



320 Kings Road, Reading, RG1 4JG

Proposed change of use of the dwelling to large HMO and 2-bed flat (retrospective) and proposed erection of a new access ramp, following demolition of the existing stairs.

Planning Statement

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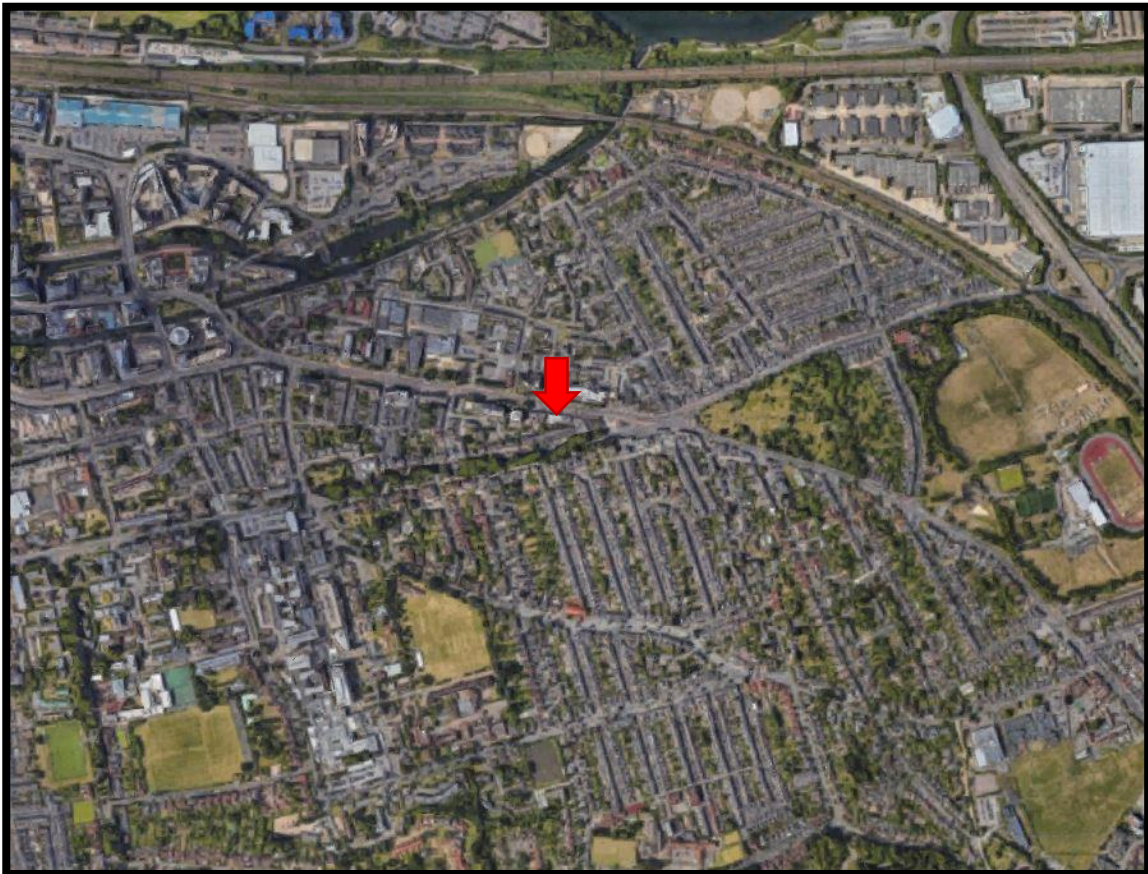
1. Introduction

1.1. Preface

This planning statement has been prepared in support of a Full application for the proposed change of use of the dwelling to large HMO and 2-bed flat (retrospective) and proposed erection of a new access ramp, following demolition of the existing stairs at 320 Kings Road in Reading.

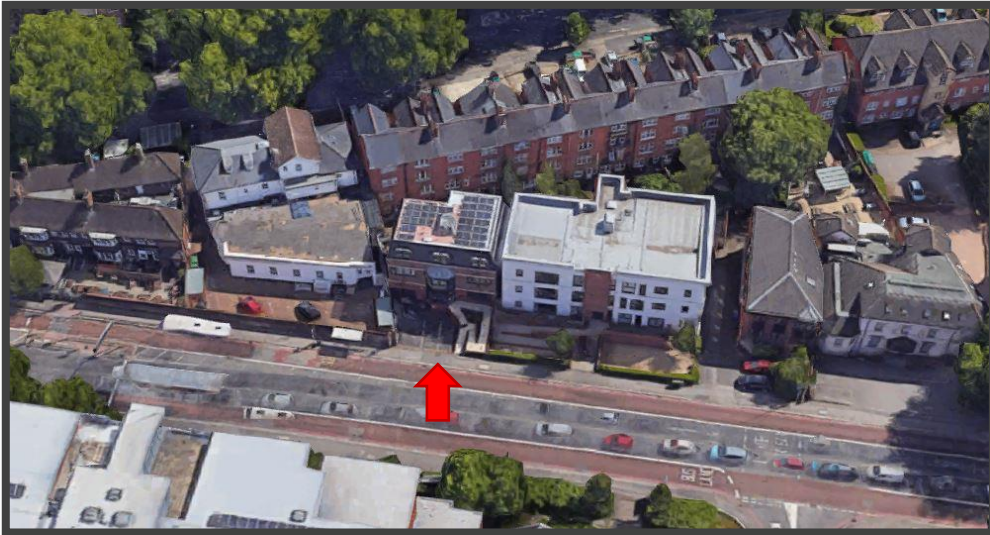
The following statement covers the subject and information required for submission as set National Planning Policy Framework and Reading Borough Local Plan documents. This document will outline the application site history and the design strategy for the proposed development. It should be read in conjunction with the submitted drawings.

1.2. Site Location

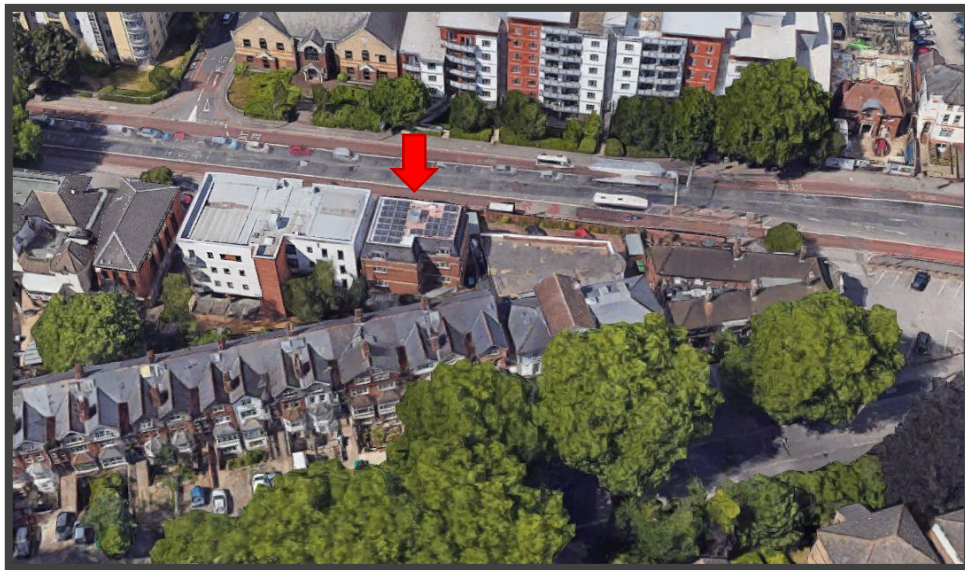


Aerial photograph





Bird's eye photograph (front)



Bird's eye photograph (rear)

1.3. Site Description

The application site is located on the southern side of Kings Road, within around 1km from the Reading Town Centre. No. 320 Kings Road is a building, located within a group of properties of diverse use. Adjacent to the application site there are blocks of flats, shops, pubs, places of worship, educational facilities, therefore as a whole the surrounding area is considered to be significantly mixed in terms of the scale and design of the properties.

Summarising, within the closest proximity from the application property, there are numerous of buildings, diverse in terms of their:

- type (semi-detached; detached; terraced; block of flats);



- diverse height from single to 7 storey high;
- fenestration and architectural details;
- roof forms (angle, design, ridge/eaves height);
- scale/footprint/volume;
- landscaping;
- distance from the highway, boundary treatment and driveways.

2. Planning Policy

2.1. NPPF

Achieving Sustainable Development

Paragraph 7 of the NPPF emphasises that *“The purpose of the planning system is to contribute to the achievement of sustainable development”* and expands that in the paragraph 8, that it *“has three overarching objectives, which are interdependent and need to be pursued in mutually supportive:*

- *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;*
- *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*

Furthermore, a decision-making in favour of sustainable development is strengthened and its significant weight is confirmed in paragraph 38, which states that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and*



environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.

Residential redevelopment location

Paragraph 69 of the NPPF encourages to prioritise small development sites with regards to housing land provision and it emphasises that *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

- *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare;*
- *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”.*

Furthermore, an effective use of land is significantly highlighted in paragraph 72, which says that development suitable for first time buyers or entry-level sites should *“be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards”,* whereas paragraph 119 encourages Local Planning Authorities to *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”* and *“makes as much use as possible of previously-developed or ‘brownfield’ land”*. Additionally, paragraph 120 says that decisions should *“promote and support the 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 (for example converting space above shops”.*

Housing Quality and Design

Paragraph 126 of the NPPF states that the *“creation of high quality buildings and places is fundamental to what the planning and development process should achieve”* and that *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.*

Furthermore, NPPF paragraph 128 emphasizes an important role of the design codes and guides, which should *“provide a framework for creating distinctive places, with a consistent and high quality standard of design”* and that *“their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified”.*



Paragraph 130 of the NPPF comprises a list, in terms of what decisions should ensure with regards to proposed developments, inter alia:

- *“function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *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);*
- *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;*
- *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*
- *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”.*

Delivering a decent level of design quality is comprised in paragraph 130 - *“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design”.*

2.2. Local Development Framework (November 2019)

Residential redevelopment location

The proposed dwelling would be accommodated within the settlement boundaries for Reading. Local Plan Policy H8 ‘Residential Conversions’ states that *“Proposals to convert buildings into self-contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing.”* It is also required to provide 120 square metre gross internal space and communal space for the residents.

Policy H8 then continues that *“Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:*



- *The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;*
- *The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;*
- *There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*
- *There is no inappropriate stacking and location of rooms between units;*
- *Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and*
- *The resulting property or properties would provide adequate internal floorspace and headroom for residents."*

Effectively, due to residential character and sustainable location of the proposed development in the current application, Local Plan confirms a clear assumption in favour of such HMO redevelopment, as described in this statement. Besides major developments, small-scale housing conversions has been strengthened in Paragraph 4.4.57, which states that *"Residential conversions have an important role to play in housing land supply in Reading. The subdivision of large houses has often enabled renovation and affordable maintenance of properties"*. It also emphasised that *"...conversions provide for a market need for small, flexibly let accommodation reflecting household formation trends in the population and the more transient nature of parts of the labour market"*.

Furthermore, it is highlighted that the density of HMOs should be appropriate, as per the paragraph 4.4.65, which states that *"Planning permission will not normally be granted where the proportion of HMOs (either C4 or sui generis) will result in HMOs representing 25% or more of the residential properties within a circle of 50m radius measured from the application site."* It must be noted that the application site is **outside of the Article 4 boundaries**.

Accessibility

Number of Local Plan Policies relate to sustainable development, such as CC6 'Accessibility and the intensity of development' part, which emphasises importance of sustainable location of development – *"The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility."*.



Policy CC6 explains in paragraph 4.1.25 that *“...primary locations for new development will be those accessible by walking and cycling to a wide range of employment, services and facilities, leisure, education and health facilities, or which are accessible by walking to routes/stops of frequent public transport services that provide easy access to the aforementioned uses”*. Paragraphs 4.1.27 continues that good level of accessibility means - *“to be that within 400m of a defined centre with a good range of facilities by pedestrian routes, and within 400m by pedestrian routes of a bus stop served by a service with a frequency of better than one bus every 20 minutes in each direction within daytime hours (7.00 a.m. to 7.00 p.m.).”*

The general health targets, accompanying appropriately located developments, mentioned in the explanation of this policy include:

- *“increased physical activity;*
- *decreased incidences of cardiovascular disease and obesity;*
- *reduced levels of stress caused by traffic noise and congestion;*
- *fewer cases of lung or heart disease associated with poor air quality;*
- *proximity to healthcare services;*
- *access to open space for recreation”*.

Design Quality

Policy CC7 states that *“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:*

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials”*.

The above components are linked with the subsequently highlighted urban design objectives, which should be enhanced by the proposals, inter alia:

- *“Character - a place with its own identity and sense of place;*
- *Continuity and enclosure;*
- *Quality of the public realm and provision of green infrastructure and landscaping;*
- *Ease of movement and permeability;*
- *Legibility - clear image and easy to understand;*
- *Adaptability – capable of adaptation over time;*



- *Diversity – meets a wide range of needs”.*

In addition, CC7 summarizes and encourages to ensure that proposed developments:

- *“Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.”*

3. Appraisal

3.1. General concept

The overall aim of the proposal is to make efficient use of the existing site and its assets, by proposing to create a separate flat with 7 bedroom HMO of improved design and sustainability, through the above proposal. The application property is characterized with a location within Reading settlement boundaries, which is significantly mixed in terms of the design or scale, where such residential development is acceptable in principle.

3.2. Impact on the Character of the Area

The upper level flat and HMO elements of the proposed development are retrospective and would not include any external extensions to the building. Only the front staircase, which include awkwardly designed ramp and stairs would be demolished and replaced with a simplified solution, therefore the overall frontage appearance and front layout would be significantly improved, in particular that the site is clearly visible within the streetscene. The frontage would benefit from a more spacious arrangement, suitable for parking of 3x vehicles. In general, it is considered that the project includes an in keeping external design, which would reflect the character of the area, but also upgraded to a high-quality design and standard of living internally and that such arrangement would provide more affordable units, suitable for a family and young couples, professionals or students.



3.3. Impact on neighbours

Loss of Light and Overbearing

Due to the host building's situation, retention of the overall scale and form and sufficient separation distances from the neighbouring properties, no adverse changes to current overbearing and overshadowing arrangement would be considered to arise.

Overlooking

Due to the lack of fenestration changes, no adverse alteration to the current overlooking arrangement would be considered to arise as well, with no unacceptable impact upon the adjacent occupiers' amenity.

3.4. Transport, parking and access

The proposed site is located in the eastern part of Reading, on the southern side of Kings Road. Given close proximity from Cemetery Junction and town centre (about a 5min walk) or the town centre (around 10 min walk), the application property benefits from an extensive bus service including numerous routes with frequent links to Reading Centre and Wokingham Town Centre. Furthermore, Reading Station is located around 1.3km (20min walk) to the west.

The application property is sited in close vicinity to road which also provide vehicle access to the A329 and links with the M4 for towards the east to London and Wales to the west. The broad road networks around the site also provide huge choice and possibilities of cycle routes and walking paths in and around the area. As per the 'Cycle routes network map', the application site is conveniently location in close vicinity from the R20 and R30 routes, which easily link Reading Town Centre or Reading University and Wokingham.





Cycle routes network map

There are also easily accessible local amenities along shopping parades on Kings Road, Wokingham Road and around 10 min walk from shopping the town centre commercial units. Both retail locations include wide range of services such as grocery shops, churches, temples, pharmacy, cafes, pubs, educational facilities, hospital or nursery. Range of services located within walking distance from the application site, makes it highly appropriate and sustainable for a HMO with a flat development.

No. 320 Kings Road currently benefits from an off-street parking for 2x vehicles. This arrangement would be improved with the proposed scheme and provide in total 3x parking spaces. Nevertheless, thanks to a highly sustainable location, close to the town centre, the proposal would be considered acceptable and uncontroversial with regards to this aspect.

3.5. Layout – HMO and 2-bed flat

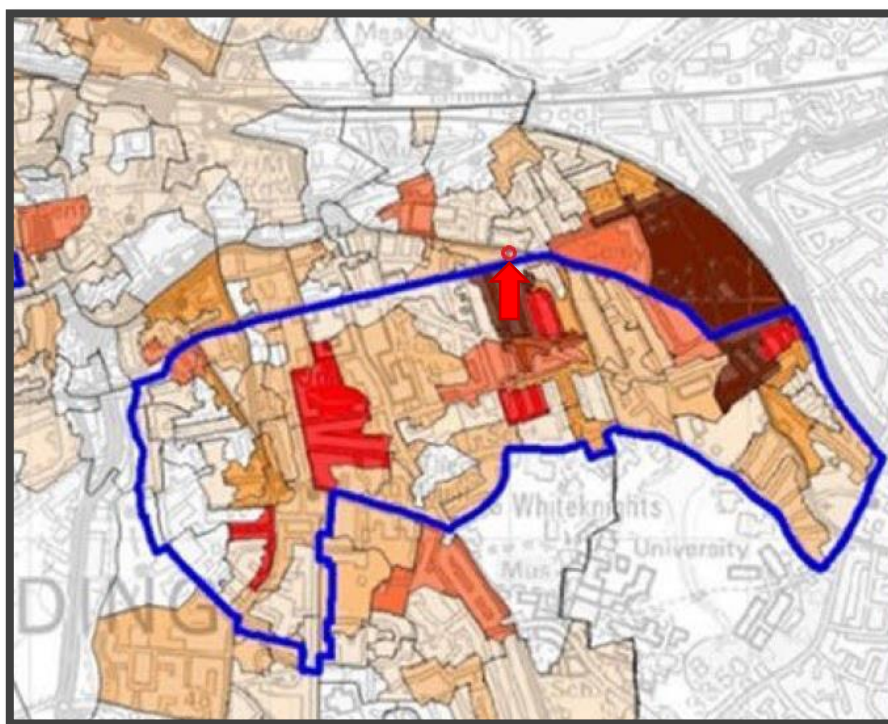
Policy H8 of the Local Plan confirms that in case of proposal for a HMO, it is required that:

- The property to be converted measures more than 120 square metres gross;
- There is sufficient communal space.



It is considered that, as a result of the proposed development, the application property would stand in accordance with the Local Plan Policy H8. The proposal would comply in terms of the above-mentioned requirements. Its internal Gross Internal Area (Ground Floor and First Floor – HMO part) would measure circa 265.0m² with a 20.5m² internal social space. The proposal would be considered spacious and sufficient, providing a well-designed HMO units, ideally suitable for young couples, professionals or students. The proposed 7 bedroom HMO would result in increased number of more affordable units, positively contributing to the Council's target and in compliance with the NPPF. Furthermore, the application site's location is considered extremely suitable to provide higher density of HMO units, due to very low rate of existing HMOs within the close vicinity. The property lies on the boundary of 1-5% and 5-10% (see below HMO distribution map) and well linked with the educational facilities in Reading, via diverse means of transport.

In addition, the application site is considered suitable for such conversion. The proposed internal space of about 265.0m², would be sufficient and appropriate for a 7 bedroom HMO, which would include very spacious and sizable bedrooms (min. 18.3m² and max. 36.0m²), where all of them would have separated and personal bathrooms. The proposed layout provides appropriate level of privacy and living quality, due to appropriate internal ground and first floor arrangement. It is also clear that the proposed HMO would be considered acceptable when compared with the 'Residential Conversions Supplementary Planning Document'. The proposal would also successfully meet requirements in terms of minimum kitchen, communal space and bedrooms internal area.



Distribution of HMOs across the Borough.



In addition, the application site includes retrospective conversion of the upper-level flat. The proposed internal space of about 115.0m², would be sufficient and appropriate for a 2-bedroom flat, which would include spacious bedrooms, where all of them would have separated and personal bathrooms. The proposed layout provides appropriate level of privacy and living quality, in compliance with the 'Technical housing standards - nationally described space standard' adopted by Department for Communities and Local Government in March 2015 (70.0m² for a 2-bed flat).

8. Conclusion

By virtue of the scale and nature of the proposed development, it is considered that it would comply with the relevant parts of NPPF, Reading BC Local Plan, therefore we kindly appeal, to approve the submitted application.

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