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7 Glebe road
Reading
RG2 7AG
[REDACTED]

02 October 2024

Sent by 1st class post & email

URGENT FAO: Reading planning committee

RE planning application: PL/24/1083

Site address: 11 Glebe Road, Reading, RG2 7AG

Proposed Works: Application for the conversion of the existing building with extensions into one dwelling and 8 flats

Dear Sir/Madam

Please find enclosed my formal objection to the above proposed development at 11 Glebe Road, RG2 7AG, Planning Application No. PL/24/1083, PP-13330496, proposing conversion of the existing building with extensions into one dwelling and 8 flats.

My objections are eight-fold and rely on the following detailed evidence, demonstrating that:

- 1) The development clashes with both local and national planning policies.**
- 2) There is a distinct lack of need for this type of development in this area.**
- 3) The proposed development disproportionately overshadows, and increases the loss of privacy for several neighbouring properties.**
- 4) The proposed development significantly harms the host building which is integral to the Christchurch conservation area**
- 5) The proposed development Is detrimental to the conservation area.**
- 6) The proposed development is detrimental to local utilities.**
- 7) The proposed development disproportionately impacts neighbouring amenities. (TR3 – Mitigating Transport Impacts)**
- 8) The proposed development is of a very poor quality and size.**

1. The development clashes with both local and national planning policies.

1.1 When comparing the proposed development to the Reading Borough Local Plan regulations adopted in November 2019, it becomes very clear that this development is unsuitable and detrimental to the principles of the established conservation area and the community's well-being.

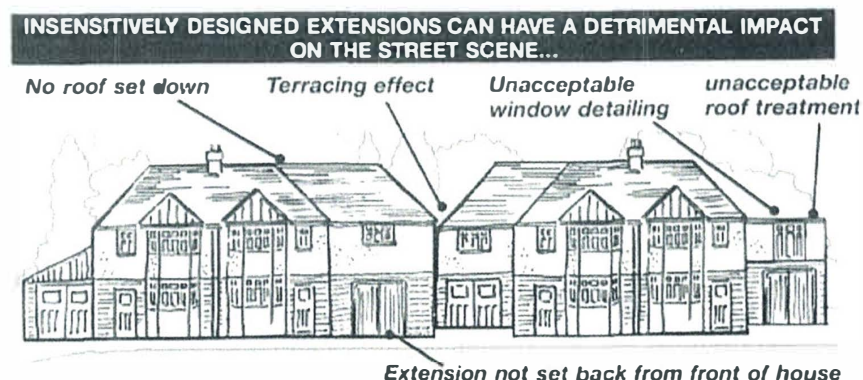
1.2 Disproportionately large and overbearing design

Given the existing size of the building, any proposed extension would have to be proportionate in both size and design. The proposed development is of very poor quality, designed to maximise the number of units rather than adhere to the principles of good design as stated in Reading borough council's planning guide. The proposal neither complements, nor adds to the conservation area and is contrary to Reading borough council's stated aims of providing both, which sets clear standards for extensions and states that extensions:

- should be smaller than the main building and;
- must be set back to avoid negatively impacting neighbouring properties

The proposed development is neither set back, nor smaller than the main building.

1.3 The figure below is an extract from the planning extensions design guide used by the Reading Borough council and clearly highlights what is considered unacceptable. This proposal fails to adhere to this guide.



1.4 The proposal would also set a very detrimental precedent in a conservation area rendering the whole purpose of a conservation area otiose.

2. There is a distinct lack of need for this type of development in this area.

- 2.1 The borough of Reading has a disproportionately large number of 1-2 bedroom flats when compared to the national average. Whilst it has a large transitional population driven by the good educational facilities, there are few family homes within the centre or immediate surrounding areas which results in many families having to reside much further out of Reading resulting in significant commuting for schooling and other facilities, which in turn results in a much higher CO2 footprint. The proposed development would only exacerbate that problem.
- 2.2 Moreover, given the proposed development fails to adhere to any of the planning principles as set out in the local planning guide, and whilst these objections are significant, it is recognised that a sympathetic development comprising a maximum of 3 family type units of a town house design, integrated into the main building, would serve both the conservation area, the community and provide much needed family homes to the local area.
- 2.3 The introduction of high-density, small-unit flats is inconsistent with the intended purpose and character of Christchurch conservation area and would significantly alter the fabric and community of the neighbourhood.

3. The proposed development disproportionately overshadows, and increases the loss of privacy for several neighbouring properties.

- 3.1 The proposed plan is in breach of CC8 Safeguarding amenity, Reading Borough Local plan.
- 3.2 As can be seen from the below figures, which are directly copied from the planning application, the proposed development would dwarf the neighbouring property at 9 Glebe road, and would have a significantly harmful impact in terms of light obstruction, overshadowing, and overlooking several gardens and windows and would be so big as to distract from the conservation area itself and the Church which is at the epi-centre of the conservation area.



3.3 The planning proposal would also:

- i. Reduce natural light to both the neighbouring gardens and properties
- ii. Significantly increase noise and disturbance
- iii. Significantly reduce the separation between neighbouring properties, especially number 9, falling well below the recommended 20-metre back-to-back distance specified in CC8 (Safeguarding Amenity) policies of the Reading Borough Council Local Plan
- iv. The proposal would require a significant number of windows, many of which would overlook existing dwellings leading to a significant breach of privacy for the neighbours and therefore reduce many neighbours privacy with significant 'overlook'. Reading's planning policy states that windows facing neighbours should be avoided and the existing proposal fails to comply with this guidance.

4. The proposed development significantly harms the host building which is integral to the Christchurch conservation area

4.1 Historical significance of the house within Christchurch conservation area

Whilst the existing building is the largest on the road, it is also of significant character and age to complement Christchurch conservation area where it's impact is softened by the numerous mature trees and old garden hedges reflecting both the origin & character of the house as a former family home. To disproportionately change the design or to add to the house would change it to such an extent that it would be unrecognisable and no longer complement the conservation area, or the church it currently neighbours.

4.2 Overdevelopment in a conservation area,

The proposed development would swamp the host building which is locally of significant architectural and historical value and would therefore result in the diminution of the conservation area both in terms of loss of historical value and damage the visual aesthetics of the conservation area.

- 4.3 By harming the host building, which is a building of local interest, it also contravenes the specifications of local policy NE1 (Protection of the Natural Environment).

5. The proposed development Is detrimental to the Christchurch conservation area.

- 5.1 The proposed plan is in breach of CC8 Safeguarding amenity, Reading Borough Local plan:

- 5.2 in 2019 Reading Borough Council declared a '*Climate Change Emergency*' and set guidelines for any new developments which should include detailed measures to reduce any environmental impact. The proposed plan fails to specify sustainable materials, landscaping, or surface solutions that would minimise environmental impact (CC3 – Adaptation to Climate Change).

- 5.3 The proposed development does not outline solutions for decentralised energy (CC4 – Decentralised Energy) and;

- 5.4 The proposed development does not provide sufficient waste storage to facilitate recycling or reduce the local government target of reaching 'Net 0' (CC5 – Waste Minimisation and Storage) and therefore fails to provide sustainable proposal.

- 5.5 The proposed development does not provide any decarbonisation plan, quite the opposite, page 15 of the sustainability report provided by 'Cherryfield Ecology', commissioned by the developers, makes clear that there is a statutory requirement for new developments to:

*"provide a 10% increase for each unit type present is required to meet the minimum statutory requirement. The proposed development will result in a **-4.29% net loss** in Habitat Units, therefore, does not meet this requirement"*

- 5.6 The sustainability report concludes:

"In order to meet the minimum requirement of a 10% net gain for Habitat Units and satisfy the trading rules, a further 0.56 units of

Medium Distinctiveness Woodland habitat type (or a higher distinctiveness habitat type) are required"

The developer offers no solution to increase the woodland habitat. It later becomes clear in the report why this is not possible - given the vast scale of the proposed development.

- 5.7 The sustainability report concludes that increasing the woodland area on site is not an option given the scale of the proposal and states:

"This is not possible on-site and off-site compensation will be required."

- 5.8 The development, fails to demonstrate that it would not harm the environment, and the report concludes it would lead to a significant loss of biodiversity. (in breach of EN12 – Biodiversity and the Green Network)

Therefore the proposed development would be in breach of both local and national planning policy as it would unequivocally harm the local wildlife and conservation area.

6. The proposed development is detrimental to local utilities.

- 6.1 The development, fails to demonstrate that the demand of local services is sustainable – (EN16 – Pollution and Water Resources). By way of example, there is no data showing that the local water and sewage network would remain within sustainable limits, that the extra effluent from ten extra dwellings would not harm the environment, or that it would not lead to 'overspill' as the proposal does not include a sustainable drainage plan.
- 6.2 Policy TR5 – '*Car and Cycle Parking*' provides that any new development should include charging points for electric vehicles for off-road parking spaces. Not only is the proposal deficient in the number of proposed allocated parking spaces, it does not include for any charging points for electric vehicles,
- 6.3 The same is true for the complete lack of sufficient bicycle storage.
- 6.4 Notwithstanding that the sustainability report makes clear that the proposed development (construction) would significantly disturb local wildlife, the neighbouring property (number 9 Glebe road) has already been identified as hosting a significant population of

protected bat species which has not been addressed in the report, nor how they would be protected.

- 6.5 The sustainability report also concludes that the proposed development would destroy part of the mature garden that includes protected trees. Under the guidelines of H11 (Development of Residential Gardens), such developments should only be considered if they focus on the provision of family-sized housing rather than small-unit dwellings.
- 6.6 Since the proposed development infringes on an established garden, it should have included a full landscaping plan which the developer has failed to provide.
- 6.7 The accompanying developers' '*Sustainable Design and Construction Statement*' is so vague and lacking in detail that it renders the statement vacuous. There are no details of proposed materials for the development. While the document references strategies and design choices, aimed at achieving a sustainable build, it does not outline specific measures or recommend particular technologies or explain how they aim to achieve this. Since there is a lack of planning and understanding on how to achieve this goal it is obvious that the developers will fail to comply with it's stated aims to adhere to the relevant sustainability policy.

7. The proposed development disproportionately impacts neighbouring amenities. (TR3 – Mitigating Transport Impacts)

7.1 Detrimental Impact on local traffic and transportation

The significant increase in number of dwellings on Glebe road would result in:

- i. Significant extra vehicle pollution
- ii. Significant extra noise
- iii. Significant strain on parking by both residents and resident visitors alike in an area which has already been identified by the local council as being a congested traffic zone.
- iv. The development would result in a significant increase in both short and long term vehicle movements which in turn would be detrimental to pedestrian safety in an area predominantly populated by children attending the local schools and nursery.
- v. The local road network (Glebe road is a small cul-de-sac) is not designed to handle traffic, let alone the significant additional traffic and parking demands that the proposed

development would bring. Reading Borough Council has already acknowledged serious problems related to local traffic in Reading East (Chapter 9.2.8: "*there is a serious local issue with car parking [...]*"), and this development, due to its excessive scale, will exacerbate the chronic lack of parking, complicating vehicle manoeuvring, and increase the risk to pedestrian safety.

8. The proposed development is of a very poor quality and size.

- 8.1 The proposal is overbearing in scale and excessively large, which will negatively impact the appearance of the conservation area and would contravene with Cross Cutting Policy CC7 (Design and the Built Environment) and H9 (Residential Design Standards).
- 8.2 The proposed parking spaces for both bicycles and cars are insufficient to meet the needs of the occupants. which provides for only 7 off-road parking spaces in breach of both local and national guidelines which require at least one parking space per unit.
- 8.3 TR1 (Sustainable Transport Networks) principles & guidelines require storage spaces for each individual dwelling. However, the planning application only provides for four bicycle storage spaces and therefore does not promote any form of sustainable transport.
- 8.4 The proposed development fails to address the realities of community living. In the Reading borough plan dated 2019, section 4.1.38 identified that:

"Most tensions can be avoided by careful design, siting and orientation of buildings and spaces, paying particular attention to those aspects which are most likely to cause issues (e.g. car parks, bin stores and noisy equipment)..."

And

"Bin and cycle storage should be of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access"

The planning proposal has not provided for separate driveway entries into, and out of the property or disabled access.

In summary,

The below figure shows in pictorial form several key issues which have not been addressed by the developers. It appears that this is a 'speculative' application without any significant thought or consideration as it does not follow in any significant way, or at all, either local or national planning policy.

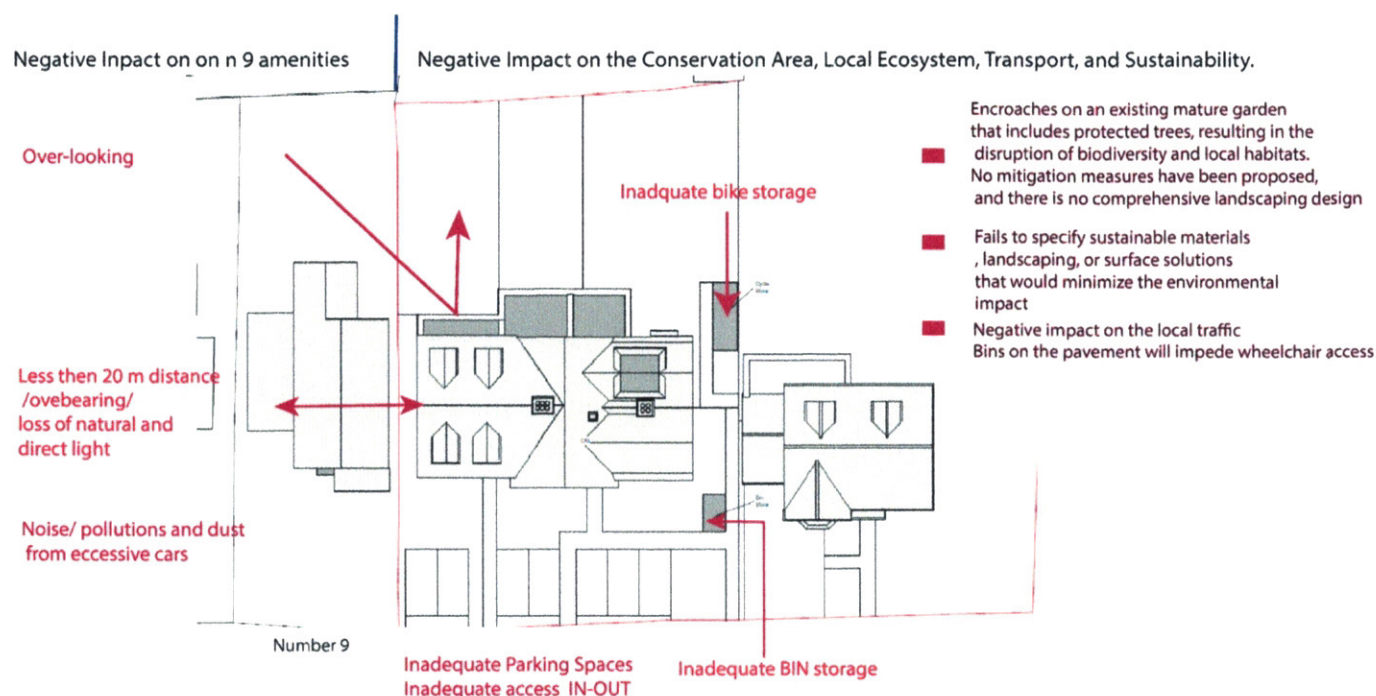


Figure 1. Visually depiction in broad lines the scale of objections to the proposed development.

Conclusion:

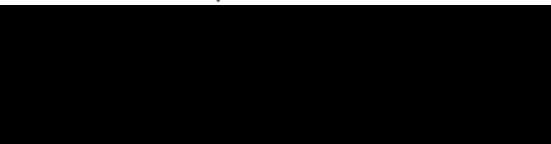
- i. The proposal lacks adequate provisions in several key conservation areas, including failure to protect or enhance local flora and fauna, failure to protect existing wildlife and protected species (like bats which have been recorded as living in the conservation area at neighbouring properties).
- ii. The proposed application fails to address or provide any sustainable development, or mitigate any environmental impact, and even by the developers own commissioned report, concludes that the development would in fact destroy local habitat which would not be able to be replaced locally.
- iii. The developers own sustainability report also concludes that the proposed development would increase CO2 emissions in breach of planning guidelines.

- iv. The proposed development, fails to meet local planning guidelines in several key areas, as it is neither sufficiently set back nor appropriately sized for the area in which it is proposed.
- v. The proposed development, fails to provide sufficient resident parking, bicycle sheds or charging points.
- vi. The proposed development fails to address highway safety for the local area which includes both nurseries and schools.
- vii. The proposed development, fails to address the increase in local traffic generation, the safety hazards, extra pollution or increase in CO2 in the local area.
- viii. The proposed development fails to address the loss of local habitat, flora and fauna, including several mature trees.
- ix. The proposed development, fails to provide adequate quality residences, instead proposing box like homes with poor lighting and layout, with an unusually high human density.
- x. The proposed development, fails to provide any disabled persons' access

It should be noted that a similar proposal was refused PP only a few years ago when the property was not even in the Christchurch conservation area. (Planning application 080022), indicating that a conversion of this proportion is not desirable in the current location. Now it is in the Christchurch conservation area, it would be incongruous to allow any development without addressing the needs of the local community and above objections.

As detailed above, given the serious adverse impact the proposed planning application would have, the planning application should be refused outright.

Yours faithfully



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