

PLANNING, DESIGN & ACCESS STATEMENT

**‘CHANGE OF USE’ FROM A DWELLING (CLASS C3) TO 7 PERSON HOUSE IN MULTIPLE
OCCUPATION (SUI GENERIS) AND ASSOCIATED WORKS**

AT

11 NEWCASTLE ROAD, READING, RG2 7TN



Report Ref: 3158/PDAS

August 2024

Prepared by:

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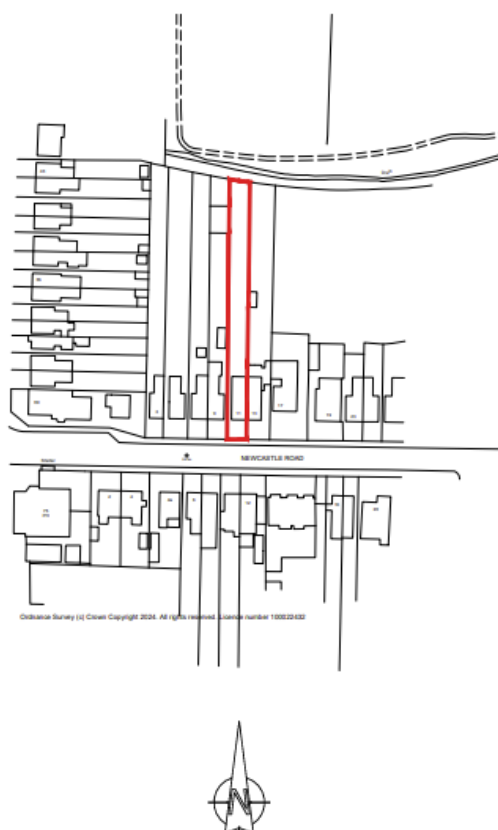
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1. INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been prepared by Ian Sullivan Architecture Ltd (ISA Ltd) on behalf of the applicant, Brett Property, in respect of the site known as 11 Newcastle Road, Reading, RG2 7TN.
- 1.2 The proposals involve 'Change of use' from a dwelling (Class C3) to 7 person house in multiple occupation (Sui generis) and associated works.
- 1.3 This statement is submitted in support of an application for full planning permission and should be read in conjunction with all plans produced by Ian Sullivan Architecture Ltd.
- 1.4 In addition to the submitted plans, CIL form 1 is duly completed.
- 1.5 This statement also provides a summary of relevant planning policy and the case for the development.
- 1.6 A previous planning application proposing a 2-storey rear extension was granted planning consent on the 12th July 2024, under application reference 240693.
- 1.7 This HMO application seeks to incorporate the 2-storey rear extension proposals as part of the approved application as mentioned above.



Site Location Plan

2. THE SITE & LOCAL CONTEXT

- 2.1 The site amounts to 513.3m² and is located on the northern side of Newcastle Road.
- 2.2 The existing property is a semi-detached dwelling constructed of facing brickwork and render with concrete roof tiles. The property is 2.5 storeys in height comprising ground, first and second floor levels.
- 2.3 The property is in disrepair and neglected, requiring renovation works to upgrade both internally and externally.
- 2.4 There are existing residential properties adjacent and opposite, all well established. The surrounding area is predominantly residential with a mixed character. There are several HMO properties currently within Newcastle Road.
- 2.5 The surrounding properties comprise of semi-detached and detached dwellings consisting a mix of facing brick and render.
- 2.6 Pedestrian and vehicular access is served off Newcastle Road.
- 2.7 The site has a slightly sloping topography between the front and rear of the property.
- 2.8 The application site is bounded to the south, east and west by residential properties. North-east of the application site is public open space known as Cintra Park.

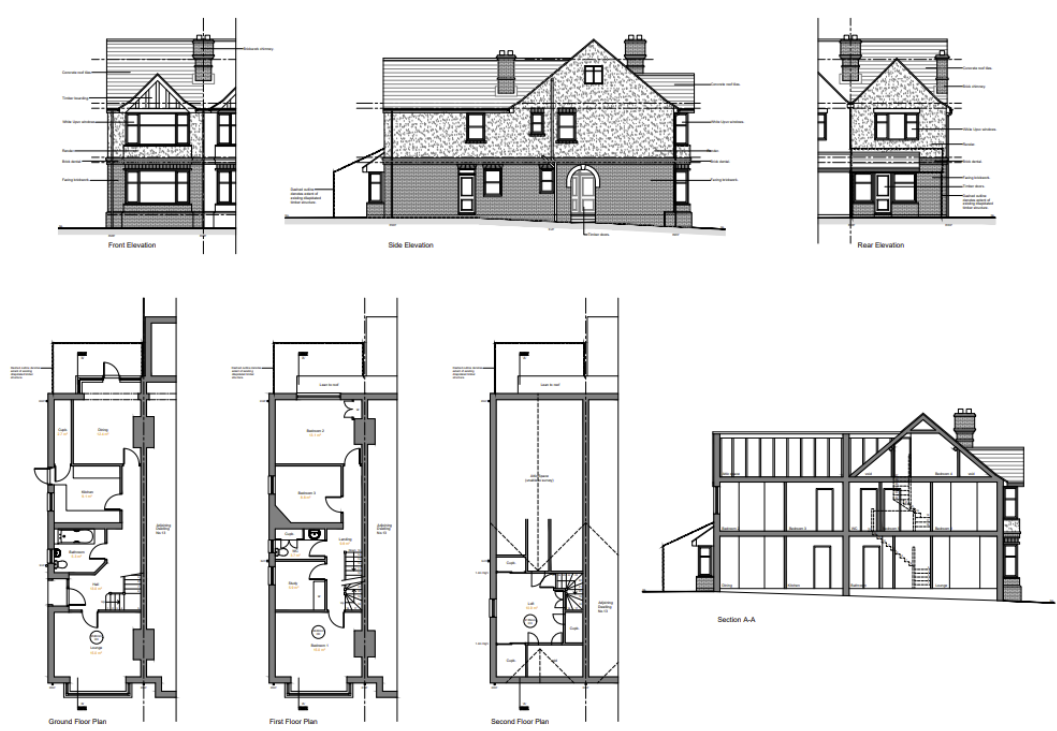


Existing Site Plan

2.9 Existing floor areas:

Existing Internal Floor Areas	
Ground Floor	57.5m ²
First Floor	56.3m ²
Second Floor	10.9m ²
Total	124.7m²

2.10 Existing Floor Plans and Elevations



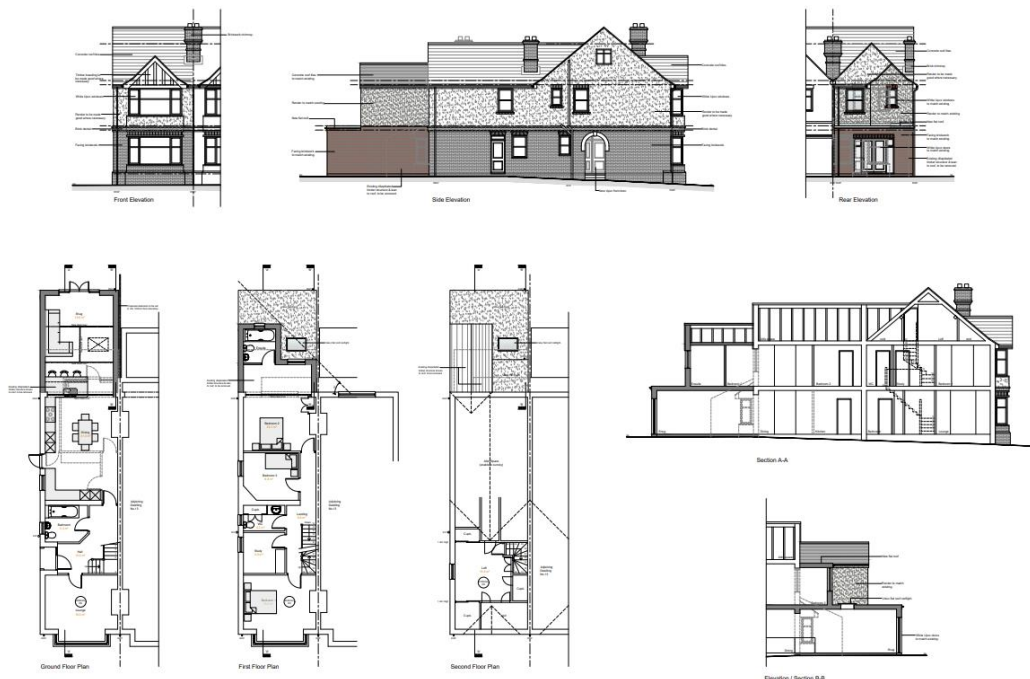
Existing Floor Plans and Elevations

Approved 2-Storey Extension

2.11 The plans below show the approved 2-storey rear extension, recently consented under application 240693 on 12th July 2024.



Approved Site Plan (Consented under application 240693)



Approved Floor Plans and Elevations (Consented under application 240693)

3. PHOTOGRAPHS AS EXISTING

3.1 Current condition of the existing property.

External Photographs:



Front of property.



Front of property.



Side of property.



Side of property.



Side of property.

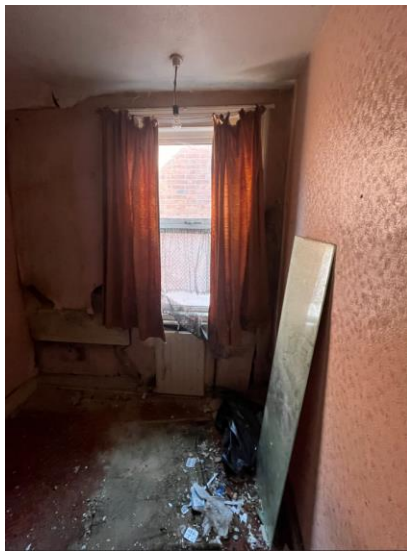


Rear of property.



Rear of property.

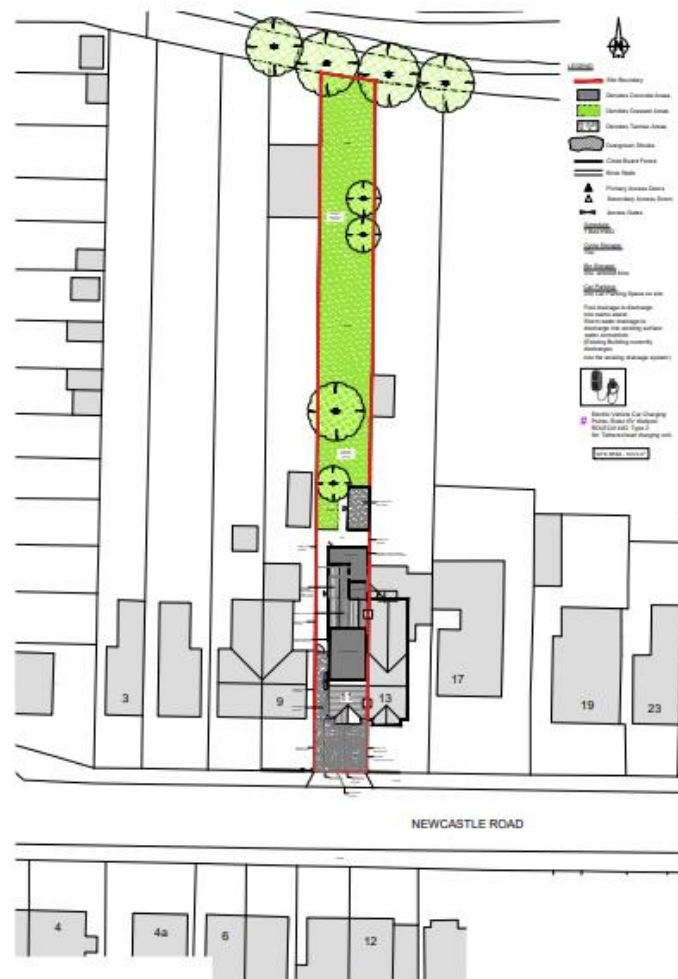
Internal Photographs:



The photographs above clearly demonstrate the property requires renovation works.

4. DEVELOPMENT PROPOSAL

- 4.1 The applicant is seeking full planning permission proposing 'Change of use' from a dwelling (Class C3) to 7 person house in multiple occupation (Sui generis) and associated works.
- 4.2 This HMO application seeks to incorporate the 2-storey rear extension proposals as part of the approved application reference 240693.



Proposed Site Plan

- 4.3 This submission is supported by the above Proposed Site Plan, which identifies the following: -

- The existing and proposed development in the vicinity of the Application Site;
- Primary and secondary access doors serving the HMO's;
- Existing close board fencing to be retained on the north, east and western boundaries;
- Metal entrance gates and 1.1m high brick walling to be removed from the southern boundary;
- 2 no. parking spaces provided + 1 no. electric vehicle charging point;
- New patio constructed and lawn area reinstated to rear garden;
- Bin and cycle storage.

Internal Layouts

- 4.4 The scheme proposes a change of use to HMO occupancy comprising 7 no. bedrooms. The layouts have been carefully designed and laid out within the building perimeters to ensure satisfactory living conditions for new residents, whilst also maintaining the amenity of surrounding buildings.

Ground floor level comprises a communal open plan kitchen and dining area + bedrooms 1, 2 and 3, each with ensuite facilities.

First floor level comprises bedrooms 4, 5 and 6, all with ensuite facilities.

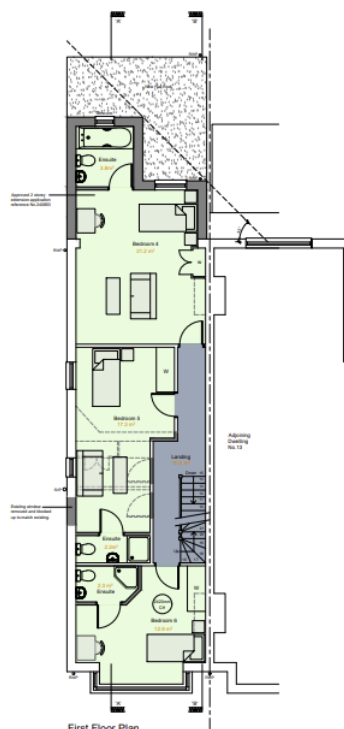
Second floor level comprises bedroom 7 with ensuite facilities.

The bedroom sizes provide usable internal floor space and benefit from adequate external windows to allow natural daylight / sunlight into the rooms. Sufficient communal space is provided by way of the good-sized open plan kitchen and dining area.

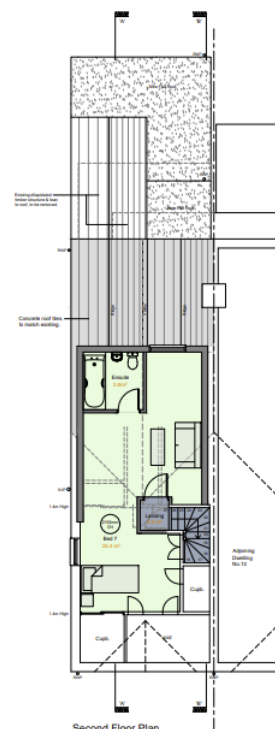
The room sizes comply with the Nationally Described Space Standards to ensure sufficient living conditions for any future occupants.



Proposed Ground Floor Plan.



Proposed First Floor Plan.



Proposed Second Floor Plan.

4.5 Internal Floor Areas:

Schedule – 7 no. HMO's	
Room	Internal Floor Area
1	13.3m ²
2	10.7m ²
3	10.6m ²
4	21.2m ²
5	17.3m ²
6	12.9m ²
7	25.4m ²

Communal Areas	
Ground Floor	39.4m ²
First Floor	10.0m ²
Second Floor	3.0m ²

Appearance

4.6 The external fabric of the building will remain as existing where possible. Design features include: -

- Existing render and timber boarding to be made good, where necessary;
- Facing brickwork to match existing;
- Concrete roof tiles to match existing + new flat roof system;
- Introduction of flat roof dormer to rear elevation, constructed of composite cladding;
- White UPVC windows to match existing and white UPVC doors.



Proposed Elevations



Proposed Elevation / Sections

- 4.7 Extensions to a house will be acceptable where it respects the character of the house in terms of scale, location, materials and design and respects the character and pattern of neighbouring properties and the street as a whole in terms of scale, location, materials and design and any important existing building line.
- 4.8 The proposals will be sympathetic and in keeping with the general aesthetic of the existing property and local area. The property is currently in disrepair and neglected, requiring renovation works to upgrade internally and externally. The proposals involving refurbishment will improve the appearance of the front and rear elevations and provide a low maintenance building.
- 4.9 Extensions are considered proportional to the property and the site as a whole, which has a lengthy rear garden. The design of the first floor extension minimises the impact on either neighbouring properties in terms of scale. The proposed extensions will not be visible from the street and therefore have minimal impact on the character of the wider area.

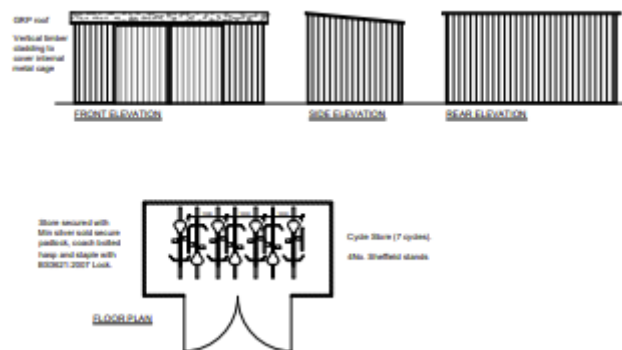
Access and Parking

- 4.10 The existing access is served off Newcastle Road. There is currently 1 parking space on the site, however 2 parking spaces are proposed under this application to serve the HMO.
- 4.11 The proposals involve removing the existing metal gates and 1.1m high brick wall to the southern boundary to create a wider vehicular access, together with the removal of overgrown shrubs, allowing sufficient parking space for 2 vehicles at the front of the site. An electric vehicle charging point will be provided as part of the proposals.
- 4.12 Having regard to the sustainable location of the site, it is considered that minimal car parking is required. In accordance with the Council's adopted Parking Standards and Design SPD, a 7 bedroom HMO is required to provide a minimum of 2 parking spaces in order to comply.

- 4.13 The site is in a sustainable location and is accessible by alternative modes of transport. The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. This zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.
- 4.14 The nearest bus stop is located on Newcastle Road (less than a minute away) and Reading Railway Station is approximately 2 miles away. A convenience store is approximately 1 minute walk away. There is a large green public open space known as Cintra Park a few minutes' walk away.

Cycle Storage

- 4.15 Overgrown shrubs at the rear of the property are to be removed and a secure timber clad store for 7 no. cycles provided.



Proposed Cycle Storage

Waste Management

- 4.16 A bin storage area providing space for 3 no. wheelie bins is located at the front of the property. Waste management and recycling will be collected by a Private Management Company.

Rear Garden Amenity Space

- 4.17 The property features a good-sized (long) rear garden. The overgrown shrubs are to be removed and a new patio area constructed. The large lawn area is to be reinstated, providing a visually improved appearance and garden amenity for future occupants.

Flood Risk and Drainage

- 4.18 The Application Site is located within Flood Zone 1 and is therefore at minimal risk from flooding. Neither would the site increase the risk of flooding elsewhere.
- 4.19 Foul drainage to discharge into existing mains sewer. Storm water drainage to discharge into existing surface water connection.

4.20 Comparison of Floor Areas:

- Existing floor areas of 11 Newcastle Road: -

Existing Floor Areas	
Ground Floor	57.5m ²
First Floor	56.3m ²
Second Floor	10.9m ²
Total	124.7m²

- Consented floor areas of the 2-storey extension approved under application 240693: -

Consented Floor Areas - EXTENSION	
Ground Floor	83.9m ²
First Floor	68.3m ²
Second Floor	10.9m ²
Total	163.1m²

- Proposed overall floor areas of the 7 bedroom HMO as now submitted: -

Proposed Floor Areas - HMO	
Ground Floor	80.4m ²
First Floor	69.9m ²
Second Floor	32.2m ²
Total	182.5m²

Permitted Development

- 4.21 Permitted development is allowed of rear dormers built under permitted development rights amounting to 40m³.
- 4.22 The proposed flat roof dormer is under the criteria laid out at 39.96m³.
- 4.23 The limits are currently 40m³ for terraced houses and 50m³ for both detached and semi-detached houses.
- 4.24 Materials to be similar in appearance to the existing house.
- 4.25 No part of the extension to be higher than the highest part of the existing roof. Roof extensions to be set back at least 20cm from the original eaves measured along the roof plane. The roof enlargement cannot overhang the outer face of the wall of the original house.

5. PLANNING POLICY

- 5.1 Relevant Planning Policy and Guidance Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 5.2 Planning Policy relevant to this small-scale development proposal is contained within: -
- [National Planning Policy Framework December 2023 \(NPPF\)](#)
- 5.3 The National Planning Policy Framework (NPPF) revised by the government in December 2023 is an important guide in the preparation of neighbourhood plans. The following paragraphs of the NPPF are considered especially relevant in the context of this Design and Access Statement:
- Rural Communities
 - Community Facilities
 - Local Green Spaces
 - Good Quality Design
 - The Natural Environment
- 5.4 The NPPF states that, at its heart, is the presumption in favour of sustainable development (Paragraph 10). In seeking to achieve this, the NPPF stresses that it does not change the status of the Development Plan as the starting point for decision making (Paragraphs 11 and 47).
- 5.5 In terms of decision making, the NPPF requires that Local Planning Authorities approach decisions on proposed development in a positive and creative way. This includes working proactively with applicants (including through their agents) to secure developments that will improve the economic, social and environmental conditions of the area (Paragraph 38).
- 5.6 Paragraph 11 emphasizes that proposed development that accords with an up-to-date Local Plan should be approved without delay, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. The NPPF itself is a material consideration.

For plan-making this means that:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The Reading Borough Local Plan 2019 accepts that they cannot demonstrate an up-to-date supply of deliverable housing sites and therefore, is out of date.

- Paragraph 1.2.2 Reading Borough Local plan 2019 states ‘itself was home to 155,700 people at the time of the 2011 Census, and this was estimated to have risen to 160,800 in 2014. Whilst, in common with most areas, there is an ageing population, Reading nonetheless has a younger population profile than many of its neighbours. Given the urban nature of Reading, it is unsurprising that it ranked fourth in the South East for population density at the time of the 2011 Census, with 38.5 people per hectare. Affordability of housing is an increasingly critical issue, with rising house prices and rents putting housing beyond the reach of many of our residents’.
- HMO accommodation provides tenants with the chance to live in desirable locations at a more affordable price point. Sharing living spaces and splitting bills can help individuals save money while still enjoying a comfortable living environment.

- 5.7 The NPPF confirms the Government’s objective of significantly boosting the supply of homes. This is seen in the context of ensuring that a sufficient amount and variety of land come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay (Paragraph 60).
- 5.8 Paragraph 70 makes specific reference to small to medium sized sites can make an important contribution to meeting the housing requirements of an area because they can be built out relatively quickly.
- 5.9 Paragraph 124d states to promote and support development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 5.10 Paragraph 131 stresses that good design is a key aspect of sustainable development. The NPPF also stresses that planning permission should be refused for poor design (Paragraph 139).
- 5.11 Paragraph 135 seeks to achieve well-designed places. It requires that both decisions should ensure that developments: -
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.12 The Revised NPPF refers to supplementary planning documents such as design guides and codes as being a useful visual tool. It stresses that the level of detail and degree of prescription should be tailored to the circumstances of each place and should allow a suitable degree of variety where this would be justified (Paragraph 133).

- **Reading Local Plan 2019**
 Policy CC1 – Presumption in Favour of Sustainable Development
 Policy CC2 – Sustainable Design and Construction
 Policy CC3 – Adaption to Climate Change
 Policy CC5 – Waste Minimisation and Storage
 Policy CC6 – Accessibility and the Intensity of Development
 Policy CC7 – Design and the Public Realm
 Policy CC8 – Safeguarding Amenity
 Policy EN12 – Biodiversity and the Green Network
 Policy H8 – Residential Conversions
 Policy H9 – House Extensions and Ancillary Accommodation
 Policy H10 – Private and Communal Outdoor Space
 Policy TR3 – Access, Traffic and Highway-Related Matters
 Policy TR5 – Car and Cycle Parking and Electric Vehicle Charging
- **Supplementary Planning Guidance**
 Design Guide to House Extensions (2021)
- **Revised Parking Standards and Design**
 Supplementary Planning Document (2011)
- **Residential Conversions**
 Supplementary Planning Document (2013)
- **Houses in Multiple Occupation**
 Management pack September 2018
- **Technical Housing Standards**
 Nationally Described Space Standard

Revised Parking Standards and Design – Supplementary Planning Document (2011)

- 5.13 Houses in Multiple Occupation (HMO's) require a minimum of 0.25 parking spaces per bedroom.

	Residential Parking Provision			
	Zone 1	Zone 2	Zone 3	Zone 4
Residential				
C3 Retirement Home with Warden (spaces per individual units)	0.5 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff	1 + 1 space on site for staff
C3 Dwelling Flat 1-2 bed	0.5	1	1.5	1.5
C3 Dwelling Flat 3+ bed	1	1.5	2	2
C3 Dwelling House 1 bed	0.5	1	1	1
C3 Dwelling House 2 bed	1	1	1.5	2
C3 Dwelling House 3 bed	1	2	2	2
C3 Dwelling House 4+ bed	2	2	2	3
Visitor Parking	0	1 space per 10 dwellings (Flats only)	1 space per 4 dwellings (Flats only)	1 space per 4 dwellings (Flats only)
Houses in Multiple Occupation (HMOs)	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**	0.25 per bedroom**

- For a retirement village, parking requirements will be determined separately.
- Adopted Core Strategy Policy CS18 on residential conversions refers to the need for the provision and location of adequate on-site car parking
- ** Occupiers will not be entitled to on-street car parking permits. Where planning permission is required for small HMOs falling within the C4 Use Class, this standard will apply to both C4 HMOs and Sui Generis HMOs.

5.14 STANDARDS FOR HOUSES IN MULTIPLE OCCUPATION (Shared Houses and Houses converted into Bedsits)

In such houses sleeping rooms will normally be for the exclusive occupation of individual tenants but in most cases there will be some sharing of amenities. This is most commonly a bathroom, toilet, kitchen, dining facilities and sometimes a communal lounge.

MINIMUM SPACE STANDARDS FOR LETTING ROOMS

One room Single person accommodation

Where a shared living room of adequate size* is provided in the property:	7.5m ²
Where there is no shared living room:	10m ²
Where cooking facilities are provided in the room:	13m ²

One room Two person accommodation

Where a shared living room of adequate size is provided in the property:	10m ²
Where there is no shared living room:	14m ²
Where cooking facilities are provided in the room:	16m ²

*Common Living Rooms

Used by 1-5 persons	10m ²
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For every additional user an additional 2m² floor area is required.

AMENITY STANDARD

Kitchen Facilities

Where separate occupancies do not have their own discrete food preparation facilities (Self-Catering occupancies), shared or communal kitchens must be provided.

Minimum sizes for Shared or Communal Kitchens:

Used by 1 – 5 persons:	7.5m ²
For each additional person:	1.5m ²

Personal Washing Facilities

Each separate letting room may be provided with its own bath or shower as an ensuite facility.

Baths and shower trays should be of sufficient size to enable safe and convenient use by occupiers.

MEANS OF ESCAPE IN CASE OF FIRE

Premises shall be provided with adequate means of escape from fire and other fire precautions necessary to reduce the corresponding hazard to an acceptable level.

In specifying what fire protection measures are required regard shall be had to:

- Any advice and guidance provided by the local Fire & Rescue Authority.
- Current Building Regulations.
- Applicable British Standards.
- Other guidance issued or endorsed by the relevant Govt. Department.

An individual specification for means of escape in case of fire and other fire protection measures will be issued in respect of each house in multiple occupation. This will normally follow consultation with Wiltshire Fire & Rescue Service.

MANAGEMENT REQUIREMENTS

The person managing the premises is responsible for its proper management to ensure that it remains safe and suitable for occupation by tenants at all times.

- Ensure that means of escape, fire doors, fire alarms and fire fighting equipment are maintained in good order and repair and kept free from obstruction.
- Keep shared facilities and common parts clean and in good repair (i.e. Bathrooms & toilets, cookers & fridges, staircases, landings carpets etc.)
- Maintain the gas and electrical installations in safe working order. Provide gas safety & electrical certificates.
- Keep all units of accommodation in good repair and clean condition.
- Keep facilities for heating the house and provision of hot water in good order.
- Maintain gardens and outbuildings in good order and good repair.
- Make suitable provision for the storage of refuse and provide ready access for its collection. (Including recyclables)
- Display a notice in the property giving the name & address of the person responsible for managing the house.

NOISE AND DISTURBANCE

In terms of noise and disturbance there is no evidence to suggest that a HMO for up to 7 individuals would create significantly greater levels of noise than a fully occupied 4 bedroom family house (bedrooms at ground, first and second floor).

6 CONCLUSIONS

- 6.1 In conclusion the balance of material planning considerations clearly confirms that the proposed 'change of use' to form a 7 person house in multiple occupation (Sui generis) and associated works is acceptable in-principle.
- 6.2 The principle has been established under previous HMO application sites such as 13, 19, 25 & 29 Newcastle Road and the recent application won on appeal at 27 Newcastle Road (Appeal Ref: APP/E0345/W/21/3279894 / LPA Ref: 210127).
- 6.3 The proposals accord with both national and local planning policy, in particular the policies of the National Planning Policy Framework and the adopted Reading Borough Local Plan.
- 6.4 The application proposal will assist in addressing Reading's housing land shortfall in accordance with the thrust of the advice provided within Paragraph 60 of the NPPF:

"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a five-year supply of deliverable housing sites".

- 6.5 With rising property prices and increased demand for affordable housing, HMOs provide a viable solution by utilising existing homes more efficiently.
- 6.6 The room sizes comply with the Nationally Described Space Standards to ensure sufficient living conditions for any future occupants.
- 6.7 We believe the proposals should be supported on the basis they are sympathetic to the existing building and neighbouring properties. The proposals will improve the appearance of what is currently a property in disrepair and neglected, whilst enhancing the overall street scene. There will be no unacceptable impact on surrounding residential properties.
- 6.8 The intention is that the proposed works will complement, rather than detract from its setting and we would therefore submit that the application proposal complies with Policy CC7 (Design and the Public Realm) of the Local Plan.
- 6.9 In conclusion, we would therefore submit that the proposal is acceptable in all respects and request that full planning permission is granted subject to conditions.

Ian Sullivan

August 2024