 2 – Extract from plan RR:006 Rev3 showing ground floor and landscaping



2 HERITAGE STATEMENT

- 2.1 The main legislative framework for planning and the historic environment is the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990. Conservation areas are designated under the provisions of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. Weight to be given to the historical elements is a matter of planning judgement.
- 2.2 Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development. Section 16 of the NPPF provides policy on conserving and enhancing the historic environment. Paragraph 200 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. Paragraph 201 of the NPPF states that not all elements of a Conservation Area will necessarily contribute to its significance.
- 2.3 Policy CS33 (Protection and Enhancement of the Historic Environment) of the Core Strategy (2008, altered 2015) sets out that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. It advises that planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located.
- 2.4 The application site lies within the Redlands Conservation Area. A conservation area is an area which has been designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.
- 2.5 The Redlands Conservation Area Appraisal sets out the special interest of the area. It states that:



The Redlands Conservation Area comprises a tightly drawn essentially Victorian/Edwardian suburb of Reading, loosely centred around Christchurch Green, bounded by Redlands Road, Upper Redlands Road and Elmhurst Road...

The sheer variety, exuberance and blending of the architectural styles of the Victorian period in such close proximity makes the area attractive and worthy of Conservation Area status. This is reinforced by the retention of boundary walls and railings throughout the area which, together with mature tree cover, give the area its coherence.

- 2.6 In section 5.1 of the appraisal it is noted that there are no special focal points and that there are no stand out individual buildings. It is noted that corner buildings tend to be prominent in the street scene, but not from any distance. At 6.8 it is identified that the Area is ‘epitomised by mature properties situated in mature gardens, with extensive tree cover throughout, giving a general verdant feel to the area of buildings and trees in harmony’.
- 2.7 In the determination of 180144 it was stated by officers that the house is an attractive feature on the junction and contributes positively to the character and appearance of the Redlands Conservation Area.
- 2.8 The proposal would convert an existing building and its associated garage. There would not be any changes to the south west elevation fronting onto Redlands Road; the traditional garage frontage is to be retained. The main changes to the existing building are the infilling of the undercroft and a single storey extension. Otherwise, only minor changes are proposed to the side or rear elevations of the house and garage such as the removal or replacement of a door/window. None of these changes will materially alter the character or appearance of the property or have any material visual impact on the conservation area.
- 2.9 It is likely that historically there would have been a wall to the front of the site. This has been lost and fencing currently bounds the site. The fencing is in a poor state of repair at present. It is proposed that the fencing will be replaced along the front with a brick wall and vertical fencing to match with the adjacent residential property (1 Marlborough Avenue).

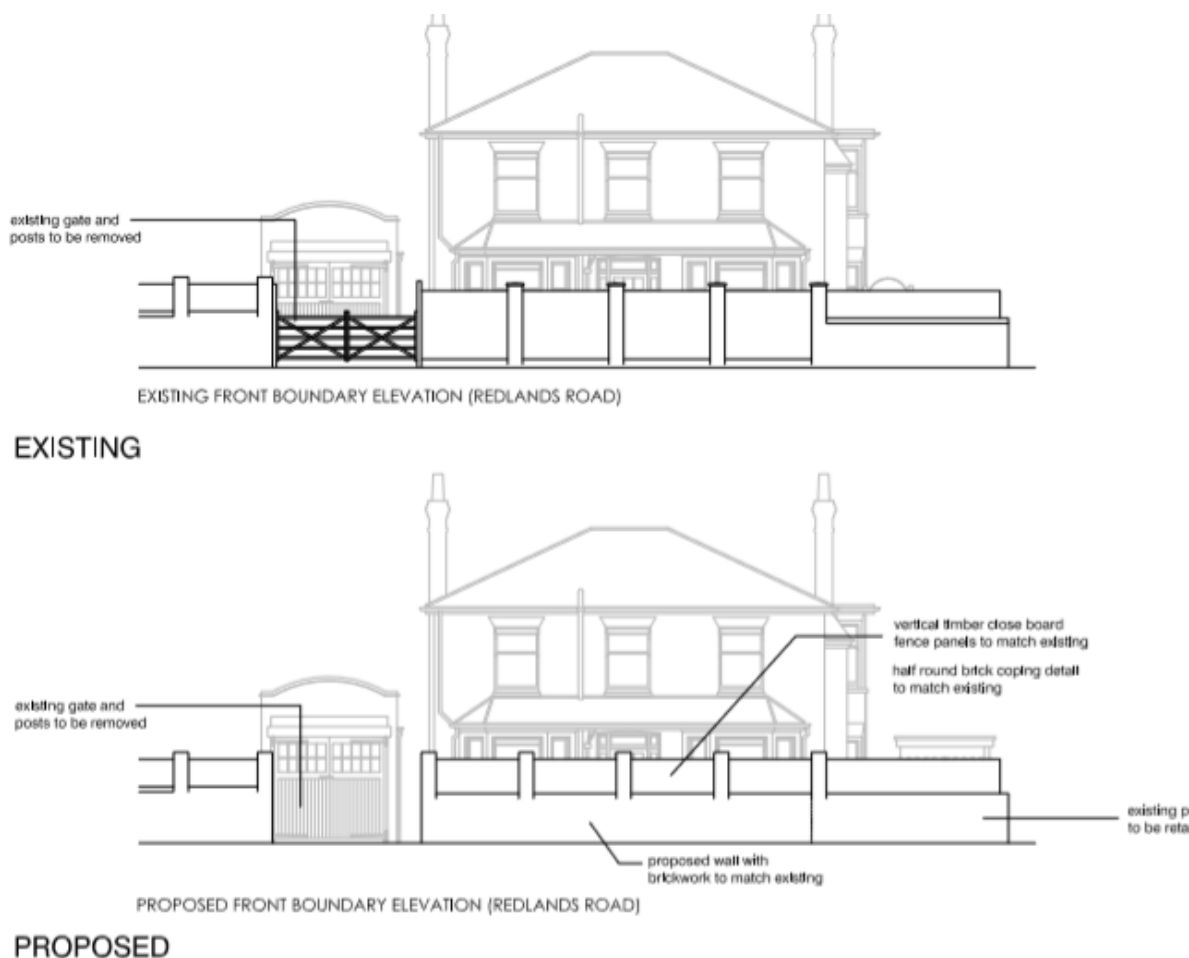


Figure 3 – Extract from Front Boundary Elevations RR:010 rev1

- 2.10 In approving planning permission 180144 Officers stated that they were satisfied that the proposed conversion of the garage of the main house would not detract from the appearance of the existing building or harm the character or appearance of the conservation area.
- 2.11 The minor external changes proposed do not result in a significant harm to the Conservation Area. The proposed boundary treatment changes would return the frontage to be more akin to what it historically would have been. It would be in keeping with adjacent properties boundary treatment. This change would enhance the Conservation Area as it would bring back what the Conservation Appraisal identifies as being the more 'traditional' boundary treatment for the Area.
- 2.12 The conversion of the house and garage would not detract from the appearance of the existing building or harm the character or appearance of the conservation area. An enhancement would be provided.



3 PLANNING POLICY CONSIDERATIONS

- 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.
- 3.2 The development plan for Reading Borough Council comprises:
- Reading Borough LDF Core Strategy 2008 (Altered 2015)
 - Sites and Detailed Policies Document 2012 (Altered 2015)
- 3.3 Material considerations should also be taken into consideration; this includes the National Planning Policy Framework (2018) 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).

THE NPPF

- 3.4 The National Planning Policy Framework (NPPF) (2018) 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.
- 3.5 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

- 3.6 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.



3.7 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 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;
- There are no unacceptable adverse impacts to other residential properties arising from noise disturbance in terms of the number and layout of units proposed and the proximity to other properties;
- There is appropriate sound insulation between proposed and neighbouring units and layouts avoid inappropriate stacking and location of rooms between units;
- 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.

3.8 The policy also sets out additional requirements in respect of sui generis HMOs. This states that:

- The property to be converted has four or more bedrooms or measures more than 120 square metres gross;
- There is an appropriate balance between communal and private areas for sui generis HMOs.

3.9 It is the intention that these policies manage the conversion of houses to flats or HMO uses in order to protect the existing housing stock as well as the amenity and character of the surrounding area, particularly in terms of intensification of activity. For future residents they also seek to ensure that there is adequate privacy, external amenity space, on-site car/cycle parking and bin storage areas.

3.10 Additional guidance in the Council's Residential Conversions Supplementary Planning Document (SPD) provides a checklist for the considerations of residential conversion applications, along with significant detail regarding the various qualities the Council expects in proposals for self-contained flats or HMOs in an Article 4 area (such as the application site).



- 3.11 The SPD reiterates the policies requirement for “the property to be converted to a flat or large HMO should 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)”. 25 Redlands Road meets the policy size criteria.
- 3.12 Standards within the SPD suggest that one communal room should be provided for each 4-6 bedrooms. Each bedroom is to be provided with its own bathroom (en-suites) and downstairs there is to be one large kitchen and lounge/dining area. This would meet the SPD’s requirements thereby providing an acceptable balance between communal and private living space.
- 3.13 The SPD also considers a 25% threshold to meet the balance between recognising that many streets are already suffering severe impacts of house conversions and are no longer considered to be balanced, whilst also acknowledging the proximity of the university to the area. It then sets a radius of 50m, with the centre being the front door of the property. Any properties which fall within the radius should be taken into account in any assessment, even when only part of the building falls within the radius.
- 3.14 In line with the requirements of the SPD we have submitted with this application a map showing a 50m radius (RR:002) from the front door at 25 Redlands Road. This identifies 11 houses within 50m not including the application site. Following a search of the planning history for these sites as well as a review of the HMO register, it appears that two houses out of the 11 houses are registered as HMOs. The Council have access to council tax information and environmental health which would provide more information on the types of the properties in the area. Therefore, using the resources available to us, we conclude that there are two HMOs within a 50m radius. Therefore, the creation of this HMO in this application will result in 25% HMOs in the 50m radius (3 out of 12 houses). The proposal is policy compliant. The proposal would provide a new and separate dwelling by converting the garage to a flat. This would result in 3 out of 13 houses being an HMO meaning the percentage of HMO’s in the 50m radius would be reduced to 23%.
- 3.15 It has been previously established through the approval of planning permission 180144 that the principle of converting the garage to a flat is acceptable.



- 3.16 The other criteria set out within the policy are considered below under their appropriate headings.

IMPACT ON CHARACTER OF THE CONSERVATION AREA

- 3.17 The Council have previously concluded that the house is an attractive feature on the junction and contributes positively to the character and appearance of the Redlands Conservation Area.
- 3.18 This scheme is very similar to that approved (ref: 180144). There continue to be only modest changes to the external appearance of the house by replacing the existing rear single storey extension with a slightly larger one, enclosing the existing undercroft area, minor alterations to window/door openings to the side/rear of the house and garage.
- 3.19 There would be no changes to the front elevation of the house or garage. All traditional features would be retained.
- 3.20 Policy CS33 (Protection and Enhancement of the Historic Environment) of the Core Strategy requires that areas of historic importance will be protected and where appropriate enhanced.
- 3.21 Policy CS7 (Design and the Public Realm) of the Core Strategy requires all development to be of high-quality design where it should maintain and enhance the character and appearance of the area.
- 3.22 The proposed changes are minor in scale meaning they will not have a significant impact upon the Conservation Area as the appearance of the buildings would not be significantly altered. The Conservation Area Appraisal notes that, whilst not widely across the Conservation Area, there has been a loss of some boundary walls and railings. Whilst this proposal would not provide railings, it would re-introduce wall and fencing boundary treatment which would be in keeping with the adjacent property. This would enhance the character of the Area whilst protecting the amenity of the existing residents. Furthermore, tree planting within the site, albeit to the rear, would positively contribute to tree coverage of the Area.
- 3.23 The proposal would not have an adverse impact on the Conservation Area. The conversion of the house and garage would not detract from the appearance of the existing building or harm the character or appearance of the conservation area. An enhancement would be provided.



AMENITY

- 3.24 Policy DM8 (Residential Conversions) of the Sites and Detailed Policies Document outlines the importance for HMOs to also consider Policy DM4 (Safeguarding Amenity) of the Sites and Detailed Policies Document which relates to safeguarding amenity on the basis that many of the planning issues associated with house conversions relate to impacts on neighbours.
- 3.25 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.
- 3.26 Only minor changes are proposed to the side or rear elevations of the house and garage. The changes are only at ground floor level, nothing at first floor. The changes proposed would not give rise to any additional loss of privacy or overlooking. The proposed rear extension is at single storey and would be separated from adjacent residents by the existing garage. This would not be visually dominating, and it would not have an overbearing impact upon the adjacent resident's property or garden. Whilst it is acknowledged that there would be additional people residing in property and in the garage compared to its existing use, there is no evidence to suggest that this would give rise to any greater noise levels and therefore no additional level of disturbance to adjacent residents. The use of the house as an HMO and the garage as a flat would not harm the residential amenity of neighbours and therefore Policy DM4 is complied with.
- 3.27 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 proposal would achieve 212sqm of communal external space. This is a good-sized space which would be usable by the residents of the entire site.

PARKING AND TRANSPORT ISSUES

- 3.28 It is our understanding that 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). This SPD requires one car parking space for the flat and an additional 2.25 for the HMO. Therefore, a total of 3.25 car parking spaces for this scheme.
- 3.29 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 developments will not result in a highway safety issue, result in congestion and have an impact upon the environment.
- 3.30 The proposal would provide three car parking spaces. The existing house already has hardstanding at the front of the property which could accommodate three car parking spaces and the manoeuvring of vehicles. To ensure that the three cars can be appropriately accommodated on site and manoeuvre safely (to ensure entry and exit of the site in a forward gear) minor alterations are proposed to the site access. The proposed three spaces and parking layout is the same as previously approved by 180144. It is therefore appropriate to conclude that this would again be considered acceptable as no severe impact on the highway would be caused.
- 3.31 It is acknowledged that the proposal would not meet the full 3.25 car parking space requirement set out in the SPD. The proposal would be 0.25 spaces short. It is appreciated that future residents would not be issued with resident parking or visitor permits. The shortfall of 0.25 should not be an overriding concern to the Council due to the sustainable location of the site (proximity to shops/university/hospital/regular bus service).



- 3.32 Cycle parking can be accommodated within the site and a cycle shed has been identified to the side of the plot.
- 3.33 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.
- 3.34 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.

ECOLOGY

- 3.35 It has been previously concluded by the Council that the extent of the works and structures to be affected are unlikely to house bats or protected species. Therefore, no adverse effect would be caused by the proposed development.

AFFORDABLE HOUSING AND CIL

- 3.36 The proposed development would result in the creation of one new standalone dwelling. Consequently, it is understood that an affordable housing contribution would be required in relation to that one new dwelling. Due to the nature of the site and the application, it would not be appropriate for on-site provision. An off-site contribution would need to be agreed.
- 3.37 Furthermore, due to the net gain of one new dwelling, a small CIL payment will be necessary.



4 CONCLUSIONS

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the 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.
- 4.2 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 give rise to an imbalance of private housing and HMO's as the 25% test can be met.
- 4.3 The minor external alterations and the proposed extension are appropriately located within the site and are of a suitable design to ensure there would be no adverse impact on the character or appearance of the area. The front of the house and garage would not be altered. The boundary treatment along Redlands Road would be enhanced. There would not be an adverse impact on the Conservation Area as a result of the proposed conversion.
- 4.4 The amenity for future and existing residents has been demonstrated as being acceptable. Whilst it is acknowledged that there is a slight under provision of car parking, the location of the site is such that alternative, sustainable, methods of transport are easily accessible thereby reducing any dependency on the private car.
- 4.5 We would urge the Council to support this proposal.