

Planning Statement

**82 Star Road, Caversham,
Reading, Berkshire RG4 5BE**

Prepared For
MGH Design Services

8411
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bell cornwell

CHARTERED TOWN PLANNERS

Bell Cornwell LLP, Oakview House, Station Road,
Hook, Hampshire RG27 9TP

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



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1 INTRODUCTION

- 1.1 This report has been prepared to accompany an application by MGH Design to Reading Borough Council (RBC) for Listed Building Consent and Full Planning Permission, in respect of the property known as 82 Star Road, Caversham.
- 1.2 The purpose of the report is to provide an overview of the proposed development, including a summary of the various supporting technical documents and to set out the planning justification, having regard to the relevant planning policy considerations and any material planning considerations.
- 1.3 It concludes that the proposed development would 'on balance' be acceptable in planning terms, assessed against the Council's adopted development plan and material planning considerations.

About Bell Cornwell LLP

- 1.4 Bell Cornwell is an independent planning consultancy and was established in 1986. We have over 300 years of collective experience in the industry and are chartered members of the Royal Town Planning Institute (RTPI).



2 THE SITE AND THE PROPOSED DEVELOPMENT

DESCRIPTION OF THE SITE

- 2.1 The application site is located within the settlement of Caversham, on the North side of Reading in Berkshire. Star Road is a residential area, comprising of a range of dwelling types, including Victorian terraces, modern detached houses and semi-detached properties. Number 82 comprises of a small detached cottage with rendered walls and slate tiles. The original property dating back to the 17th Century and search of the National Heritage List for England (NHLE) reveals that it is Grade II listed.
- 2.2 Further details are provided in the Heritage Impact Assessment (HIA), which accompanies the application. However, it is noted that the earliest part of the building represents a single-cell cruck-framed cottage and is an example of an extremely basic rural dwelling-type that we understand rarely survives in legible form. It has also seen various alterations during the 18th and 19th Centuries, as well as more recent additions.
- 2.3 Despite its heritage significance, the property is not in good condition, having fallen into a state of disrepair over the years. Whilst it is also understood, from discussions with Reading Borough Council (RBC), that there have been attempts in the past to restore the property, it is suspected that the difficulty of the restoration project, combine with cost, has proven to be inhibiting. Its small size and layout also makes it less attractive for modern day lifestyles.
- 2.4 Indeed, the online planning history for the site reveals that the following separate Listed Building and Planning Applications were withdrawn:

Application Reference	Description of Proposed Development	Decision	Date of Decision
121484	Demolition of rear extension, erection of two storey rear extension, replacement of windows and connection through rear roof slope. Internal alterations including removal of staircase and opening of fireplace	Withdrawn	14/09/2012



121390	Demolition of existing single storey rear extension, erection of a two-storey rear extension, and a part two storey and single storey side extension	withdrawn	14/09/2012
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Table 1. Planning History (Source: www.reading.gov.uk)

- 2.5 No other planning history could be found.
- 2.6 The cottage does however sit within a good-sized plot, and whilst neighboured on both sides and at the rear, it enjoys a reasonable degree of privacy. Indeed, its garden, which wraps around the North and East elevations, is notably larger than other found on Star Road. Even so its setting is significantly eroded by neighbouring properties and whilst the garden is now void of any buildings, remains (hard standing) are still present from past outbuildings.

THE PROPOSED DEVELOPMENT

- 2.7 The proposed development can be described as follows:
- “The erection of a single detached dwelling and restoration of the existing Listed Cottage, including the construction of a replacement extension.”***
- 2.8 The main objective of the proposal is to secure the renovation of the Listed Cottage. As already stated, whilst achievable, time has shown that the cost of repair works, combine with the size of the dwelling have made this a less attractive proposition to potential purchasers. The Applicant’s solution is to secure the necessary funding for the works to the cottage by securing planning permission for a separate dwelling within the plot.
- 2.9 The proposed dwelling would comprise of a two-storey detached house, designed in a modern but sympathetic architectural style, which is reflective of the existing variety of properties found within the street. Due to the constraints of the site, it has been set back within the plot, which reduces its impact on the setting of the listed building, but also enables the property to be set above predicted flood levels.
- 2.10 Parking is to be provided to the front of the site, which is consistent with the existing arrangement.



- 2.11 In addition, it is proposed to extend the existing cottage by replacing the existing rear extension with a more suitable addition. This would be a single storey brick built structure, with clay plain tiles, to match the existing. Its ridge height will sit around 2m below the height of the existing cottage and will reveal a previously hidden external ground floor window at the rear of the property. In combination with the restoration of the listed building, this will create further space and improve the liveability of the cottage.
- 2.12 An outline schedule of works is provided by Asset Heritage Consulting, which reveals the extent of anticipated works to the listed building.

PRE-APPLICATION

- 2.13 It is believed that pre-application discussions were held between a Mr Best and RBC in 2015, prior to MGH Design Services' involvement, but these nevertheless established that the Council were concerned for the condition of the Listed Building. Whilst the building has now been stabilised, it remains the case that the building needs significant restoration works to ensure its long-term retention. More recent discussions between MGH Design Services and the Council, have established that a key issue is the necessity for the project to be financially viable. To that end, it has been suggested that the proposed works might be deliverable through 'enabling development' mechanisms.
- 2.14 To qualify as 'enabling development' means that the development would need to be considered harmful in planning terms, but the benefits of restoring the Listed Building outweigh that harm. The measure of harm is largely based on subjective and professional judgements, but in this case, it is considered that the proposed development will lead to the protection and enhancement of the listed building. This is a considerable public benefit that has the potential to outweigh any harm.
- 2.15 The particulars of the identified impacts, both positive and negative, are set out in the various application documents. However, it is our opinion that following the strict enabling criteria, as set out by Historic England, is not necessary in this case. Even so, the benefits of the proposal still lay with the schemes viability, which require the proposed development to be completed in its entirety. In our opinion, the viability of the proposal can be assessed as a material planning consideration, outside, but using a similar ideology to 'enabling development'.



- 2.16 A financial appraisal is supplied with the application, setting out the identified costs for the proposed scheme.



3 PLANNING ASSESSMENT

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 For the purposes of this application, the Development Plan comprises of saved policies from the RBC **Core Strategy** (CS)¹, RBC **Sites and Detailed Policies Document** (SDPD)², and the **Proposals Map**³. Although not yet adopted, the Council is currently preparing a new Local Plan which will eventually replace the existing version. It may therefore be referred to within the below section, but as it is only in draft form, it does not yet have full weight in planning decisions.
- 3.3 Reference is also made to the **National Planning Policy Framework** (NPPF), which is given significant weight as a material planning consideration, and other adopted/relevant guidance, as appropriate.

THE PRINCIPLE OF DEVELOPMENT

- 3.4 A search of the Council's Proposal's Map shows that the site is located within the defined settlement boundary where residential development is normally preferred, as it is seen to be the most sustainable location. In this case, the site is within walking distance of Reading Town Centre and has easy access to public transport links, including Reading Train Station (1.3km) and local bus services (nearest bus stop, 80m). The site is therefore in a highly sustainable location and thus suitable in those terms for the proposed development.
- 3.5 The above is however only one consideration in the delivering of sustainable development. As well as hosting a listed building, the site also falls within Flood Zone 3a where there is a heightened probability of river flooding, outside of the functional flood plain. In considering the Council's normal planning policy requirements, we therefore identify the main issues to relate to the following topic areas:

¹ Adopted January 2008 and altered January 2015

² Adopted January 2009

³ Adopted October 2012



- Heritage Significance;
- Development of Private Residential Gardens;
- Flooding (including sequential and exception tests);
- Highways and Parking;
- Affordable Housing;
- Ecology and Trees;

HERITAGE SIGNIFICANCE

- 3.6 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the Council's general duty, for when considering whether to grant planning permission development which affects a listed building or its setting. It requires that ***"the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"***.
- 3.7 As might therefore be expected, this requirement is transposed within the Council's Development Plan, with CS Policy CS33 stating that ***"Planning permission will only be granted where development has no adverse impact on historic assets and their settings"***.
- 3.8 To make this judgement, the NPPF provides further guidance in its chapter 12. We draw your attention to the following paragraphs:

Paragraph 128 – *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

Paragraph 133 – *"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss..."*



Paragraph 140 – *“Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies”.*

- 3.9 In having regard to the above a heritage impact assessment has been undertaken by Asset Heritage Consulting to evaluate the effects of the proposed development on the heritage asset. The conclusions reached establish that extensive conservation works are necessary to the listed building, noting that the funding for the new building and extensions is the only practical means of achieving this on a sound financial basis.
- 3.10 Even so, the heritage assessment makes clear that although the construction of a new dwelling within the grounds will have a modest impact on the setting of the listed building, the setting is not one of the key features of the buildings significance, as this has already been compromised by 20th century development on all four sides. The public benefits attributed to the restoration of the heritage asset far outweigh this harm.
- 3.11 Further, the proposed extension to the existing dwelling will replace poorly realised extensions that have done little to respect the buildings heritage significance. The proposed extension is however considered to be a suitable addition, with the benefit of making the property a more suited family home, which is the buildings historic and optimal use.
- 3.12 Therefore, whilst the proposed development may result in modest harm, this is less than substantial and in our judgement, is outweighed by the benefits of the scheme.

DEVELOPMENT OF PRIVATE RESIDENTIAL GARDENS

- 3.13 The construction of new dwellings in residential gardens is not necessarily unacceptable in planning terms, however regard does need to be given to the NPPF, which removes residential gardens in built-up areas from its definition of previously developed land. RBC have also set out their own specific policy requirements under SPDP Policy DM11.
- 3.14 This is a permissive policy that allows development within the curtilage of private residential gardens, where the proposal makes a positive contribution to the character of the area, and does not cause a significant detrimental impact to the amenity of adjacent and nearby



occupants. The other relevant criteria of the policy are dealt with elsewhere within the application submission.

- 3.15 The main matters hereby considered are character (including design), and amenity. In respect of the local character, there is some local variation, but on the west side of Star Road the prevailing street patterns is predominantly linear in form. The same does not carry over to the East side of the street. In this area, the street pattern is organised around cul-de-sacs and closes. As a result, development exists all around the site, with residential development abutting each of its boundaries.
- 3.16 Notably, the new dwelling is to be built behind the main street frontage, allowing the listed building to remain as the dominant building, where there is a line of sight to the plot. Even so, this arrangement would nevertheless continue a second line of development that extends through the properties to the rear of the site on Eccles Close.
- 3.17 The design of the proposed dwelling also means that its gable end faces the street, with the main bulk of the dwelling set further back, giving the impression of a smaller dwelling in the street scene. The ridge height also sits at a similar height to number 82, so from street level it cannot be seen over the top of the roof, which coupled with the setback, means that the setting of the listed building can still be read.
- 3.18 In terms of its general appearance, the proposed dwelling would be a modern addition, but this corresponds with other recent developments (e.g. at number 78D) and the variety of dwelling styles found within the street. In that respect, the property is typical of what you might expect in a modern development and is of a form that is in keeping with the character of the area.
- 3.19 From an amenity perspective, the new dwelling would sit most closely with the boundary of number 84 Star Road. Even so, and although it is acknowledged that the proposed house would be visible from the rear of that property, the most effected rooms will be the upstairs bedroom and the rooms within the rear extension.
- 3.20 In respect of the first-floor bedroom window, this will not be overlooked because the proposed development is sufficiently setback and beyond the side of number 84. It is otherwise recognised that the Rear extension to the same property does otherwise extend beyond the line of the proposed dwelling, but as this is only single storey and despite having



a window that faces the site, this would still only have substantial views of the boundary fence. A daylight/sunlight assessment exercise has also been undertaken to ensure that there will be no unacceptable loss of light. The report concludes that the proposed development will not result in unacceptable harm.

- 3.21 It is therefore concluded that the proposed development, despite being on 'residential backland' it would not be out of keeping and there will be no significant harm to neighbouring amenity.

FLOODING (SEQUENTIAL AND EXCEPTION TESTS)

- 3.22 It has been identified from the accompanying Flood Risk Assessment (FRA) that the site lies within Flood Zone 3a, where there is a high probability of flooding. As a result, the FRA recommends that the finished floor level of the new dwelling is set 300mm above the predicted 1 in 100year plus climate change level (+35%). The dwelling will be 800mm above ground floor level, measured from the pavement.
- 3.23 Even so, because the site is in flood zone 3, the NPPF requires a sequential and exception test to be applied to the proposed dwelling. Taking these in turn, the sequential test seeks to direct developments to Flood Zone 1, then Flood Zone 2 and then Flood Zone 3, to reduce the level of development at risk in a flood event. The exception test is then applied when it is not possible to place the development in a less vulnerable flood zone.
- 3.24 In this case, because the proposed development is closely linked to the deliverability of the works to the Listed Building, it is not practicable to consider locations outside the limits of the application site. As the whole site is within Flood Zone 3, there is therefore no practical proposition of moving the development outside this zone of vulnerability. The chosen position, does however seek to place the dwelling in the least vulnerable part of the site, over an area that is already in part hard standing from previous buildings. Its location therefore reduces the risk to the property in a flood event.
- 3.25 For the same heritage benefits, which are a significant public benefit, the exception test can then be applied and passed, because there is no realistic opportunity of building the proposed development elsewhere, as this would act as a disincentive to undertaking the works to the listed building.



- 3.26 As a further measure, several flood resistance and resilience measures are recommended in the FRA. Whilst not all the recommendations necessarily need to be followed, where they can be incorporated it is proposed to follow the recommendations set out in the report. These can be secured by planning condition.

HIGHWAYS AND PARKING

- 3.27 The NPPF states that transport policies have an important role to play in facilitating sustainable development, with an overall objective of promoting sustainable travel choices. However, it also states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 3.28 As already stated, the site is well located in terms of access to public transport choices, jobs and services, where there is less need for a car. Even so, the proposed development has sought to meet the Council's suggested residential parking standards with the provision of 3 car parking spaces provided on site. For locations within zone 2, as set out the Revised Parking Standards and Design SPD, 2 bedroom houses are required to provide 1.5 spaces, meaning an overall requirement of 3 for the proposed development. It should also be noted that there is also on-street parking available.
- 3.29 The proposal complies with this requirement.

AFFORDABLE HOUSING

- 3.30 The Council's policy on affordable housing on sites proposing less than 15 dwellings is set out under DM6 of the SDPD. On sites of between 1-4 dwellings, it states that "*a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough*". The Council's adopted supplementary planning document on Affordable housing provides further guidance on how a commuted sum should be calculated, taking account of the amount that a registered provider would normally be able to fund, equating to 50% of the market value.
- 3.31 Based on the proposed development, which would result in a net gain of 1 dwelling, a commitment of £16,300 as a contribution towards affordable housing is proposed. Together with the RSL purchase price, this represents 9.9% of the GDV, so just shy of the normal 10% requirement.



ECOLOGY AND TREES

- 3.32 The Council's Core Strategy, Policy CS36, requires development to *"retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes"*. In order to address this requirement, an ecological survey has been prepared by Arbtech to assess whether the site holds any ecological value. It found that the site has relatively low ecological value, however it does recommend that further survey would be required to confirm whether or not the site contains any bats, as it was found to be potentially suitable as a roost.
- 3.33 The surveys are to be carried out at the earliest opportunity, which in this case will not be until at least May, which is the start of the optimal survey period for bat activity. As this potentially delays a decision being made until that time, it is accepted that a condition could be applied to ensure mitigation is in place for a worst case scenario, unless other proven to not be necessary.
- 3.34 Trees are covered by a separate policy within the Core Strategy (Policy CS38), stating that *"Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal"*. As the site is void of any trees, the proposed development will not result in any loss in this respect. Accordingly, the proposed development satisfies the requirements of the Development Plan.



4 SUMMARY & CONCLUSIONS

- 4.1 The submitted planning application seeks to secure repair and restore No.82 Star Road, which is Grade II listed. To achieve this aim, discussions have been held with RBC, with agreement made at the pre-application stage that the works would need to be financially viable. The proposed development puts forward a scheme that will restore the listed building and replace existing poorly realised extensions, to secure the properties optimal viable use as a dwelling.
- 4.2 As this alone does not make the proposed development viable, it is also proposed to construct a new detached dwelling in the garden. Although it has been identified through the assessment of the proposal that the new house will have a moderate impact on the setting of the listed building, it is considered that its setting has already been eroded to the extent that this no longer forms part of the buildings heritage significance.
- 4.3 In addition, the site lies within flood zone 3a where it is potentially vulnerable to a flood event. To address this concern a flood risk assessment was undertaken and confirms that the new dwelling can be constructed above predicted flood levels. In addition, where practicable, flood resilience measures are to be incorporated to make the property less vulnerable.
- 4.4 Other considerations have also been considered, such as the impact on the character of the area, neighbouring amenity, parking, ecology and trees. In our opinion, none of these matters prevent the grant of planning permission.
- 4.5 The key issues therefore mainly fall on the impact of the proposed development on the significance of the listed building and flooding. However, these impacts are not severe and given the benefits of repairing and restoring the listed building, it is our opinion that the public benefits outweigh any harm.
- 4.6 As such, in having regard to the material planning considerations cited within the application, the proposals comply with the relevant development plan policies and with central government advice in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. In our judgement, no other material considerations weigh against it. Accordingly, we recommend that the application for planning permission be approved.