

ATLAS

PLANNING GROUP

PLANNING STATEMENT

Mulberry House, 1A Eldon Road, Reading, RG1 4DJ

April 2018

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1. SITE DESCRIPTION

- 1.1 Although planning permission has been granted for its demolition (LPA Ref: 171521), the site currently comprises a single storey flat roof building, formerly used as a dental surgery (Use Class D1). An area of green space also forms part of the site, which is located to the west of the building, abutting Eldon Road.
- 1.2 The site is situated within the Eldon Square Conservation Area and is bounded to the north by an eight-storey block of flats, which were formerly offices, and a pair of 19th century semi-detached houses to the south. Although separated by both Eldon Road and a large area of green space, a row of Grade II Listed buildings is located opposite the site.
- 1.3 Access to the site is positioned to the rear of No. 1 and 3 Eldon Road, via Eldon Terrace, where an area of car parking is located.



Figure 1: The existing building viewed from Eldon Road

2. PLANING HISTORY

PRE-APPLICATION 170968/PREAPP

- 2.1 In June 2017, an application seeking pre-application advice was submitted to Reading Borough Council for the demolition of the existing building (use class D1) and erection of a 6-storey building, accommodating 8x1 bed and 3x2 bed flats and parking for 3 cars.
- 2.2 In August 2017, advice was provided by the Planning Officer, along with comments from the Design Review Panel. In summary, whilst the principle of development was considered acceptable, it was identified that the site was challenging given its existing and surrounding area constraints. The proposed scheme was ambitious, and careful consideration was required with regards to the form of the proposal, the impact on the Conservation Area, transport, amenity and trees/landscaping.
- 2.3 Officers concluded that, *“although there were many challenges in bringing forward a suitable proposal at the site, these were not insurmountable”*. This proposal brought forward today therefore follows on from the advice provided by the Council at the pre-application stage.



Figure 2: Elevation of proposed scheme put forward for pre-application advice

FULL PLANNING APPLICATION 171521

- 2.4 In December 2017, an application for the demolition of Mulberry House and soft landscaping was approved by Reading Borough Council.

3. THE PROPOSAL

3.2 The proposal is to demolish the existing low-quality building and to erect a high quality contemporary 3 and 5 storey building, accommodating 4x2 bed and 3x1 bed flats, 5 parking and 10 cycle spaces.

3.3 The scheme seeks to address the comments made by both the Design Review Panel and the Planning Officer, by proposing a contemporary building, which has been reduced in massing to respect the character and appearance of the surrounding heritage assets and redesigned to present an open face to the street, with balconies and larger openings.



Figure 3: Proposed photomontage

4. PLANNING CONSIDERATIONS

PRINCIPLE OF DEVELOPMENT

4.1 The proposal seeks to demolish the existing building, which was previously used as a dental surgery (use class D1) and to erect a three and five-storey building in its place. Core Policy CS31 (Additional and Existing Community Facilities) states that *“proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be demonstrated that there is no longer a need to retain that facility”*.

4.2 It is important to note that the loss of this building and its use has been established through the approval of planning application 171521, which sought to demolish the existing D1 building in 2017.

4.3 In the submission of the demolition application (LPA Ref: 171521), it was highlighted that the dental practice that operated from Mulberry House ceased to function about 2 years ago. The property was then marketed by New Ballerino Estate Agents. Director, Steve New has stated:

“I can confirm that New Ballerino were instructed to sell the freehold of Mulberry House in November 2016. The existing lease was due to expire in March 2017, and the freeholders decided to sell the site. We understand the dentists did not want to remain in occupation and therefore we were able to sell the site with vacant possession.

Mulberry House was widely marketed. We advertised the opportunity on the New Ballerino website as well as EG Propertylink, Nova Loca, EACH, Rightmove Commercial and CoStar. The brochure was also circulated to property agents in London and the South East of England by Perfect Information Property, as well as being up loaded on the Office Agents Society website.

The property brochure was also sent as an ewire to a list of 479 developers and investors from our database.

In total we had just under 70 individual specific enquiries regarding the property generated by the online marketing and the board, with 6 offers received and submitted to our clients. In terms of the enquiries, it is fair to say that virtually every enquiry was for conversion/ redevelopment of the site to residential purposes. We did not receive any enquiries for the property as an existing use.”

- 4.4 In addition to no new demand for the D1 building, a new dental practice was being established by the same dentist within Reading. In October 2016, an application for the change of use of no. 7 Cheapside, Reading, from retail (Class A1) to dental surgery (Class D1) was submitted to and validated by Reading Borough Council (LPA ref: 170665). The application was approved in December 2016, where Vesta Dental Care was subsequently founded by Dr T F Mottacki - the same dentist who ran the practice at Mulberry House. Dr Mottacki has since confirmed Mulberry House Dental Surgery closed on the 30th March 2017 and that he took all of his existing patients with him to his new surgery at 7 Cheapside.
- 4.5 Owing to the establishment of a new dental practice run by the same dentist within Reading, only 1 mile from the dental practice dissolved, and the fact that it has been confirmed that all patients were taken to the new practice, it was demonstrated that there was not a net loss of a valued facility and service: the community still has access to the services they need.
- 4.6 Moreover, there was no other evidence to suggest that the loss of the practice has resulted in the local community being unable to access dental services and treatment. As demonstrated in Figure 2, there are a number of other dental practices, private and NHS, within the area.

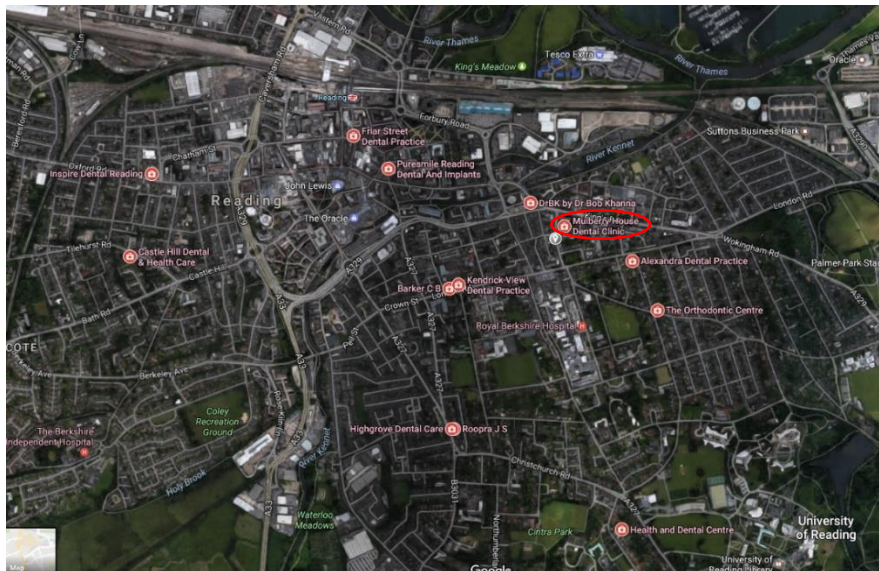


Figure 4: Dental surgeries in the area around the application site

- 4.7 In particular when examining the NHS Choices list of dentists within 5 miles of Reading, forty-one practices were listed, seven of which were certainly accepting new NHS patients (see Appendix A). Figure 3 demonstrates the NHS dental practices within the locality of Mulberry House - there was not a shortage of

dentists within the surrounding area of the application site. Indeed, The Care Quality Commission listed 82 dentists, including both individuals and organisations, of which 40 offers services for everyone.

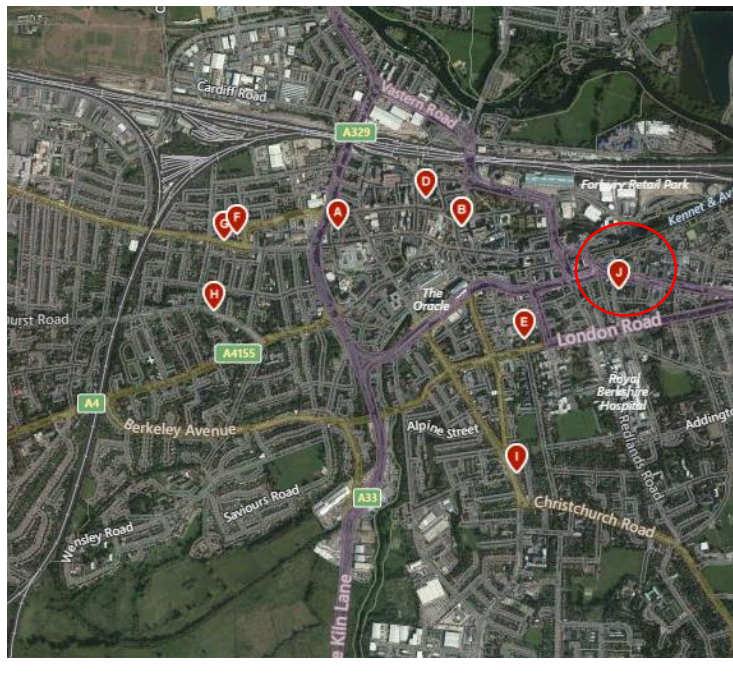


Figure 5: NHS dental surgeries in Reading

4.8 The Officers at the Council were also made aware that even the re-use of the building as a dentist or any other community facility would prove financially unviable. In terms of standards, if Mulberry House was to be re-used for its existing use, the practice would need to register and comply with the requirements of the CQC in relation to access, patient safety and sanitation.

4.9 One of the key factors in any assessment of a new practice would be the accessibility of the premises to people with a range of disabilities. The building was a purpose-built structure, which was constructed in 1960s. The building was not adapted over time to meet modern standards and therefore, could not be said to meet modern expectations and standards. It was considered that, on balance, the cost of modernising the building and bringing the practice up to the appropriate standards, would make the development unviable.

4.10 In determining the application, the Officer carefully considered the above arguments and, owing to the poor state of repair; relocation of the business to a different building within the town centre; marketing commentary showing no interest and an absence of public concern, the Officer concluded that the proposed development did not conflict with either local or national policy and thus, the loss of the community use was acceptable. Planning permission was therefore granted for the demolition of the D1 use.

4.11 The pre-application response (Ref: 170968/PREAPP) notes *“should the loss of the existing use be able to be established in due course, then the principle of a residential scheme at the site would align with the broad objectives of Policy CS14.”* Therefore, as the loss of the D1 use has been established, it is considered that the principle of development is acceptable, subject to site specific issues.

HOUSING MIX

4.12 The proposed development is for 3 x 1 bed apartments and 4 x 2 bed apartments. Policy DM5: Housing Mix states that *“on new developments for **10 or more dwellings** outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more.”* As the proposed development comprises a scheme of 7 dwellings, it is considered that the housing mix proposed is appropriate for its location.

4.13 Policy CS15 of the Reading Core Strategy states that *“Developments should provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures, in accordance with the findings of a housing market assessment”*. The supporting text of this policy highlights that the Berkshire Strategic Housing Market Assessment predicts that the growth in households in Reading between 2006 and 2026 would be divided as 67% one-person households and 14% lone parent households. It is therefore considered that the proposed housing mix for this development would help provide housing for this demand.

AFFORDABLE HOUSING PROVISION

4.14 The proposed development comprises 7 residential units. As such, Reading Borough Council would look to secure 20% affordable housing, in accordance with Policy DM6. Although the Written Ministerial Statement has confirmed that contributions to affordable housing should not be sought from developments of 10 dwellings or fewer, it is appreciated that there is an acute need for affordable housing in the Borough and RBC

are robustly defending this position. Accordingly, the Applicant is willing to provide an affordable housing contribution, in line with Policy DM6.

- 4.15 In line with Policy DM6, a provision of 1.4 dwellings is therefore required. This application is accompanied by an Affordable Housing Statement to further explore this contribution.

IMPACT UPON THE CHARACTER OF THE AREA

DESIGN

- 4.16 The pre-application advice was accompanied with comments made by the Design Review Panel (DRP), which helped to shape and inform the final design concept.
- 4.17 The DRP highlighted that *“there is potential for additional development on the site, if consideration is given to how any proposals bridge the change in scale between the two neighbouring buildings.”* Moreover, it was noted that overlooking / amenity impact into both Hanover House and the properties in Town Place / Eldon Terrace needs to be well managed, but a reduction of the massing by a floor or so would deliver the opportunity to generate a more appropriate solution.
- 4.18 Whilst the accompanying Design and Access Statement by OB Architecture explores the design concept further, the proposed development has essentially addressed the concerns raised; the proposal has reduced the massing by a floor, revised the design to ensure that the building addresses Eldon Road, and has provided efficient flat layouts.
- 4.19 It is important to note that the form of the proposed building has also been altered so that it addresses Eldon Road, with an active frontage, incorporating larger openings and balconies. The proposed development is clearly a residential building and is less ‘commercial’ in appearance than that previously put forward for pre-application advice.
- 4.20 Additionally, the detailed design of the proposed development has been informed by the local vernacular in terms of materials. Whilst the DRP had concerns over the choice of materials and its potential impact upon the scheme’s viability, it should be noted that the design has been carefully considered. Drawing no. 186-D-09 highlights the materials to be used on the scheme, which have been chosen to reflect the local vernacular

of Bath stone. The materials have been chosen as a high-quality alternative to Bath stone to avoid impacting the scheme's viability.

4.21 There has been a clear effort to tie the scheme proposals into the established character of the Conservation Area. The application site has been subject to extensive redevelopment and as discussed in the accompanied Heritage Statement, the historic setting of the site has been lost. As such, the design does not intend to create a pastiche of the historic buildings surrounding the site. Instead, the modern development in the Conservation Area has informed the architecture of the application.

4.22 The existing low-quality boundary wall facing Eldon Road is proposed to be refaced in the same materials as the proposed building. The arch which was previously proposed as part of the pre-application has been removed to make the green area more open to the public realm. The existing boundary wall, whilst unassuming, is of low quality and incongruous, therefore its replacement with high quality materials represents an opportunity to contribute a positive addition to the Conservation Area in this most publicly visible part of the site. Indeed, Policy CS33 of the Core Strategy (2008, 2015) promotes proposals which bring 'appropriate enhancement' to Heritage Assets.

4.23 The design of the proposal responds to the practical constraints of the site in an architecturally meaningful way and would be in scale with its surroundings. Indeed, the property has been reduced by a floor to be more sympathetic to the neighbouring villas, and the essential qualities of the open space to the front of Mulberry House would be retained, along with the mature vegetation. The proposed design and choice of materials would sit comfortably within its local context. Furthermore, it relates well to the competing influences of the architecture in the surrounding area and would respect the existing character and appearance of this part of the Conservation Area and its historic context.

4.24 As demonstrated in further sections of this report, there will be no issues in terms of overlooking or being overbearing. The design of the proposal is ambitious and contemporary, but clearly responds to the character of the Conservation Area and the nearby listed villas. As such, it is considered that the proposal will not detrimentally impact the character and appearance of the area.

HERITAGE IMPACT

- 4.25 The application is supported by a Heritage Statement to examine any impact of the proposals have on the heritage assets. In summary, it is considered that the proposals are able to preserve what is significant about the setting and character of the Conservation Area and surrounding listed buildings.

IMPACT UPON RESIDENTIAL AMENITY

IMPACT UPON NEIGHBOURING PROPERTIES

- 4.26 The proposal seeks to demolish the existing building and erect a taller and broader 3 and 5 storey building. Policy DM4 safeguards amenity by ensuring that developments do not cause significant detrimental impacts to the living environment of existing or new residential properties.
- 4.27 Owing to the conscious awareness of the site's constraints and the careful formation of its design, the proposed development will not detrimentally impact the amenity of surrounding residents, particularly in terms of overshadowing or overlooking, as outlined below:

OVERSHADOWING

- 4.28 In response to the pre-application advice, Hawkins Environmental Ltd were instructed to undertake a daylight, sunlight and overshadowing assessment of the 6-storey pre-application scheme to understand the potential impacts on neighbouring properties, and to help inform any future proposals.
- 4.29 The results of the daylight assessment showed that the reduction in daylight to a single window at both No. 8 and 9 Town Place would be large enough to be noticeable, and that 16 of the 79 windows at Hanover House did not fully meet the recommendations of the BRE guidance. The sunlight assessment demonstrated that 4 windows would be affected during both the whole year and during the winter months, plus a further 3 windows during the winter months only. Drawing upon these results, it became clear that the six-storey pre-application scheme would adversely affect the amenity of surrounding residents. In response, the design of the proposal was revised, and massing reduced to three and five storeys, to ensure that there were no impacts upon the living conditions of neighbouring properties.
- 4.30 In comparison to the previous pre-application scheme, the proposed development will not have any adverse impacts on the surrounding neighbours in terms of overshadowing, as demonstrated in the

accompanied report by Hawkins Environmental. The daylight assessment concludes that, whilst there is a small reduction in daylight to some of the windows on Eldon Road and Town Place, the reduction in daylight is unlikely to be noticeable and therefore the impact of the proposed development on levels of daylight is considered to be “negligible”.

- 4.31 Moreover, in terms of sunlight, it was noted that, although there will be a reduction in daylight to 8 windows in Hanover House, under the guidance contained within Appendix I of the BRE Report, it is considered that this have be a “negligible” impact on the occupiers. It is therefore considered that the proposal is at an appropriate scale to not have any impact the living conditions of neighbouring properties in terms of overshadowing.

OVERLOOKING

- 4.32 Despite being positioned in an urban environment where some interconnectivity of views between properties should be expected to occur, the windows and terraces of the proposed development have been sympathetically positioned to ensure that no undue overlooking is caused.

- 4.33 In terms of Hanover House, it should be noted that the proposed development has been carefully designed to ensure that the floor levels of the proposal are set at different levels to the eight-storey building to avoid any direct overlooking (see section drawing 186-D-14). Moreover, on the northern elevation, the stairwell has been positioned to avoid any overlooking in this direction, along with a small bedroom window, which despite being a habitable room, will not be in frequent use.

- 4.34 Whilst windows on the southern and western elevation are proposed, a significant degree of planting is present in this area, comprising c.18m tall mature trees, separating the proposed development from Nos 1/3 Eldon Road and the terrace of houses to the rear, along Eldon Street. Given that these trees are mature and located within a Conservation Area, they benefit from statutory protection and could not be removed without permission from the LPA. It is considered that the dense screen that these trees provide, would prevent any overlooking and preserve the privacy of the amenity space of the surrounding residents. Despite this, it is important to highlight that there is a back-back distance of 20m between terraced houses along Eldon Street and the proposed building. This is in accordance with Policy DM4 of the Sites and Detailed Policies Document (2012, 2015).

4.35 Additionally, design features have been incorporated into the proposed building to further limit overlooking, or perceived overlooking, such as ‘integral terraces’ at first and second floor level. These terraces have been carefully positioned within the building to limit any downwards visibility splay towards the neighbouring properties. Moreover, the building steps in as it increases in height, further restricting any overlooking.

IMPACT UPON FUTURE OCCUPIERS

4.36 In terms of the living conditions of future occupiers, the sizes, outlook and level of daylight likely to the rooms themselves have also been considered to provide a satisfactory level of amenity for the future occupiers of the new units. Indeed, the rooms are not ‘minimum’ sizes, all apartments are good sized and well positioned windows to ensure good levels of natural light and ventilation. Within the pre-application response, the Officer was concerned that *“the layout of the units was somewhat unusual in shape”*. However, it is important to note that the living arrangements of the flats have been revised to ensure that the accommodation provided is of a high quality.

4.37 Additionally, in accordance with Policy DM10 of the Sites and Detailed Policies Document (2012,2015), all of the proposed residential units will have access to landscaped communal gardens, together with private outdoor amenity space in the form of terraces. Within the accompanying text of Policy DM10, it is stated that a key aspect of design quality is ensuring it is clear which areas are communal and which are public. The new boundary treatment proposed to the wall fronting Eldon Road will provide this clarity, whilst retaining the openness of the space, in-keeping with the character of the area.

HIGHWAY SAFETY

4.38 The proposed development comprises on-site 5 parking spaces and cycle storage for 10 bicycles on site. This application is accompanied by a Transport Statement to examine the impacts upon highway safety.

IMPACT UPON TREES

4.39 The proposed development has been informed by an Arboricultural Statement produced by David Archer Associates.

4.40 The trees within and adjacent to the site have been assessed and the root protection areas mapped. The health and longevity of the trees is of paramount importance. The scheme has been revised since the pre-

application to ensure that no impact to the trees occurs. In particular, the proposed layout of the entrance from Eldon Road has been changed from a ramped access to retention of the existing stepped access. Moreover, it should be noted that the footprint of the proposed building falls outside of the RPAs of the trees and the existing concrete footpath is to be replaced using an above soil proprietary cellular confinement system.

5. CONCLUSION

- 5.1 The application site lies within an established urban area, which is “sustainable” in planning terms, and the contribution of the proposed development would make to the provision of residential accommodation in the locality. Historically the application site formed part of the grounds of a substantial building built in the 1830’s. However, currently it is surrounded by more modern development within the Conservation Area. Hanover House, a large post-war tower block is located to the north of the site, whilst a pair of historic cottages is situated to the south.
- 5.2 The existing building itself is plainly unsatisfactory by current standards, in terms of its construction and the retention of a commercial use would not be viable. The scheme’s relatively simple, contemporary style would affect a transition from the more traditional and historic character of Eldon Road to the large scale and block-like architecture of Hanover House to the north. The design and choice of materials has clearly been drawn from, and would sit comfortably within, its local context.
- 5.3 Drawing on this assessment and for the reasons set out above, it is considered that the proposal has the ability to ‘*preserve*’ what is significant about the character of Eldon Square Conservation Area. As such, it is considered that the proposals comply with both local (Reading Core Policy CS33 and CS7) and national policies on conserving and enhancing the historic environment, including the advice contained in the NPPF and most importantly of all in heritage terms, pass the statutory tests set by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.