

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: 3rd June 2020

Ward: Abbey

App No.: 191479

Address: 152 Caversham Road, Reading, RG1 8AZ

Proposal: Change of use of a former guest house (C1) to an 8-bedroom, 8 person house in multiple occupation (Sui Generis). (amended)

Applicant: Mr Mark Bennett

Deadline: 8/1/2020

Extended Deadline: 5/6/2020

Planning Guarantee 26 week target: 13/5/2020

RECOMMENDATION:

Approve Planning Permission subject to conditions and informatives.

CONDITIONS TO INCLUDE:

- 1) TL1 - standard time limit 3 yrs.
- 2) AP1 - Approved plans.
- 3) DC1 - Vehicle parking as specified and retained.
- 4) HM3 - HMO refuse & recycling (vermin proof) to be submitted and approved.
- 5) HM4 - HMO cycle storage to be submitted and approved.
- 6) HM5 & HM6 - HMO - No entitlement to parking permits.
- 7) C1 - Hours of construction and demolition.
- 8) C4 - No burning of waste.
- 9) HM1 - In accordance with approved HMO Management Plan.
- 10) HM2 - The communal area - kitchen/living/dining to the ground floor, as on the approved plan, to be retained for communal use at all times.
- 11) The HMO use at ground, first and second floors hereby approved shall be restricted to a maximum of eight persons.
- 12) N9 - Noise assessment and mitigation residential to be submitted and approved.
- 13) To be undertaken in accordance with the measures as set out in the FRA pre-occupation.
- 14) Rear amenity space and front garden space to be implemented pre-occupation and retained as shown on the approved plan.

INFORMATIVES TO INCLUDE:

- 1) IF5 - Terms and Conditions
- 2) IF6 - Building Regulations
- 3) I10 - Noise between residential properties
- 4) I26 - Housing Act
- 5) I11 - CIL not chargeable
- 6) I13 - Parking Permits
- 7) IF2 - Pre-commencement Conditions

- 8) IF7 - Complaints about Construction
- 9) IF3 - Highways
- 10) Contact Waste Team to ensure correct number of bins is provided.
- 11) A planning permission does not confer any rights of access over Third Party land
- 12) IF1 - Positive & Proactive

1. INTRODUCTION

- 1.1 The site is located on the eastern side of Caversham Road and is the former Bridge Lodge guest house, next to the Thameside Hotel. The property was purchased in June 2019 and internal works are currently taking place to convert the property to an HMO as applied for through this application.
- 1.2 This part of Caversham Road includes a number of non-residential uses: small retail, guesthouses/hotels, hot food takeaways and larger properties under HMO.
- 1.3 This is a terraced property of three storeys (with the second floor within the roof space). The ground level to the rear of the property is lower than at the front, hence there are a few steps internally as you progress between the front and the rear of the property. To the rear is a concreted yard area, currently used for parking, accessed from Thames Avenue.
- 1.4 The planning history (having undertaken an online search) does not appear to include an approved change of use to a guest house (and microfiche records cannot currently be consulted due to the lockdown of the council offices). However, on the basis that it appears that the property has been used as a guest house for almost 30 years, as an established use it goes well beyond the 10 years for a change of use to be the subject of enforcement action.
- 1.5 The site is within an Air Quality Management Area (Policy EN15). The front part of the property is within Flood Zone 2, and the rear part within Flood Zone 3 (Policy EN18).
- 1.6 This application was called to your meeting by Councillor Page due to concerns for the quality and intensification of use and parking.



Location plan



Front view (as a guest house)

2. PROPOSAL

2.1 The original submission was to change the former guest house use to a 9 bed Sui Generis House in Multiple Occupation (HMO) with the inclusion of a rear single storey extension, to accommodate one of the proposed bedrooms. The amended scheme is for the change of use to an 8 bedroom, 8 person HMO, with no extension.

2.2 The layout would be as follows:

Ground Floor - 2 en-suite bedrooms: 11.8sqm and 7.90sqm, communal kitchen, lounge/diner 31.95sqm, access to the rear.

First Floor - 2 en-suite bedrooms: 13.89sqm and 8.37sqm, bathroom and 2 bedrooms 10.57sqm and 7.46sqm

Second Floor - 2 en-suite bedrooms: 12sqm and 7.2sqm
(dimensions exclude en-suites and areas below 1.5m head height)

One car parking space, cycle store, bin store and amenity space.

2.3 **Originally submitted plans** and documentation as received 4th November 2019 are as follows:

- Location Plan
- Existing Floor Plans - Drawing no: CavershamRd - 152- 01
- Existing Elevations - Drawing no: CavershamRd - 152- 03
- Proposed Floor Plans - Drawing no: CavershamRd - 152- 01
- Site Plan [Proposed] - Drawing no: CavershamRd - 152- 05
- Proposed Elevations - Drawing no: CavershamRd - 152- 04
- Planning Statement, dated 30/10/19, prepared by Platinum Property Partners

Amended and additional information:

- Existing and Proposed Elevations - Drawing no: CavershamRd - 152- 03a, received 13th February 2020
- Proposed Floor Plans - Drawing no: CavershamRd - 152- 01a, received 13th February 2020
- Site Plan [Proposed] - Drawing no: CavershamRd - 152- 05a, received 21st May 2020

- Flood Risk Assessment, dated 11/2/20, prepared by Ambiental Environmental Assessment, received 9th March 2020
- HMO Management Plan Covering Internal and External Communal Areas. Dated April 2020, received 17th April 2020

2.4 *Community Infrastructure levy (CIL):*

In relation to the Community Infrastructure Levy, the applicant has duly completed a CIL liability form with the submission. Under the Council's Charging Schedule the proposed development has a zero charge.

3. PLANNING HISTORY

88/01246/COU (880325) - Change of use from snack bar with residential accommodation to guest house - Refused 12/1/1989 - *Loss of permanent residential accommodation; the proposed use is over intensive and substandard; and the parking facilities are substandard and poorly arranged.*

91/00075/FUL (910704) - Single storey rear extension to provide a boiler & laundry room - Approved 21/3/1991

91/00708/ADV (910195) - Painted Sign - Approved 15/9/1991

91/00747/FUL (910631) - Awnings on front elevation - Refused 14/10/1991

91/01047/FUL (910998) - Awnings on front elevation - Approved 5/12/1991

190274/PREAPP - Pre-application advice for conversion of existing guest house (C1 use Class) to Large HMO (Sui Generis Use Class) - Observations sent 14/3/2019

4. CONSULTATIONS

4.1 Statutory

Environment Agency

They stated that as this is a minor development in a flood zone and it involves change of use within the same vulnerability type of use (i.e. more vulnerable) that their Flood Risk Standing Advice should be used. They highlighted that while the number of bedrooms has not changed the use has gone from short term stays to full time occupancy. This could increase the number of people at risk of flooding. Safe access and egress must be assessed as part of this application.

4.2 Non-statutory

Environmental Protection & Nuisance (EP&N) -

Environmental Protection concerns:

- Noise impact on development
- Noise transmission between dwellings
- Air Quality impact - increased exposure / new receptors
- Construction and Demolition phase
- Bin storage - rats

Noise impact on development - A noise assessment should be submitted in support of applications for new residential proposed in noisy areas. This location is likely to experience high levels of noise from the busy Caversham Road. Whilst this was a guest house previously, the consequences of being exposed to high noise levels temporarily are much less significant than for a permanent resident.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

The noise assessment data should also include noise events (LAMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night, as this is linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB LAeq,8hour	
Living rooms (07:00 - 23:00)	<35dB LAeq,16hour	
Gardens & Balconies	<50dB LAeq,T	<55dB LAeq,T

As a noise assessment has not been submitted and the proposed development is by a very busy road, I recommend a condition is attached to any consent requiring a noise assessment to be submitted prior to commencement of development and any approved mitigation measures implemented prior to occupation to show that recommended noise levels in the table above can be met.

The noise assessment will need to identify the external noise levels impacting on the proposed site.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised

should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards.

I recommend the following condition: N9 - Noise Assessment & Mitigation Residential (to be submitted).

Noise between residential properties - sound insulation of any building - include an informative.

Air Quality - Increased exposure - The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. The monitoring results for the nearby Caversham Road air quality monitoring site shows that the limit value for NO₂ was breached/exactly at the limit last year. Therefore mitigation measures should be provided as part of the application.

The mitigation plan must quantify the impact on emissions the proposed mitigation will have, in order to show that future occupants will be protected from the effects of poor air quality.

One method of protecting future occupants is by setting a development back from the source of pollution. Where the development involves converting an existing building and allowing a buffer zone is not an option it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.

Mitigation against increased exposure:

- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones - consider increasing distance of the building façade from very busy roads
- Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
- Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants

- Green Infrastructure - Installation of green walls, rooves, or planters.

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

I recommend the following condition: N14 - Air Quality Mitigation (to be submitted).

Construction and demolition phases - extensions / renovations - We commonly receive complaints about noise and dust caused by construction and demolition works, particularly working outside reasonable hours and about smoke from bonfires associated with the burning of waste on site of minor developments.

I recommend the informatives regarding construction hours no burning of waste are attached to help prevent complaints.

Transport

The initial comments were as follows: The proposal consists of the change of use of a C1 Guest House in to a 9 bedroom HMO.

Caversham Road is a Classified road and is located just outside Reading town centre and is close to Caversham Centre. It falls within the Zone 2, the primary core; this zone directly surrounds the Central Core and extends to walking distances of 2 kilometres from the centre of Reading, this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone. The site is within easy walking distance to Reading Station (North Entrance). The completed Christchurch Bridge across the River Thames is appropriate for cyclists and forms part of the North Reading designated cycle route, it links to National Cycle Network Route 5.

In accordance with the adopted Parking Standards and Design SPD, the development would be required to provide parking provision of 0.25 parking spaces per room. The existing use currently benefits from a parking area located at the rear of the site. The submitted Planning Statement states that 4 off road parking spaces would be available which would be in excess of the current Parking Standards, however this has not been illustrated on submitted plans. Revised plans required.

Caversham Road and the surrounding road network all have parking restrictions preventing on-street parking. There are also limited waiting bays along the frontage of the retail units and houses on the opposite side of the carriageway which restricts parking to 30 mins between 9.15am-4.30pm. Outside of these hours, these parking bays

are available without restriction.

The development site is located close to roads that operate a Residents Parking permit Scheme, Parking Permit Area; Zone 03R. Under the Borough's current parking standards, this proposal would generate additional pressure for parking in the area. Therefore if this application is approved there should be an assumption that any future occupants of the proposed dwellings will not be issued with a resident parking permit which should be covered by condition and an informative applied. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 0.5 cycle parking spaces for each dwelling which should be in a conveniently located, lockable, covered store. This therefore equates to a minimum of 5 cycle parking spaces for this proposed development. Although the planning statement states that cycle storage will be provided at the rear of the site this has not been illustrated on submitted plans. Revised plans are required.

Bin storage has not been illustrated on the submitted plans. Bin storage should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings and should be located no further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods. Revised plans illustrating storage and collection points are required.

Please ask the applicant's agent to submit revised plans addressing the points above.

Planning Officer note: Following the reduction of the number of bedrooms by one to eight and further discussion with Transport and the agent, a final amended site plan was submitted to show one car parking space, along with an improved rear amenity space, bin store and cycle storage. Transport has confirmed that 1 car parking space would be acceptable. This is based on the location of the site and the parking controls in the area. Further details are required for the proposed Sheffield Stands. Conditions related to parking permits, providing and retaining the parking space, and further details of the bin store are in the recommended conditions and informatives as included above.

4.3 Public

Nos. 144-150, and 154 Caversham Road were consulted and a site notice was displayed.

One observation was received as follows (with regard to the original submission, which included the rear extension):

“We do not wish to object to the proposed plans. However, we would strongly suggest that the following measures to be taken into consideration when reviewing and approving this application. There is a well-known rodent infestation in the area being close to the river. Therefore pest control measures should be put in place As well as commercial waste collection to reduce the attraction of such vermin. Previous owners have not put these measures in place causing severe problems to resident and commercial. Secondly parking is a major issue for this area as well as traffic so please ensure that this is considered.”

5. RELEVANT PLANNING POLICY AND GUIDANCE

5.1 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) (2019) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

5.2 The Development Plan is the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Policy CC1: Presumption in Favour of Sustainable Development

Policy CC2: Sustainable Design and Construction

Policy CC3: Adaptation to Climate Change

Policy CC5: Waste Minimisation and Storage

Policy CC8: Safeguarding Amenity

Policy EN15: Air Quality

Policy EN16: Pollution and Water Resources

Policy EN18: Flooding and Drainage

Policy H8: Residential Conversions

Policy H10: Private and Communal Outdoor Space

Policy TR1: Achieving The Transport Strategy

Policy TR3: Access, Traffic and Highway-Related Matters

Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

5.3 Relevant Supplementary Planning Documents (SPDs) are:

- Sustainable Design and Construction (December 2019)
- Revised Parking Standards and Design (October 2011)
- Residential Conversions (2013)

5.4 Other relevant information:

- National Guidance: Review Individual Flood Risk Assessments: Standing Advice for Local Planning Authorities, March 2019

6. APPRAISAL

6.1 Policy H8 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.

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.....*

Additionally, in the case of sui generis houses in multiple occupation (HMOs):

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

6.2 Along with the relevant adopted local planning policies the appraisal of the application has been based on the Adopted Residential Conversions SPD (2013), which provides further detail for the adopted policies.

6.3 The main matters to be considered are:

- **Principle of development**
- **The impact on amenity of proposed and existing residents of nearby properties**
- **Transport**
- **Sustainability**

- Environmental matters - Flood risk, air quality
- Equalities impact

Principle of Development

- 6.4 In terms of whether a property is suitable to be converted to a large HMO Policy H8 requires a property to measure more than 120 square metres gross. The property meets this requirement and therefore the conversion into a large HMO would be acceptable in principle.
- 6.5 In order to determine whether the conversion would result in unduly diluting or harming an existing mixed and sustainable community through the significant loss of single family housing, the threshold limit, as set out in the Residential Conversions SPD, is applied (as required under para 4.2).
- 6.6 The SPD identifies that the *“tipping point is when the concentration of HMOs becomes over dominant and the community is no longer considered to be mixed and sustainable.”* The SPD defines that *“planning permission will not normally be granted where the proportion of HMOs will result in HMOs representing 25% or more of the residential properties within a circle of 50m radius measured from the application site”* (para. 5.43).
- 6.7 The concentration of HMOs in the area surrounding the application site has been calculated as a percentage of the total estimated number of existing HMOs (C4 or sui generis) against the total number of residential properties, i.e. those falling with C3, C4 or sui generis HMO use¹. Available data from Environmental Health, Council Tax, extant (unimplemented) permissions for HMOs, data on property websites, and data held by the Planning Enforcement Team, has been used. Where the radius includes entire buildings falling within an A, B, C1 or C2 use class, D or Sui Generis Use Class apart from a Sui Generis HMO, they have been discounted from the total number of buildings in the radius.
- 6.8 The total number of relevant properties (i.e. excluding those wholly in A, B, C1 or C2 uses) within the 50m radius, including the application site, is 24. The total number of properties in HMO use, using the above sources of data, is estimated to be 7 (Including the application site) and therefore the overall percentage is calculated as 29% which is above the threshold of 25%. However, only a few properties within the radius remain as single family houses, and are mainly on Thames Avenue. Given the high proportion of non-residential uses, including hotels, and guest houses, and that the property was previously a guest house, it is considered that the

¹ Any building partly within an A, B, C1 or C2 use class, D or Sui Generis Use Class (apart from a Sui Generis HMO) and partly used as a C3, C4 or sui generis HMO, the C3, C4 or sui generis HMO use still counts towards the threshold calculation.

proposal would not have a significantly detrimental impact on the existing character or composition of the immediate area.

- 6.9 Subject to addressing other policy issues, the principle of the use for a HMO is therefore considered by officers to be acceptable.

The impact on amenity of proposed and existing residents of nearby properties

- 6.10 The Residential Conversions SPD sets out a number of checklist items which provide further detail related to adopted policies H8, CC8 and H10 of the RBLP.
- 6.11 Policy CC8 requires development to not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety.
- 6.12 Policy H10 deals specifically with private and communal space and requires such space to allow for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space.

Room Sizes

- 6.13 The SPD identifies minimum internal floorspace standards (Appendix 1) as 6.5sqm for a single bedroom and 7sqm for a kitchen. The kitchen/living/dining area is shown as 31.95sqm and the smallest bedroom would be 7.2sqm, with the majority of bedrooms larger than this. All the proposed rooms and kitchen meet these minimum sizes.

Communal Space

- 6.14 The SPD identifies that the amount of communal space that is considered appropriate in a large HMO would be dependent on the number and size of bedrooms. The standard set out is for one communal room for every 4-6 bedrooms (depending on the size of the bedrooms). The amended scheme provides for one large communal area on the ground floor of 31.95sqm comprising an open plan kitchen, living and dining area, which can be independently accessed and has direct access to the rear amenity and parking/cycle and bin storage. A number of the bedrooms are of a good size and the communal space is considered to be of an acceptable size and layout to accommodate residents.

Amenity Space

- 6.15 The application site includes a space at the rear, which totals ca. 117sqm, comprising parking, cycle storage, bin storage and amenity area. An amended site plan was submitted which includes an enhanced garden area, which incorporates hard and soft landscaping.

The rear area is accessible from the communal kitchen/ living/ dining area. This is considered to meet the requirements of Policy H10. In addition, the property is close to public areas of open space adjacent to the River.

External windows

- 6.16 All habitable rooms would benefit from external windows.

Privacy and Overlooking

- 6.17 It is not considered that there would be a loss of privacy to surrounding uses and that any overlooking of private spaces would be the same as currently occurs from the present guest house use.

Noise and Disturbance

- 6.18 Policy H8 requires proposals to not create *“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”*.
- 6.19 With regard to stacking and layout the Council’s SPD seeks to avoid layouts which locate living rooms, bathrooms and kitchens, next to, above, or below, proposed or neighbouring bedrooms. The layout largely achieves this with only the communal kitchen/ living/ dining area located next to and below bedrooms. The remainder of the rooms are stacked appropriately.
- 6.20 In terms of existing surrounding residents it would not be expected that the amount of the noise from the property, housing a maximum of eight adults, nor within the garden, would be appreciably different from that generated from the current guest house use when fully occupied. An HMO would be likely to have less comings and goings than a guest house. The property is located on a busy road, so it is unlikely that any external noise generated from an HMO use would be such to that would exceed existing traffic noise.
- 6.21 However, the applicant has confirmed that the following noise mitigation measures have been implemented:
- All front windows replaced with triple glazing. These windows are silenced glass which have 6.4mm laminated on the outside and are toughened on the inside to give minimum vibration. They also have non-metallic spacers offering acoustic comfort.
 - The remainder of the windows have been replaced with ‘A’ rated double glazing;
 - A new trickle vent system has been incorporated into all new windows to reduce the need to open windows to noise exposure.
 - Sound boarding has been undertaken between bathrooms to further mitigate noise levels.

- 6.22 A condition is also included for the submission and approval of a noise assessment to demonstrate acceptable noise levels within the rooms.

Bin storage

- 6.23 Policy H8 requires that bin storage is of an appropriate size and to which there is easy access. Bin storage is proposed within the rear garden and a condition is included to ensure its provision and retention. An informative is included regarding checking requirements with Waste Team. Issues were raised through consultation regarding problems of rats and due to the widespread problem of rats in Reading, especially where there are shared bins, it is important for bin stores to be vermin proof to prevent rats accessing the waste. The condition requires the details of the bin store to be submitted and approved.
- 6.24 An HMO management plan has been submitted and compliance with it is a recommended condition. This includes the management of noise from tenants both within the property and externally within the garden, and dealing with the disposal of waste.
- 6.25 The amended scheme is therefore considered to accord with the relevant policies, which are CC8, H8 and H10.

Transport

- 6.26 The amended proposal includes a rear parking area for 1 no. car parking space. Although this is below standard (of 2 spaces), Transport has confirmed that this would be acceptable due to the specific sustainable location and the presence of existing parking restrictions in the area and subject to no entitlement to parking permits. This is also balanced against the benefits that an enhanced rear amenity space would bring to future occupants. There is proposed cycle storage in the rear garden.
- 6.27 The proposal would therefore accord with policies TR1, TR3, TR4, and TR5 as confirmed by RBC Transport Strategy. Conditions are included for the provision and retention of car parking spaces, the submission of further details of cycle storage to show the layout for the 'Sheffield' type stands, and no entitlement to parking permits.

Sustainability

- 6.28 The National Planning Policy Framework (NPPF, February 2019) states in Paragraph 148: *"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure"*.

- 6.29 Adopted Local Plan Policy CC2 requires new development to reduce the consumption of resources and materials by using designs and site layouts which use *“energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change”*.
- 6.30 The Policy specifically states that *“Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.”*
- 6.31 Policy CC3 requires that all developments demonstrate how they have been designed to incorporate measures to adapt to climate change. Supporting text in para 4.1.8 states that *“The design of developments therefore needs to more carefully consider matters such as shading, insulation and ventilation, surface water runoff and storage and the use of appropriate tree and other planting.”*
- 6.32 Policy CC5 requires minimisation of waste during construction and the life of the development.
- 6.33 The applicant has confirmed that a range of measures have been implemented as part of the refurbishment and conversion as follows:
- Upgrade of the heating system to include a brand new ‘A’ rated Worcester green star condensing boiler, including thermostatic radiators and two joule unvented high recovery hot water cylinders;
 - All bathrooms have been upgraded to include new shower thermostatically controlled shower vales to reduce water consumption;
 - Thermally efficient triple glazed windows to the front and ‘A’ rated double glazed windows elsewhere;
 - Re-insulation of the loft to current standards;
 - Cyclone 7 ventilation incorporated in all bathrooms;
 - Greening of the front garden, and the introduction of soft landscaping to the rear garden and permeable surfacing.
- 6.34 Such measures are considered to accord with Policies CC2, CC3.

Environmental matters

Flood Risk

- 6.35 NPPF paragraph 155 states that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*
- 6.36 Policy EN18 requires that developments are directed to the areas at the lowest risk of flooding, following the Sequential and Exceptions Test set out in the NPPF, and taking account of climate change.

“..... Wherever possible, development should be designed to reduce flood risk, both on- and off-site. ...all new developments in areas of flood risk should give priority to SuDS.”

- 6.37 The front half of the application site is within Flood Zone 2 (pale blue) and the rear part within Flood Zone 3 (darker blue)



- 6.38 NPPF Paragraph 164 does not require this change of use to be subject to a sequential test, but should still meet the requirements for a site-specific flood risk assessment. The previous and proposed use are both classed as more vulnerable uses and the guest house had sleeping accommodation at the ground floor including to the rear of the property. The proposed scheme includes ground floor HMO rooms within the front half of the property only and at first and second floors.
- 6.39 The national ‘Standing advice for vulnerable developments’ requires advice to be followed for surface water management, access and evacuation and floor levels.
- 6.40 The submitted FRA has reviewed all sources of flooding and states that the flood level would be 38.36m AOD in a 1% AEP + 35% for climate change or 1%AEP +70% climate change event. As the existing internal finished floor level is 38.65 AOD to the front and 38.13m AOD to the rear, this would mean that the maximum depth of floodwaters to the rear would be 0.23m in such flood events.
- 6.41 As the flood depth would be less than 0.3m, a mitigation strategy is recommended. The FRA states that raising floor levels to the rear of the building, in accordance with the EA Standing Advice, would not be feasible due to the restricted floor to ceiling height. If raising floor levels above the estimated flood level is not possible then the Standing Advice requires the consideration of ‘extra flood resistance and resilience measures’, which for flood depths of under 300mm relate to the design of the building or development keeping water out as much as possible, i.e. materials should be used with low permeability, so that water cannot pass through.
- 6.42 The FRA includes a water exclusion strategy for the rear of the property and reference is made to the ‘Flood Resilient Construction of New Buildings (MHCLG, 2007) guidance, which suggests various

flood resilient measures that may adopted in residential development. In this instance the following are recommended:

- External render to at least 38.96mAOD (300mm above 1%AEP+35%CC flood level of 38.36mAOD)
- Internal render to at least 38.96mAOD (300mm above 1%AEP+35%CC flood level of 38.36mAOD)
- Air-bricks to be no lower than 38.96mAOD
- No plaster board within 600mm of floor level
- Sealed PVC external framed door recommended to replace existing rear door

6.43 The refurbishment of the property is in progress and the applicant has confirmed that all the measures as set out in the FRA will be implemented.

6.44 Additionally safe refuge would be possible at first floor level in a flood event and the FRA identifies a safe access and egress route through the front of the property and away from flood risk areas.

6.45 It is also required that the residents, site management and site owner should subscribe to the EA Flood Alert and Warning Service.

6.46 In terms of surface water management the FRA recommends that betterment would be achieved over the existing situation with the implementation of a rain water harvesting system (water butts) and permeable paving on hardstanding areas.

6.47 The proposed development is considered to be suitable and accords with Policy EN18, as long as the mitigation measures, including warning procedures can be maintained for the lifetime of the development. A condition is included requiring the measures as set out in the FRA to be implemented and maintained and an amended site plan, as already discussed and agreed with the agent, will be submitted prior to committee and reported in an update, will include for permeable paving, grassed/ landscaped areas.

Air Quality

6.48 The proposed scheme includes for three of the eight bedrooms to be at the front of the property, which has some set back from Caversham Road. There are limited means to reconfigure the internal space and make efficient and viable use of the property. To ensure all bedrooms have an external window it means that some of the bedrooms need to be to the front. The applicant has confirmed that the following mitigation measures have been installed which contribute towards reducing the impacts of air quality within the scheme and are considered to accord with Policy EN15:

- A new trickle vent system has been incorporated into all new windows to reduce the need to open windows.
- Cyclone 7 ventilation is incorporated in all bathrooms; and
- Planting will be installed to the front.

Equalities Impact

- 6.49 In determining this application, the Committee is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7 CONCLUSION

- 7.1 This proposal has been considered in the context of the Reading Borough Local Plan 2019. Although the percentage of HMOs already exceeds the threshold guidance, the addition of another HMO is considered acceptable in this instance, because the existing character of the location is already dominated by a mix of other uses, with very few single family dwellings, and the application site is already an alternative use to a single family dwelling.
- 7.2 This is considered to be mitigated by the provision of residential accommodation, which contributes to overall housing needs, in a sustainable location. The proposal would also reduce risk to occupants through removing a sleeping area within the rear part of the site, which is within flood zone 3, and measures to improve the flood resilience of the property are conditioned. Additionally, there would be improvements to the rear space with respect to secure bin and bicycle storage and an enhanced amenity space, and conditions are included in this regard.
- 7.3 Officers have worked positively and proactively with the applicant on this scheme, and amendments have been secured, which are considered to satisfactorily address policy issues, and overall, officers consider this to be a supportable scheme. It is therefore, recommended for approval subject to conditions and informative.

Case Officer: Alison Amoah

