

DELEGATED APPLICATION REPORT

Ward: Park Ward

App Ref: PL/25/1477 Full planning permission

Address: 62 Manchester Road ,Reading, RG1 3QN

Proposal: Change of use of the basement of 62 Manchester Road from use class (Ea.) storage ancillary to the retail shop to Commercial short let lettings use class (C3) (part retrospective).

Applicant: Imran Hussain

Received date: 16/10/2025

Target Decision date: 13/03/2026

Case Officer: Ethne Humphreys

1. SITE DESCRIPTION

The application site relates to the basement of No.62 Manchester Road, an end of terrace property located on the east side of Manchester Road, on the corner junction with Liverpool Road to the north. The ground floor comprises a retail unit and the upper floors are in residential use. The basement was originally approved as ancillary storage to the retail unit, albeit it appears works have taken place to facilitate conversion to the proposed use, and it now appears to be a self-contained unit. It does not appear to be occupied.

The site is not listed nor in a conservation area and the surrounding area predominantly comprises terraced residential streets.

2. PROPOSAL AND SUPPORTING INFORMATION

This application seeks planning permission for the change of use of the basement of 62 Manchester Road from use class (Ea.) storage ancillary to the retail shop to Commercial short let lettings use class (C3).

The layout comprises a bedroom, kitchen/dining space, shower/wc and a 'sunken garden' area. Soft landscaping is proposed within the garden area.

Physical works appear to have started, and the application is part retrospective.

Plans considered:

Location Plan

Block Plan Drawing No. 1065/12

Proposals Drawing No. 1065/11

Daylight Assessment 6571 dated August 2025 Issue 1

Planning Statement

Received 9th February 2026

3. CONSULTATIONS

Transport Officers: No objection, subject to conditions, discussed below.

Waste Operations: Insufficient information, discussed below.

A site notice was displayed. No neighbour letters of representation received.

EQUALITY ACT 2010

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. The proposal makes inadequate provision for disabled access. Discussed below.

4. PLANNING HISTORY

21/0177 Change of use of the basement and ground floor at 62 Manchester Road from Class A1 (shops) to C3 (dwellinghouses) to comprise 2 flats. Prior Notification under Class M, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). Withdrawn.

19/1670 Conversion of existing commercial basement to a 1-bed flat (Class C3). Decline to determine.

18/1533 Conversion of existing commercial basement to 1-bed flat (Class C3). Refused and dismissed at appeal.

18/0491 Single storey basement extension to existing commercial unit. Approved.

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 December 2024

National Planning Practice Guidance 2014 onwards

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

CC3: ADAPTATION TO CLIMATE CHANGE

CC5: WASTE MINIMISATION AND STORAGE

CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT

CC7: DESIGN AND THE PUBLIC REALM

CC8: SAFEGUARDING AMENITY

EN14: TREES, HEDGES AND WOODLAND

H1: PROVISION OF HOUSING

H2: DENSITY AND MIX

H5: STANDARDS FOR NEW HOUSING

H8: RESIDENTIAL CONVERSIONS

H10: PRIVATE AND COMMUNAL OUTDOOR SPACE

TR1: ACHIEVING THE TRANSPORT STRATEGY

TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

Other documents

Revised Parking Standards and Design SPD 2011

Residential Conversions SPD 2023

Planning Obligations under Section 106 2015

Sustainable Design and Construction 2019

Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024.

Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

Officer advice in respect of the Local Plan policies pertinent to this application is that they remain in accordance with national policy (aside from Policy H1, which is acknowledged to be out-of-date) and that the objectives of those policies remains very similar in the submission draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’ (aside from Policy H1).

6. APPRAISAL

Land Use Considerations

As per the planning history above, the basement area subject of this application was approved as storage ancillary to the ground floor use of the building as a retail unit. It is clearly no longer in use as approved and has resulted in a loss of retail storage floor space. Notwithstanding, it is considered that the retail use could continue to function at ground floor without the basement area without resulting in a detrimental impact on the retail nature of the shop. As such, there are no in-principle issues with the loss of the floor space use in itself.

As detailed below, however, the proposals, particularly relating to the standard of accommodation, would fail a number Local Plan Policies.

Design Considerations

Policy CC7 states that all development must be of high design quality that maintains and enhances the character and appearance of the area.

The Policy also specifically refers to developments needing to “Address the needs of all in society and are accessible, useable 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”.

Access to the basement unit is solely by external steps. This severely diminishes access for mobility impaired people and would make wheelchair access impossible. Contrary to Policy CC7 of the Reading Borough Local Plan and the NPPF 2024.

Bin storage is shown on the shop forecourt, adjacent the gate to the ‘sunken garden’. As noted elsewhere in this report, it is not clear whether this is sufficient for waste, and it is likely that additional storage may be required. This is likely to give rise to an untidy forecourt / cluttered street scene and this would be exacerbated by the very visible corner plot location.

Amenity Considerations for Future Occupiers and Impact on Neighbours

Policy CC8 seeks to ensure development does not cause harm to the living environment of existing properties, in terms of loss of privacy, overlooking and visual dominance, amongst other matters and that development would not result in unacceptable living conditions for new residential properties in terms of access to sunlight and daylight and harm to outlook. Policy H10 seeks to ensure that residential developments are provided with adequate private or communal outdoor amenity space.

Quality of Internal Accommodation for Future Occupiers

There are a number of significant shortfalls in the quality of accommodation proposed.

The Residential Conversions SPD notes that “not all basements are suitable for conversion to a separate unit of living accommodation” and “In terms of daylight provision outlook and headroom the basement level is often deficient”. Whilst it is acknowledged that the proposal is for ‘short term lettings’, nevertheless, the SPD criteria is useful, has relevance and the short term letting nature does not mean that substandard accommodation should be accepted. Short term refers more to the fact that this is not a 6 month assured shorthold tenancy, rather than the occupation actually being for a short period in terms of the experience of persons occupying. Three months for instance would be a significant period over which to suffer the harms identified.

The proposal is not considered to provide acceptable living conditions for future occupiers, in respect of daylight, sunlight and outlook.

With regard to the bedroom, there would be limited light to this room, due to the close proximity of the lightwell walls (C as annotated on the plans) and further exacerbated by the street grilles above (as annotated). There would be limited outlook due to the position of the French doors facing directly onto the lightwell wall and in close proximity, also exacerbated by the street grilles. The photo below shows the restrictive nature of the lightwell, this is without the steel grilles present:



Albeit there are French doors leading out to the lightwell, the area is not large enough to form meaningful amenity space, and it would be overlooked by occupiers of No.60 Manchester Road:



The dining/kitchen area would be served by lightwells 'D' as annotated and French doors. Lightwells 'D' are even more restricted than 'C' due to limited depth of less than 1m – which would also be further restricted by the steel grilles as annotated:



These lightwells offer no outlook and extremely restricted light levels. This would likely be further restricted by people standing outside the shop forecourt:



Whilst there would be light to the dining/kitchen area from the French doors to the 'sunken garden', this appears limited as a consequence of the tall retaining walls – which would be restrictive and oppressive.

The Residential Conversions SPD states that “an acceptable outlook is one that, for example, provided residents with a view of a garden area and/or sky and is not restricted to narrow light well and associated retaining walls”. The 'sunken garden' area is surrounded on all sides by tall walls and views of the open sky can only really be obtained from the rear patio, and similarly, this would largely be an upwards view only. Given this area would be north facing, it would receive limited natural light and sunlight. Furthermore, given its proximity to the shop forecourt, and highway, combined with the dominant nature of the walls, this is unlikely to be a pleasant garden space for future occupiers, with noise levels exacerbated by users of the footpath and highway immediately adjacent. The garden would provide no mitigation for the poor quality internal environment.

Overall the proposed arrangement would create a gloomy, enclosed and oppressive living environment for future occupiers, harmful to their amenity.

The garden area is located immediately adjacent the footpath and front forecourt of the shop. There is no defensible space, and members of the public could stand next to the wall looking into the garden area, resulting in a loss of privacy. The garden area is not considered attractive in its own right for the reasons given and nor is it considered to acceptably mitigate the poor quality of internal accommodation:



A daylight assessment has been submitted. It is noted that this refers to the proposal as being for the creation of one new dwelling. This casts doubt on the submission and given previous applications proposing conversion of basement to dwelling. However, the agent has advised that this is a typing error which is acknowledged. Notwithstanding, the report is limited in its evidence and does not appear to have considered sunlight. Furthermore, the report does not state whether the results represent an average picture of the course of the year, based on a range of values, or whether they are taken as a 'worse case' scenario i.e during the winter months on an overcast day.

In overall terms, the proposals would result in poor natural light levels with little sunlight penetration and poor ambient lighting and limited – to none – outlook.

As noted elsewhere in this report, there is no step free access to the basement unit, with access only possible via external steps, another indicator of the overall poor standard of accommodation provided. This would be harmful to amenity in general – the steps would be unpleasant and awkward to negotiate, especially in bad weather. However most importantly the steps would prevent access by wheelchair users and would be difficult for other mobility-impaired users which would negatively affect their experience and safe use of the development.

In terms of waste, short term lets would not be entitled to the Council's standard waste collection service and would require arrangement of a commercial waste collection from a private contractor. Whilst bins are indicatively shown on the plans, no further information has been provided in this respect, and it is not clear that there would be sufficient space for waste to be separated into as required – general waste, recycling, food waste and glass recycling – and without further imposing on the garden area which is already restricted.

The Planning Statement considers the proposal to 'bring forward a high quality holiday let' – for the numerous reasons given, this is not considered to be the case. Conversely, the unit as a whole appears unacceptably enclosed and contrived. Consequently, the development creates a poor living space with limited natural light and poor outlook, along with privacy concerns and poor external amenity space for future occupiers, contrary to Policies CC8, H8 and H10 of the Reading Borough Local Plan 2019 and the NPPF 2024.

Existing Neighbour Amenity

Notwithstanding the harm identified above, the proposals are not considered to result in any significant harm to any neighbouring property in terms of loss of privacy, light or overbearing effects. Whilst activity generated by a short term let may lead to a level noticeably more intensive than that which could reasonably be expected to be associated with a single dwelling, it is not considered to be so disruptive to occupiers of neighbouring properties to be harmful.

Sustainability

Policy CC2 requires new development to reduce the consumption of resources and materials and includes that “*All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘VERY GOOD’ standards, as a minimum*” and that “*Conversions to residential should incorporate water conservation measures.*” Policy CC3 requires all development to demonstrate how they have been designed to incorporate measures to adapt to climate change.

Given the nature of the proposals, a sustainability statement, incorporating a BREEAM domestic refurbishment pre-assessment, should have been submitted with the application. None has been provided. Furthermore, given that works have taken place, no details have been provided to demonstrate how the proposals have complied with the requirements of Policy CC2 or CC3 and the Sustainable Design and Construction SPD.

Transport/Parking

Policies TR3 and TR5 seek to address access, traffic, highway and parking related matters relating to development.

The property is located within Zone 2, Primary Core Area of the Council’s adopted Parking Standards and Design SPD which directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. There are no specific parking standards for holiday let accommodation. Therefore, an application of this type is considered on its own merits considering local circumstances including access to public transport provisions and the availability of parking and on-street regulations.

No parking is provided as part of the proposal. Given that Manchester Road and the surrounding roads are within a controlled parking zone where a residential parking scheme operates, unauthorised on-street parking could be controlled via the administration of the scheme. The proposed short-term let would not be entitled to residents or visitor permits.

There are no Transport objections. However, should the scheme have otherwise been considered acceptable, conditions would have been applied restricting car parking permits for future occupiers.

S106

Should the application have otherwise been supportable, the short term let nature of the proposals would have been secured via legal agreement to require occupiers to not occupy the premises for an appropriate period of time. However, due to the unsuitable nature of the accommodation, the proposals are not considered suitable even on a short term let basis and legal agreement not pursued.

7. CONCLUSION

There is no objection to the loss of ancillary retail floor space. However, the shortfalls in the quality of accommodation as discussed above are such that these deficiencies are considered to significantly outweigh any benefits of the scheme.

8. RECOMMENDATION

The proposals would fail to provide an adequate provision of daylight, sunlight or outlook, and would represent an overly enclosed, unpleasant and oppressive living environment which, in combination would result in poor quality living conditions for future occupiers, harmful to their amenity. The proposals are, therefore, contrary to Policies CC8 and H8 of the Reading Borough Local Plan 2019, the Residential Conversions SPD 2023 and paragraph 135 of the NPPF 2024.

The proposals, due to their sunken, overlooking arrangement and proximity of public to private areas, together with the lack of defensible space, would result in a harmful loss of privacy to living areas and outdoor garden space, harmful to the residential amenity of future occupiers. The proposals are, therefore, contrary to Policies CC8, H8 and H10 of the Reading Borough Council Local Plan 2019 and paragraph 135 of the NPPF 2024.

The proposals fail to demonstrate BREEAM 'Very Good' standard or that the proposals would achieve suitable provision for waste and bin storage for future occupiers. The proposals therefore fail to achieve an acceptable environmental quality, contrary to Policies CC2, CC3, CC5, CC7, CC8 and H8 of the Reading Borough Local Plan 2019 and paragraphs 164 of the NPPF 2024.

The proposals, due to the lack of step-free access into the site, would fail to provide appropriate access for disabled persons. The proposals are, therefore, contrary to Policies CC7 and CC8 of the Reading Borough Local Plan 2019 and paragraph 117 of the NPPF 2024.