

Change of use from a dwelling (Class C3) to a 7-person house in multiple occupation (Sui Generis) and associated works

11 Newcastle Road, Reading, RG2 7TN

Planning Statement

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Prepared for: Brett Property Developments Ltd

Document Information

About

This document has been prepared for Brett Property Developments Ltd by Squires Planning.

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Should you wish to contact Squires Planning about this report, please email info@squiresplanning.co.uk or phone 01293 978 200. Please quote our project reference number which is 0239.

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1. Introduction

- 1.1. The Planning Statement has been prepared by Squires Planning in support of an application by Brett Property Developments Ltd for the:

‘Change of use from a dwelling (Class C3) to a 7-person house in multiple occupation (Sui Generis) and associated works’
- 1.2. This document provides an overview of the site, its context and the proposed development before considering the material considerations relevant in the determination of this application.

Site & Situation

- 1.3. The site measures circa 0.05ha and is situated to the north of Newcastle Road, circa 2km southeast from the centre of Reading. It comprises a semi-detached, two storey residential dwelling and its front and rear gardens.
- 1.4. The site is bordered to the north by a row of trees beyond which is a footpath and Cintra Park, to the east by the neighbouring semi-detached property, to the south by Newcastle Road and to the west by the curtilage of 9 Newcastle Road.
- 1.5. The area is urban in nature, comprising mainly detached, semi-detached and terraced properties along Newcastle Road. To the east are allotments and there are shops along Northumberland Avenue to the west.
- 1.6. The site fronts a Green Link and both the allotments and Cintra Park are designated as Local Green Space / Public Open Space.

Planning History

- 1.7. The relevant applications made on the site are set out below:

Reference	Description	Decision
PL/24/0693	Proposed 2-storey rear extension	Approved
PL/24/1054	Change of use from a dwelling (class c3) to 7 person house in multiple occupation (sui generis) and associated works.	Refused – Appeal Dismissed

- 1.8. The site has a limited planning history. Permission was granted under PL/24/0693 for a 2 storey rear extension.
- 1.9. Most recently, PL/24/1054 was refused. The stated reasons for the refusal on the Decision Notice issued on the 11th October 2024 are:
 - 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.

1.10. An appeal was lodged under APP/E0345/W/25/3361380 but was dismissed on the 10th July 2025. Key points made by the Inspector from the Appeal Decision are set out below.

- Whilst I note that the appellant has calculated that 52.4sqm of communal space would be provided, the majority of it is transitional space, not space to settle and relax in. The only such place is the dining area. This space is small, measuring 11.2sqm, and is part of the open plan kitchen. As such I do not consider it to be sufficient for the four residents to relax in, particularly given it would be exposed to the activity, noise and smells of the property's kitchen. Whilst I accept that the garden is large, it would not be accessible all year round, for instance during inclement weather. I conclude that the proposed change of use would not provide adequate living conditions for future occupiers with regards to communal space, contrary to policies H8 and CC8 of the RBLP with respect to sufficient communal space and acceptable living conditions, the SPD and the National Planning Policy Framework (the Framework) with regards to healthy living conditions.
- The site is not within an HMO Article 4 area, is below the required 50% threshold in the SPD and there is no dispute that the proposal would lead to a 29% increase in HMOs within a 50m radius of the property. However, the Council consider that such an increase, coupled with the fact that the development is within an area which is regarded as being in the 30% most deprived in England (indicating it is between 10% and 20% most deprived) where the SPD says planning permission will not normally be granted, means that it fails to meet the provisions of policy H8. Whilst I note the views of the Council and the concerns raised by neighbours that this row of properties is mainly multiple occupancy houses, given the unambiguousness of the 50% threshold in policy H8, I do not consider 29% to be close enough to that figure, to lead to a overconcentration of HMOs such that it would unduly harm the composition of the existing community. In view of the above, I conclude that the proposal would not harm the mix and balance of housing stock in the community, therefore complies with Policy H8 of the RBLP and the SPD with regards to maintaining a mixed and balanced community and the Framework.
- Whilst it is not likely that the site contains priority habitat, the proposal does not demonstrate that on-site habitat exceeding 25sqm would not be impacted. Therefore, it is not demonstrated that the de minimis exemption would apply. It has not been demonstrated that the proposal would be exempt from the BNG condition, and the minimum information required to support the application in this regard has not been provided. I am therefore not satisfied, on the very

limited information provided, that the statutory BNG condition would be capable of being complied with in this instance.

- 1.11. The appeal decision is a key material consideration for the determination of this application. As set out within this statement, the application addresses the issues from the appeal, namely through having increased internal communal space and providing suitable details on BNG.

2. The Proposed Development

- 2.1. This application seeks the '*Change of use from a dwelling (Class C3) to a 7-person house in multiple occupation (Sui Generis) and associated works*'.
- 2.2. The proposed development constitutes a change of use from a 3-bedroom dwelling to a 7-person HMO. Internally, the property would consist of a hall, communal room, kitchen/dining room and 2 bedrooms with ensuite bathrooms on the ground floor, a landing and 4 bedrooms with ensuite bathrooms on the first floor, and a landing and 1 bedroom with an ensuite bathroom on the second floor.
- 2.3. The gross internal areas of each room are set out below.

Room	Room Type	GIA (m ²)
Bedroom 1	Bedroom	13.3
Bedroom 2	Bedroom	15
Communal Room	Communal Room	8.6
Kitchen	Communal Room	11.2
Dining Room	Communal Room	12.8
Bedroom 3	Bedroom	15.1
Bedroom 4	Bedroom	10.3
Bedroom 5	Bedroom	10
Bedroom 6	Bedroom	12.9
Bedroom 7	Bedroom	25.4

- 2.4. All of the bedrooms comply with the Nationally Described Space Standards. The level of communal space has increased from 52.4m² in PL/24/1054 to 62.3m².
- 2.5. The associated works include the creation of an additional tarmac driveway parking space with an EV charger, tree and hedgerow planting in the rear garden, and works to the exterior of the building which include any necessary repairs to the render and timber boarding, and changes to the fenestration. The change of use can be carried out following the completion of the extension approved under PL/24/0693.

3. Planning Policy

- 3.1. Planning decisions should be taken in accordance with the development plan unless material considerations indicate otherwise (Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 3.2. In this case, the adopted development plan consists of:
- Reading Borough Local Plan 2019
 - The Central and Eastern Berkshire Minerals and Waste Plan
- 3.3. Policy contained in the National Planning Policy Framework (NPPF) published in December 2024 is also material in the determination of this application.
- 3.4. The most relevant policies in the development plan and national policy are set out below.

Reading Borough Local Plan

- 3.5. The Local Plan was adopted in November 2019 and contains the policies for how Reading will develop up to 2036. It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated and restricted, and sets out policies for how planning applications will be decided. The most relevant policies are set out below.
- 3.6. **Policy CC7: DESIGN AND THE PUBLIC REALM** highlights that '*All development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located*'. It states that layout, landscape, density and mix, scale and architectural detail and materials will be assessed.
- 3.7. **Policy CC8: SAFEGUARDING AMENITY** requires that '*Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties*' in terms of several factors including privacy and overlooking, access to sunlight and daylight, visual dominance, harm to outlook etc.
- 3.8. **Policy EN12: BIODIVERSITY AND THE GREEN NETWORK** requires new development to demonstrate how the location and type of green space, landscaping and water features maintain or link into the existing green network. It also states that '*On all sites, development should not result in a net loss of biodiversity and geodiversity*'.
- 3.9. **Policy EN14: TREES, HEDGEROWS AND WOODLANDS** states that trees, hedges and woodland will be protected from damage or removal where they are of importance, and new development shall make provision for tree retention and planting within the application site.
- 3.10. **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 then provides additional criteria for

conversions of houses to self-contained flats, sui generis houses in multiple occupation and areas covered by an Article 4 direction.

- 3.11. **Policy H10: PRIVATE AND COMMUNAL OUTDOOR SPACE** states that '*Dwellings will be provided with functional private or communal open space*' which includes green space where possible. It highlights that houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space.
- 3.12. **Policy TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING** requires that '*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*'. It also provides additional criteria for EV charging provision.

4. Main Considerations

4.1. In this section we will consider the main issues relevant to the proposed development. We believe the main issues to be:

- Principle of Development
- Character and Design
- Residential Amenity
- Transport and Parking
- Ecology

4.2. We discuss each issue in turn below.

Principle of development

4.3. The proposed development comprises a change of use from a dwelling (Use Class C3) to a 7-person HMO (Sui Generis). Policy H8 relates to residential conversions and for changes of use to Sui Generis HMOs requires that the property to be converted measures more than 120m² and that there is sufficient communal space which is defined in the Council's Residential Conversions SPD.

4.4. There is no doubt that the property measures more than 120m². The amount of communal space is discussed in the Residential Amenity section of this statement however a sufficient level is now provided (62.3m²). The proposed development therefore complies with Policy H8.

4.5. The Officer's Report for PL/24/1054 repeats Section 6 of the Residential Conversions SPD which states that:

'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 of the following apply:

- *The proportion of houses within a 50m radius of the application site 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'*

4.6. The Officer's Report states that *'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'*.

- 4.7. The number of HMOs within a 50m radius of the application site would increase to 29% as stated in the Officer's Report, but this would be well below the maximum of 50% indicated in the SPD. The proposed development would therefore accord with the SPD. This was echoed by the Inspector in APP/E0345/W/25/3361380 who concluded that:

'The site is not within an HMO Article 4 area, is below the required 50% threshold in the SPD and there is no dispute that the proposal would lead to a 29% increase in HMOs within a 50m radius of the property. However, the Council consider that such an increase, coupled with the fact that the development is within an area which is regarded as being in the 30% most deprived in England (indicating it is between 10% and 20% most deprived) where the SPD says planning permission will not normally be granted, means that it fails to meet the provisions of policy H8.

Whilst I note the views of the Council and the concerns raised by neighbours that this row of properties is mainly multiple occupancy houses, given the unambiguousness of the 50% threshold in policy H8, I do not consider 29% to be close enough to that figure, to lead to a overconcentration of HMOs such that it would unduly harm the composition of the existing community.

In view of the above, I conclude that the proposal would not harm the mix and balance of housing stock in the community, therefore complies with Policy H8 of the RBLP and the SPD with regards to maintaining a mixed and balanced community and the Framework.'

- 4.8. The proposed development complies with Policy H8 and the Residential Conversions SPD. It is therefore acceptable in principle.

Character & Design

- 4.9. The proposed development consists of very limited external works. It includes paving to the front of the property to provide an additional parking space. Landscaping works to the rear are also proposed, along with the installation of the cycle store which neither the Council or the Inspector previously took issue with.
- 4.10. The Officer's Report for PL/24/1054 noted that *'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'*. However, the Council did not include this conflict in the reasons for refusal.
- 4.11. Notwithstanding the above, we note that most of the properties on Newcastle Road have full width areas of hardstanding, and this can be achieved under permitted development. The replacement of part of the green frontage with a parking space would therefore be entirely in keeping with the character of the local area and *'maintains and enhances the character and appearance of the area of Reading in which it is located'* in accordance with Policy CC7.
- 4.12. The other associated works include minor works to the property such as small changes to the fenestration which would have a negligible impact on the appearance of the building.

Residential Amenity

- 4.13. Policy H8 requires sufficient communal space to be provided for Sui Generis HMOs in accordance with the Residential Standards SPD. Policy H10 also requires that *‘Dwellings will be provided with functional private or communal open space... Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space’*.
- 4.14. The Officer’s Report for PL/24/1054 states that *‘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’*.
- 4.15. This was reflected by the Inspector in APP/E0345/W/25/3361380 who concluded that:
- ‘Based on the appellant’s assessment that three of the bedrooms have sufficient space for a sofa, coffee table and all the facilities that are typical for a communal room, with the other four having space for a desk only, one communal room would be required. Whilst I note that the appellant has calculated that 52.4sqm of communal space would be provided, the majority of it is transitional space, not space to settle and relax in. The only such place is the dining area. This space is small, measuring 11.2sqm, and is part of the open plan kitchen. As such I do not consider it to be sufficient for the four residents to relax in, particularly given it would be exposed to the activity, noise and smells of the property’s kitchen. Whilst I accept that the garden is large, it would not be accessible all year round, for instance during inclement weather.*
- For the reasons explained above, I conclude that the proposed change of use would not provide adequate living conditions for future occupiers with regards to communal space, contrary to policies H8 and CC8 of the RBLP with respect to sufficient communal space and acceptable living conditions, the SPD and the National Planning Policy Framework (the Framework) with regards to healthy living conditions.’*
- 4.16. In response to the above, the internal layout has been tweaked to reposition one of the ground floor bedrooms to the first floor of the property, to create space for a bespoke communal room measuring 8.6m². This would increase the amount of communal space from 52.4m² to 62.3m².
- 4.17. The Residential Conversions SPD requires for HMOs *‘A standards of one communal space for every 4-6 bedrooms (depending on the size of the bedroom) will be provided, which will have acceptable amenity standards and appropriate access for all residents’*.
- 4.18. The property would therefore have two communal rooms as a result of the provision of the communal room and the kitchen/dining room. Notwithstanding this, the property is also served by a large rear garden and a number of bedrooms significantly exceed the 11.5m² minimum set out in the Nationally Described Space Standards, most notably bedroom 2 (exceeds by 3.5m²), bedroom 3 (exceeds by 3.6m²) and bedroom 7 (exceeds by 13.9m²). This ensures that all residents benefit from an appropriate level of communal and private internal space. The proposed development accords with

the Residential Conversions SPD and policies H8 and H10 and the previous reason for refusal is overcome.

Parking

- 4.19. Policy TR5 states that '*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*'.
- 4.20. The Council's Parking Standards and Design SPD requires HMOs in Zone 2 to provide 0.25 parking spaces per bedroom. For the proposed development, this provides a requirement for 1.75 spaces (rounded up to 2). The proposal provides two parking spaces to the front of the property which complies with these standards. The scheme also includes an EV charging point and a cycle store for the occupants.
- 4.21. The Officer's Report for PL/24/1054 notes that this can only be achieved to the detriment of the character of the area, however we firmly disagree as most of the properties on Newcastle Road have parking areas spanning across the width of the frontage of the properties. Further, this was not an issue advanced at appeal by the Council, presumably due to the fact that it is not defensible.
- 4.22. The proposed development therefore complies with the Parking Standards and Design SPD and Policy TR5.

Ecology & Trees

- 4.23. The development would not result in any impacts on retained trees. 5 trees are proposed within the rear garden, alongside a hedgerow that runs parallel along part of the eastern boundary.
- 4.24. Apart from the tree planting, the only physical works proposed within the rear garden is the addition of the cycle store. Due to the very minor nature of these works, no impacts on protected sites, habitats or species are anticipated.
- 4.25. Regarding biodiversity net gain (BNG), a Biodiversity Net Gain Assessment has been prepared by Beamsley Ecology. It calculates that the development would result in a net loss of -0.09 biodiversity units (-61.59% net loss). Due to the site's constraints, 10% cannot be achieved on site and therefore the purchase of biodiversity units will be required to satisfy the trading rules for BNG. Details of this will be provided through the submission of a Biodiversity Gain Plan which should be conditioned.

5. Conclusion

- 5.1. The proposed development seeks the *'Change of use from a dwelling (Class C3) to a 7-person house in multiple occupation (Sui Generis) and associated works'*.
- 5.2. This application seeks to overcome the reasons for the refusal of PL/24/1054, and the subsequent reasons why the Inspector dismissed APP/E0345/W/25/3361380.
- 5.3. The property measures more than 120m² and provides a sufficient amount of communal space and therefore the conversion is supported by Policy H8. The proposals also comply with the Residential Conversions SPD as the proportion of houses within a 50m radius of the site being used as HMOs or have been converted into flats, does not exceed 50%. This was supported by the Inspector in APP/E0345/W/25/3361380. The principle of the development is therefore acceptable.
- 5.4. The proposed development would result in very minor external works. In the Officer's Report for PL4/1054 it was noted that the laying of tarmac to create an additional space to the front of the property would not be a positive contribution to the character of the area. This was not included as a reason for the refusal of the application, and we disagree with this assertion as most of the properties on 11 Newcastle Road have full width frontages comprising hardstanding and parking areas. It therefore would be in keeping with the character of the area in accordance with Policy CC7. The other external alterations result in negligible impacts due to their nature and scale.
- 5.5. One of the reasons for the refusal of PL/24/1054 and the dismissal of APP/E0345/W/25/3361380 related to an insufficient provision of communal space. The internal layout of the proposal has been amending to provide a dedicated communal room. This has increased the level of communal space from 52.4m² to 62.3m². The provision of the communal room, increased level of communal space, large bedrooms and large rear garden ensures a sufficient level of communal space is provided in accordance with policies H8 and H10, and the Residential Conversions SPD.
- 5.6. The proposed HMO would be provided with 2 car parking spaces, one of which would have an EV charging point, and a cycle store in accordance with Policy TR5 and the Council's Parking Standards and Design SPD.
- 5.7. The proposal wouldn't impact on retained trees and would provide 5 new trees as well as a hedgerow. Due to the limited nature of the external works, there would be no impacts on protected sites, habitats and species.
- 5.8. The development would not achieve 10% BNG on site, therefore biodiversity units will need to be purchased to satisfy the trading rules.
- 5.9. Consequently, the proposal complies with the NPPF and Development Plan, and therefore, it is requested that planning permission be granted.



Planning, Development, Collaboration

South East & London Office

The Long Barn, Poplars Place
Turners Hill Road
Crawley
West Sussex
RH10 4HH

01293 978 200

info@squiresplanning.co.uk

Thames Valley Office

Unit 2-3, Dorcan Business Village,
Murdock Road, Dorcan,
Swindon
Wiltshire
SN3 5HY

01793 570 830

info@squiresplanning.co.uk



RTPI

Chartered Town Planners