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Mr Simon Dunn
The Planning Inspectorate
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18 October 2024

Your ref:	APP/E0345/W/24/3348748
Reading Borough Council ref:	240095
My ref:	1333

Dear Mr Dunn,

16A Kentwood Hill, Tilehurst, Reading, Berkshire RG31 6DE

Further to your letter and enclosures of 18 October the following are my comments upon the two representations and the items in the local planning authority's statement.

REPRESENTATION FROM FRANCISCO MEZA & MARIA KELLY

The representation appears to conflate the proposals under appeal with the potential purchase of Kentwood Close, the private road behind the appeal property. The proposed two houses at 16 Kentwood Hill will not impact Kentwood Close in any way other than their rear gardens backing onto it in exactly the same way as currently exists. This relationship will therefore remain unaltered.

REPRESENTATION FROM JESSICA LEVERETT

-1. Parking

The proposed parking spaces would be solely accessed from Kentwood Hill, as shown on the drawings. The proposals under appeal do not include any vehicular access from Kentwood Close.

-2. Traffic

The proposals under appeal include vehicular access only from Kentwood Hill, none from Kentwood Close. Therefore they could not generate traffic in Kentwood Close, which would remain as safe as currently exists for users of any age.

PLANNING AUTHORITY'S STATEMENT OF CASE

...

1.2. None of the Reasons for Refusal specifically referred to the *shape* [my emphasis] of the site, which is broadly a very slightly distorted rectangle nom.50.6 x 8.5m wide, amply suitable to provide generous outdoor private amenity space for the two proposed residential dwellings, as shown on submitted drawing 1333/3c. This replicates the configuration of arguably all of the neighbouring residential houses in both Kentwood Hill and Kentwood Close. It is unclear why the planning authority [LPA] have now brought site shape into question as a contributory reason for refusal.

4.2. Similarly, none of the Reasons for Refusal referred to detailing. It is presumed this is referring to architectural features, namely the traditional materials and constructions shown and stated on the submitted drawings. Again, it is unclear why the LPA have now brought detailing into question as a contributory reason for refusal. If there were any concerns on such matters the LPA could add an appropriate condition to an approval.

4.4. and 4.7. While the three parking bays clearly take up the majority of the frontage, the LPA have chosen to disregard the proposed soft planting indicated in front of the front bay, and the 'max.600mm high shrubbery' as annotated and shown on the submitted plans. It is incorrect and misleading to state that there is an '...inability to provide space in front of each dwelling other than for hardstanding', The Grounds for Appeal have already cited nearby examples of similarly apportioned front areas as being characteristic of the area.

4.6. The LPA's statement refers to spaces around buildings, with the suggestion that the proposed gap between the host property and the neighbouring property [i.e. the clubhouse] would be '...at odds with the rhythm of other dwellings within the street.' Contrary to this statement, the gap would not be entirely filled; a nom.1800mm gap would remain between the proposed house and the neighbouring clubhouse at No.14, a gap size similar in scale to those between Nos.26/34A/36, 34/36, and 38-40

Kentwood Hill has a mixture of terraced houses (with no gaps between dwellings), semi-detached and detached dwellings, the latter categories having a variety of gaps in between. To suggest that there is a rhythm of such gaps is clearly incorrect and misleading and there are no gaps, of course, between houses within the existing terraces.

4.8 – 4.21. Appendix 1: Policy H3 of the LPA Affordable Housing Supplementary Planning Document states:

*"... The following types of residential development will be **exempt** [my emphasis] from the requirement to provide affordable housing:*

- *Replacement of a single dwelling with another single dwelling; and*
- *Conversion of a dwelling to self-contained flats where there is no new floorspace."*

The second exemption would not apply as clearly the proposals are to increase floorspace, but the first exemption can be interpreted as applying to the current proposals, which are to replace two **single dwellings** with **another two single dwellings**, the LPA's wording acknowledging the 'like-for-like' nature of such a development.

Notwithstanding that argument and in order not to jeopardise this planning appeal in the event that an exemption is not supported by the Planning Inspector, the appellant is prepared to enter into a planning obligation in the form of the attached unilateral undertaking to support affordable housing within the borough, and based on the £37500 contained in para:4.17 of the LPA's Statement.

5.2. For the reasons stated in the Grounds of Appeal and above, we strongly consider that the design has merits by integrating with the area and providing a suitably spacious environment inside and out in a manner harmonious with the nature of the construction. The LPA's support for the '...generic and modest benefits.. ' [sic] to contributing to the supply of housing, to efficient use of underutilised land in a highly sustainable location and to contributing to the provision of affordable housing appears to be hollow.

APPENDIX 1: DRAFT CONDITIONS:

Generally there are no over-riding objections to the proposed conditions except as stated below:-

Materials (to be approved):

Brickwork walls and plain roof tiles are already specified on the submitted drawings. Further details would appear unnecessary.

SAP Assessment (Design Stage and As Built)

As SAP assessments are an essential requirement of building regulations it appears inappropriate to additionally require them to be submitted to discharge a planning condition, particularly a pre-commencement condition. This duplicates administrative tasks for no obvious purpose.

Landscaping

The proposals are for two self-contained houses with private outdoor spaces and gardens. There are no proposed common areas and sufficient information appears to be already on the submitted drawings, certainly enough not to make such a condition pre-commencement.

Removal of PD rights

As mentioned above, the site area is not overly constrained and contrary to the stated reason for this proposed condition the Town & Country Planning (General Permitted Development)(England) Order 2015 [GPDO] prevents 'unrestricted' development. This condition would therefore appear unnecessary to protect the amenities of neighbouring properties.

No new openings

This condition offers unnecessary controls beyond those contained within the GPDO over minor alterations and is unnecessary to safeguard the amenities of the adjoining premises. The non-residential clubhouse would appear to be the only likely practical beneficiary.

Construction Hours

In principle this condition would be acceptable, with the proviso that the proscribed activities should be permissible at any time in an emergency. Notwithstanding the general acceptability of this condition, it would be expected that the control of construction hours would form part of the Construction Method Statement.

Cycle Parking

Rather than having to 'show how bicycle parking facilities can be satisfactorily provided on site', which are already shown on the submitted drawings, if the LPA wish to retain oversight of these facilities it is suggested that details of their design could be submitted for approval prior to occupation instead.

Use restriction –C3 only

Class L of the GPDO controls the conversion of a C3 dwelling to a small HMO, and compliance with Policies CC7 and H8 are cited by the LPA as reasons for imposing such a restriction. However, Policy CC7 is concerned with design and the public realm, and it is unclear how use as a small HMO would affect these. Policy H8 details when C4 HMOs would be acceptable, but the LPA has not declared this area as unsuitable under Article 4 of the GPDO, nor has it explained why such a restriction would be relevant on this site. There appears to be a prejudice against a form of accommodation that many have chosen, and although there are no current plans for such a use, such a restriction seems particularly incongruous when located next door to a clubhouse.

Yours sincerely

M D Howlett
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