

DELEGATED APPLICATION REPORT

Ward: Redlands Ward

App Ref: PL/24/1054 Full planning permission

Address: 11 NEWCASTLE ROAD, READING, RG2 7TN

Proposal: Change of use from a dwelling (class c3) to 7 person house in multiple occupation (sui generis) and associated works.

Applicant: Mr Phillip Brett

Received date: 2024-08-14

Target Decision date: 2024-10-11 (EOT)

Case Officer: Marcelina Rejwerska

1. SITE DESCRIPTION

The application site comprises a two-storey semi-detached dwelling on the north side of Newcastle Road. The property is currently vacant and in poor condition from overgrowing vegetation. The property has a front garden and long narrow rear garden, which is currently inaccessible due to the dense overgrown vegetation. The surrounding area is predominately residential, with the Northumberland Avenue North Local Centre south of the site. The site is not within an Article 4 Direction Area.



Application site (left) as seen from Newcastle Road. Image taken from Google Maps on 10 October 2024.

2. PROPOSAL AND SUPPORTING INFORMATION

Planning permission is sought for the change of use from a dwelling (Class C3) to a 7-bedroom 7-person large HMO (Sui Generis) and associated works. At the time of this application, work has commenced on extensions to the property including a rear dormer being constructed under permitted development, and recently permitted rear extensions.



Proposed Floor Plans

2.1. Information Submitted:

- 3158-1001 Location Plan, dated July 2024
- 3158-1100 Rev A Existing Site Plan dated July 2024
- 3158-1101 Existing Floor Plans & Elevations, dated July 2024
- 3158-1121 Rev B Proposed Site Plan, dated July 2024
- 3158-1151 Rev C Proposed Floor Plans & Elevations, dated July 2024
- 3158-1155 Proposed Cycle Store, dated July 2024
- Received by the LPA on 1 October 2024

Design and Access Statement
Received by the LPA on 14 August 2024

3. RELEVANT PLANNING HISTORY

PL/24/0693 – Proposed 2-storey rear extension – Application permitted on 12/07/2024

4. CONSULTATIONS

The following were consulted:

- **RBC Transport Development Control**
 - The property is served via an existing access directly from Newcastle Rd. 2 parking spaces are to be created by removing existing metal gates, removal of boundary wall and landscaping to create a wider vehicular access. However, there is a telegraph pole on the property boundary with No 13 which has not been illustrated on plans and a utility cover in the footway. The extended access must have a minimum distance of 1m from the telegraph pole. Revised plans illustrating the width of the extended vehicle access in relation to the location of the telegraph pole and utility cover are required. A license will be required to undertake all works on the public highway, this includes the widening of an existing dropped kerb and reinforcing (if required) of the footway, this would be for Highways to determine. Should the telegraph pole require relocating then the cost would be fully met by the applicant.
 - Secure and covered cycle storage has been illustrated at the rear of the site, utilising Sheffield type stands. Storage will be accessed via the side of the property. Proposed provision is in excess of the standards and is deemed acceptable.



- Bin storage has been illustrated located at the side of the property, however this location would obstruct access to the rear garden area and cycle storage area. A storage area in the rear garden located at the rear of the site and brought to the front of the property to allow for kerb side collection would be appropriate but the location must not block access to parking spaces.
- **RBC Environmental Health**
 - As the communal area adjoins a neighbouring property then further information on the sound insulation performance of the separating wall will be required prior to planning permission being granted. The sound insulation performance should be demonstrated to be equal to or better than current building regulations standards for a party wall.
- **RBC Natural Environment** – No formal comments received.
- **GS Ecology** – Bat survey required due to proposed works to roof (dormer). Biodiversity net gain calculations requested to demonstrate how a net gain will be achieved.
 - *Officer note – bat survey could not be obtained as works to roof have already commenced.*

The following addresses were consulted by letter:

- 13 Newcastle Road, READING, RG2 7TN
- 12 Newcastle Road, READING, RG2 7TR
- 9 Newcastle Road, READING, RG2 7TN
- 10 Newcastle Road, READING, RG2 7TR

Letters of representation have been received as follows:

2 Objections, citing concerns relating to:

- Oversaturation of HMOs in the local area.
- Noise and disturbance.
- Potential for anti-social behaviour.
- Increased pressure on local resources such as parking, waste management.
- Harm to appearance of the street due to number of bins stored on the frontage.
- Loss of family housing.
- Harm to the character of the street.
- Increased pressure for on-street parking.

5. LEGAL AND PLANNING POLICY CONTEXT

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'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

National Policy and Guidance

National Planning Policy Framework
National Planning Practice Guidance

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC5: WASTE MINIMISATION AND STORAGE

CC7: DESIGN AND THE PUBLIC REALM

CC8: SAFEGUARDING AMENITY

EN12: BIODIVERSITY AND THE GREEN NETWORK

EN14: TREES, HEDGES AND WOODLAND
EN16: POLLUTION AND WATER RESOURCES
H1: PROVISION OF HOUSING
H8: RESIDENTIAL CONVERSIONS
H10: PRIVATE AND COMMUNAL OUTDOOR SPACE
TR1: ACHIEVING THE TRANSPORT STRATEGY
TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

SPD

Revised Parking Standards and Design (2011)
Residential Conversions (2023)

Equality Act 2010:

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

6. APPRAISAL

6.1. Land Use Matters

Policy H8 outlines the requirements for proposals to convert dwellings to HMO. The Residential Conversions SPD gives more context to this policy, especially with regard to densities of HMOs and converted dwellings in areas outside of an Article 4 Direction area.

Section 6 of the SPD states *“Outside the areas covered by an Article 4 direction relating to small HMOs, planning permission for a conversion of a dwellinghouse to flats or to a large HMO will not normally be granted where **any** (officer emphasis) of the following apply:*

- The proportion of houses within a 50m radius of the application site that are in use as HMOs or which have been converted to flats would exceed 50%;*
- The application is for an HMO and the area falls within the 30% most deprived areas in England according to the Indices of Multiple Deprivation; or*
- There is other evidence of dilution or harm of a mixed and sustainable community.”*

The density of dwellings within a 50m radius of the site is currently 27% (having assessed available sources) and would increase to 29% if this proposal were to be approved. While this is below the threshold as outlined above, this is still considered relatively high. The application site also ranks within decile 2 on the 2019 Indices of Multiple Deprivation, meaning the site is within 10-20% most deprived areas in England. Cumulatively, the local density of HMOs and the nature of the local area would contribute to the deterioration of mixed and sustainable communities.

The principle of the proposed change of use is, therefore, not accepted, as it does not accord with Policy H8 of the Reading Borough Local Plan and the supporting guidance within the Residential Conversions SPD.

6.2. Character and Design

Policy CC7 requires all development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

The case officer had initially requested that the rear dormer be removed from the proposal due to its poor design and negative contribution to the appearance of the property, but the agent has stated that these works have already commenced within the limits of permitted development for householders. No certificate of lawfulness was submitted or granted for these works, however, the dormer as measured would fall under permitted development. As such, while this is disappointing, there are no further comments to be made on the appearance of the dormer.

The proposal also includes paving of the entire frontage to provide 2no. off-road parking spaces. This area would exceed the limits of hard surface under permitted development. The extent of the hard surfacing and loss of the green frontage is considered harmful to the character of the property and the wider street scene, where the loss of green frontages contributes to the deterioration of the character of the area.

Overall, the proposal is not considered a positive contribution to the character of the local area, contrary to Policy CC7.

6.3. Residential Amenity

Policy CC8 requires all development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. The Residential Conversions SPD requires one communal room for every 4-6 bedrooms (depending on the size of the bedroom) to be provided, which will have acceptable amenity standards and appropriate access for all residents.

Future occupants

The proposal would result in the creation of a 7-bedroom property. There is no communal room proposed, as the Residential Conversions SPD specifies that kitchen/dining rooms are not considered communal amenity spaces. While all bedrooms meet minimum space standards, and some significantly exceed these standards, the lack of a communal amenity room is not acceptable. Only 3 out of the 7 bedrooms proposed significantly exceed minimum space standards, meaning that the other 5 residents would need one communal room for general enjoyment.

The stacking of rooms is also not ideal. Bedroom 7 in the loft has an ensuite above bedroom 5 which is likely to lead to noise disturbances to the occupants in room 5.

Neighbouring properties

Due to the minimal external alterations proposed, there are minimal concerns for the amenity of neighbouring residents. As standard for large HMOs, there is a concern with relation to the potential noise levels associated with the use of the communal areas and the impact on the adjoining residents. Had the application been recommended for approval, a condition would be recommended for acoustic insulation of the party wall.

Overall, the lack of meaningful communal amenity space internally makes the proposal in its current form unacceptable and contrary to Policies CC8 and H8.

6.4. Transport and Parking

Policy TR5 states *“Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public 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. Typically, this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide a parking provision of 0.25 parking spaces per bedroom. This equates to a total of 2 car parking spaces for the development. However, as previously stated, this is proposed at a detriment to the character of the property and the wider area through paving over of the front garden. This solution is, therefore, not considered acceptable.

6.5. Biodiversity and Landscaping

Policy EN12 requires that development on all sites should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible. This application is also subject to mandatory biodiversity net gain (BNG) under Schedule 7A of the Town and Country Planning Act 1990. The applicant has stated that the proposal is subject to the 'de minimis' exemption from mandatory BNG, however, as the proposal includes landscaping of the rear garden, the exemption is not considered relevant.

The rear garden at present is excessively overgrown to the point of inaccessibility. The proposal includes removal of the overgrown shrubs and replacement with predominately grass lawn. Although these habitats are not classified as priority habitats, they do possess some biodiversity value, and the proposed clearance is likely to result in a biodiversity net loss. Without the submission of biodiversity metric calculations, it is not possible to assess the impact on the biodiversity of the site.

7. CONCLUSION

The proposal would cause harm to the character of the local area and would provide inadequate living conditions for future occupants. The harm identified is considered to outweigh any public benefit of the proposal.

8. RECOMMENDATION

REFUSE

Due to the following reasons:

1. The proposal in principle would result in an excess of HMOs in an area falling within 30% of the most deprived areas in England according to the Indices of Multiple Deprivation (2019), and this combined with an already relatively high density of HMOs within a 50 m radius of the property, would lead to a further deterioration of mixed and sustainable communities in the immediately surrounding area, contrary to Policy H8 of the Reading Borough Local Plan 2019 and the Residential Conversions SPD 2023.
2. The proposed accommodation would fail to provide adequate communal space for future occupants due to the lack of a communal room to accommodate the number of occupants which would create unacceptable living conditions, contrary to Policies CC8 and H8 of the Reading Borough Local Plan 2019 and the Residential Conversions SPD 2023.
3. Insufficient information has been submitted to demonstrate how biodiversity net gain could be achieved on site, contrary to Policy EN12 of the Reading Borough Local Plan 2019 and Schedule 7A of the Town and Country Planning Act 1990.