



ET Planning

Planning Statement

Client: **RealProfit Ltd**

24 Baker Street

Reading, RG1 7XX

*Change of use of property from C4 use class (6 bedroom HMO) to
Sui Generis use class for seven bedroom HMO.*

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1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of a C4 use class house in multiple occupation ('HMO') (six bedrooms) to a Sui Generis HMO (seven bedrooms).
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by Hives Architects:
- 2906 C001 P1 'Site Location Plan'
 - 2906 C002 P1 'Existing Floor Plans And Elevations'
 - 2906 C003 P4 'Proposed Floor Plans And Elevations'
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site comprises a two storey semi-detached building, set across four internal floors which include a basement and loft conversion. As established under Certificate of Lawfulness PL/25/1331, the lawful use of the site is as C4 use class HMO, and previous to this it was a C3 use class dwelling.
- 2.2 The site benefits from an enclosed rear garden with side access, and a short frontage where bins are currently stored.
- 2.3 The site lies within a predominately residential area (containing both C3 dwellings and HMOs), within the defined settlement of Reading, due southwest of the town centre (within walking distance), and south of the primary route of Oxford Road. The site also lies within the Castle Hill/Russell Street/Oxford Road Conservation Area.
- 2.4 Neighbouring properties fronting the streetscene are of similar overall design and architectural vernacular (with some exceptions), though with variation in materials and height/bulk, as well as the presence of backland development, giving rise to a dense form of development.

3. Relevant Planning History

- 3.1 Certificate of Lawfulness (Proposed Development) reference PL/25/1815 for 'Erection of outbuilding in rear garden used for purposes incidental to the main dwelling'. Certificate Granted, 09.02.2026
- 3.2 Certificate of Lawfulness (Existing Use) reference PL/25/1331 for '...Change of use from C3 family dwelling to C4 House in Multiple Occupation'. Certificate Granted, 08.02.2026.

4. Development Proposals

- 4.1 The proposal is for the change of use of a C4 use class HMO (six bedrooms) to a Sui Generis HMO (seven bedrooms).
- 4.2 Operational development is sought in the provision of cycle store facilities for the prospective occupants (where no secure cycle storage currently exists) to the rear of the property. This would provide a total of 7no spaces (i.e. one space per occupant). The precise location and elevational appearance of these stores can be adjusted if required.
- 4.3 Internal works are proposed to incorporate the change of use sought. This would involve replacing WC & Shower rooms on the first floor to an additional bedroom, with the provision of WC & shower rooms to the individual bedrooms which do not currently have such facilities. Small kitchenette areas are also proposed to the majority of the individual bedrooms (the existing basement room already has a kitchen), which specifically take the form of a sink, mini-fridge and microwave. However these kitchenette facilities are deliberately limited in scope and provision, maintaining the existing communal kitchen area as a necessity that also provides an amenity area.
- 4.4 As set out in Planning Case Law¹, a HMO can contain a mix of self-contained rooms (in terms of bathrooms and kitchen facilities) and rooms reliant on communal facilities. In this case, the existing basement room already contains elements to allow day-to-day self-containment, and there is no change to this. The remaining rooms would benefit from individual WC & shower facilities but would still be reliant on the communal kitchen for cooking proper meals as well as facilities such as a clothes washing machine.

¹ *Welwyn Hatfield BC v Secretary of State for Levelling Up, Housing and Communities & Beesley [2022] EWHC 3175 (Admin)* et al.

- 4.5 While the above position is established in Case Law, were the Council to have any concerns over the provision of kitchenettes this is open to be reviewed as part of the application consideration.
- 4.6 It is acknowledged that the site contains an extant Certificate of Lawfulness for an outbuilding (extant in terms of the C4 use). This does not form part of this submission.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that “Local planning authorities should approach decision on proposed development in a positive and creative way” and “at every level should seek to approve applications for sustainable development where possible”. Paragraph 124 of the NPPF comments that planning should “promote an effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions”.
- 5.3 Paragraph 61 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 131 identifies 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”, whilst paragraph 139 states that significant weight should be given to “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.5 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market

demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use" (para 109).

- 5.6 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 Reading Borough Council's Development Plan relevant to the proposal comprises the Reading Borough Local Plan (2019) ('LP') alongside the associated Policies Map.
- 5.8 The site is located in the defined settlement of Reading, where the LP directs the majority of development to come forward within the existing built-up area, making efficient use of land and responding to the individual and ever-changing, household needs.
- 5.9 The above aligns with NPPF paragraph 124, which sets out that planning policies and decisions should promote and effective use of land in meeting the need for homes, amongst other uses.
- 5.10 LP Policy H8 sets out that proposals to convert buildings into houses for multiple occupation will only be acceptable subject to a list of requirements, which includes avoiding an undue loss of family housing (C3 use class), and respecting the character of the area.
- 5.11 In this case, the site already operates as a HMO, and this has been lawfully confirmed as the existing use (see Section 3 above). Therefore, the proposal would not result in the loss of C3 housing, and it falls for the proposal to be assessed as the impact of the addition 1no. net bedroom, which also triggers a change of use to Sui Generis.

- 5.12 LP Policy H8 seeks for HMOs to exceed a minimum floorspace of 120 sqm, and in this case the building comfortably exceeds this figure, particularly given the existing presence of basement and converted loft levels. In other words, the dwelling has not been previously externally enlarged to meet this floorspace, as the basement and loft are original features.
- 5.13 Policy H8 also seeks for HMOs to ensure an adequate provision of communal space, which is expanded upon in the Council's Residential Conversions SPD. This SPD states in paragraph 4.10 that where all bedrooms significantly exceed minimum room standards, one communal room per six bedrooms can be considered appropriate.
- 5.14 In this case the individual bedrooms would exceed the minimum space standards, and would also be provided a level of independent amenity through dedicated WC & shower rooms, and kitchenettes, with the basement room providing a level of self-contained facilities (as per existing arrangements). This is considered to enable flexibility in terms of the provision of additional communal rooms, and furthermore, the property also benefits from a significant rear garden area which provides outdoor amenity (with reference to LP Policy H10).
- 5.15 In the previous application submission the Council raised potential concerns regarding the existing basement rooms light and outlook. However, the basement is established to have planning permission for use as a HMO room, as per PL/25/1331. The Council considered however that as a full planning application the basement was due for reconsideration, when it already having planning permission. Under such a position one would be required refuse a rear extension already built under permitted development rights because it happened to have loss of light concerns, simply because it is shown on the plans for a full application involving an additional extension to the front.

- 5.16 Therefore, the proposal is considered to constitute a modest intensification of a single bedroom, and with the provision of the amenity facilities discussed, is considered to provide an acceptable level of amenity. The proposal is therefore presented to be acceptable in principle, subject to matters including impact on the character of the area, residential amenity, etc.
- 5.17 **Conservation Area:** The site lies within the Castle Hill/Russell Street/Oxford Road Conservation Area.
- 5.18 LP Policy EN1 states that the historic environment, including Conservation Areas, should be protected (and where possible enhanced). LP Policy EN3 goes on to state that development proposals in a Conservation Area must conserve and/or enhance its special interest, thereby making a positive contribution.
- 5.19 In this case, no external alterations are proposed as part of the proposal, and the site operates as an existing C4 HMO. While an intensification of use is acknowledged, this intensification would be modest, at the level of one additional bedroom.
- 5.20 It is therefore considered that the proposal would not have any negative impact upon the Conservation Area.
- 5.21 **Character and Appearance of the Area:** As per the above Conservation Area sub-section, the material impact of the proposal would be centred around the intensification of use (or lack thereof), given no operational development is proposed.
- 5.22 LP Policies CC1 and CC8 in combination seek to ensure that proposals do not result in harm through over-intensive or incompatible use, particularly where this would undermine the settled character of the area.

- 5.23 Also as per paragraph 5.10 onwards in the Statement above, LP Policy H8 seeks to prevent over-intensification or proliferation of HMOs, but this is in the context of the existing site already operating as a HMO.
- 5.24 The surrounding area, not only within Baker Street, but in the general wider area south of Oxford Street, is comprised of a notable number of HMOs (of varying sizes) in addition to C3 dwellings. In this regard, the proposal would be in keeping with the character of the area, and any discussion of over-proliferation is moot given the existing lawful HMO use.
- 5.25 In the context of an increase of one bedroom within the proposal, it is considered that the proposed Sui Generis use would be proportionate and would avoid any negative impact to the character of the area. Furthermore it is considered the cycle storage would for an incidental feature that would not make any form of notable impact.
- 5.26 **Residential Amenity:** LP Policy CC8 requires that development proposals do not cause a detrimental impact in terms of factors including privacy, daylight, or noise & disturbance, etc.
- 5.27 Given the modest scale of the cycle store, the proposal would not result in any privacy or daylight issues.
- 5.28 In terms of any noise generation, this would be in the context of the proposal involving a net increase of one bedroom to what is already in operation. In view of this, it is not considered that the proposal would give rise to any material harm in terms of noise levels, which are in existing terms proportionate to the dense residential setting.
- 5.29 Matters regarding the amenities of the prospective occupants of the application site itself have been considered in paragraphs 5.13 onwards above.

- 5.30 **Trees, Landscaping & Drainage:** Due to the nature of the proposals there would be no material change to existing landscaping or drainage, nor are any trees impacted.
- 5.31 **Transport and Parking:** LP Policy TR5 seeks for car and cycle parking appropriate to the accessibility of the location, including in respect of sustainable transport and seeking to encourage a shift away from reliance on the private car where possible. Similarly LP Policy H8 also seeks to ensure that that HMO development provide adequate cycle provision.
- 5.32 LP Policy TR4 sets out that developments will be expected to maximise use and opportunities to improve cycling provision and access.
- 5.33 A key theme of the NPPF as a whole is to highlight the importance of sustainable development. This extends to locational/geographic sustainability. Namely, NPPF paragraph 110 states that development should be focused on locations which are (or can be made) sustainable, including through limiting the need to travel and offering realistic choice of transport modes.
- 5.34 NPPF paragraph 115 sets out that in assessing planning applications, it should be ensured that sustainable transport modes are prioritised.
- 5.35 The Council's Parking SPD seeks as guidance a general parking standard for HMOs at 0.25 spaces per bedroom, and considers this a reflection of the typically lower car ownership levels amongst HMO occupants.
- 5.36 The SPD is also required to be read in conjunction with the Reading Transport Strategy 2040, of which Policy RTS21, which explains that the Council will review the level of provision and location across the Borough as an ongoing process, including in respect of considering

new developments. As part of this, the Council is to encourage sustainable patterns for travel and promote sustainable travel choices.

- 5.37 Firstly, the difference between a 6 bedroom HMO and a 7 bedroom HMO does not trigger the provision for an additional whole parking space to be provided. In other words, the level of any shortfall would be maintained.
- 5.38 Secondly, and most importantly, it is proposed for the development to be a car-free development. A Transport Statement is accordingly submitted with this application. As a summary, the Transport Statement highlights the site achieves a connectivity score of 86 (based on the Department for Transport's Sustainable Transport Modes scoring mechanism). This places the application site in the top 10% of all locations in England and Wales in terms of sustainable transport connectivity.
- 5.39 The Transport Statement goes on to identify that the site has a high level individually of walking, cycling, bus and rail accessibility, including in respect of local and essential amenities.
- 5.40 The above cumulatively provides evidence that the application site is exceptionally well connected by sustainable modes of travel, and this is therefore a highly locationally sustainable development. The site and proposal therefore offer the opportunity for a car-free development, which fully accords with the aspirations of the Council's Development Plan.
- 5.41 As a Planning benefit, cycle provision is to be provided on site (where there is currently no formal cycle parking). It is sought for up to seven secure spaces to be provided, so that each occupant has a space when the property is at full capacity.

- 5.42 **Air Quality:** The site lies within an Air Quality Management Area ('AQMA').
- 5.43 LP Policy EN15 states that development should have regard to the need to improve air quality, and reduce the effects of poor air quality. The policy seeks to achieve this by explaining that development which would detrimentally affect air quality will not be permitted unless the effects can be mitigated.
- 5.44 The proposal would not be introducing a new residential or HMO use, but rather expanding upon an existing HMO activity. Air quality issues in this location are primarily caused by emissions from vehicular traffic, particularly in the vicinity of the town centre, Oxford Road, and Castle Hill.
- 5.45 In this case the introduction of one additional bedroom, where personal vehicle ownership is likely to be low, in combination with the sustainable location of the development (see 'Transport and Parking' subsection above), it is not considered that the development would offer a materially relevant contribution to existing air quality (positive or negative).
- 5.46 As per paragraph 4.2.81 of the LP, the development proposal is substantially below the threshold of requiring an Air Quality Assessment.
- 5.47 Furthermore, in offering a car-free development, the proposal would meet the overarching aspirations of the AQMA in not only avoiding any increase in air pollution, but offering the potential to reduce it by removing any form of car reliance. This is a Planning benefit.
- 5.48 **Ecology:** The proposal is exempted from biodiversity net gain as it meets the exemption of being below the threshold of impacting a priority habitat.

- 5.49 **Community Infrastructure Levy:** Reading Council has an adopted CIL Liability Schedule, and the development is CIL liable. However, as there is no net increase in dwellings, and as the existing floorspace involved has been in active use, the liability in this instance is zero.

6. Conclusion

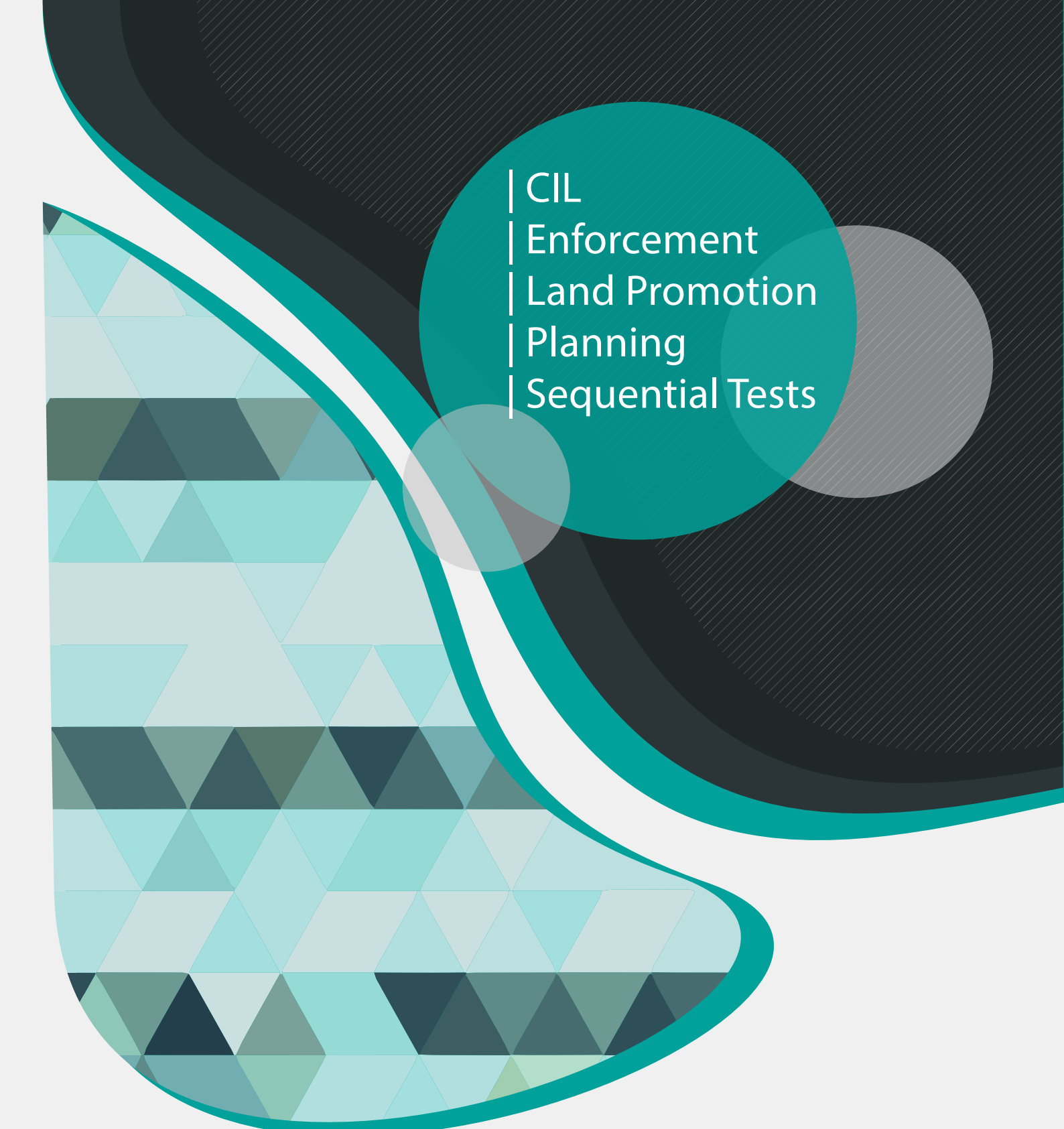
- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of a property under existing C4 lawful use.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would provide a suitable, and modest, level of additional accommodation, without any impacts to the surrounding Conservation Area, or to parking demands, etc.
- 6.3 The level of amenity and communal space provided the prospective occupants is considered proportionate to the level of facilities provided within the individual rooms (noting the existing facilities, including to the existing basement room). This is combined with the outdoor amenity space.
- 6.4 The proposal offers a car-free development, supplemented with proposed secure cycle provision. The utilisation of a car-free scheme in this location is robustly supported by the submitted Transport Statement.
- 6.5 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.

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