

PLANNING REF : 261625
PROPERTY ADDRESS : 45 Harcourt Drive
: Reading, Berkshire
: RG6 5TL
SUBMITTED BY : Dr Nina Edwards
DATE SUBMITTED : 23/07/2026

COMMENTS:

I wish to object to this application and ask that the Council carefully assess whether the proposal complies with the requirements of Emerging Local Plan Policy H8 and the wider objectives of protecting residential amenity and highway safety. The applicant expressly relies on Policy H8 in support of the proposal.

1. Insufficient evidence regarding parking demand and highway impacts The proposal seeks to create an 8-bedroom sui generis HMO but provides only two off-street parking spaces, which is the same number currently available for the existing dwelling. The applicant states that there will be no increase in traffic movements and that HMO occupants in this location are likely to have low levels of car ownership. However, no evidence has been submitted demonstrating that the existing parking provision is sufficient for an 8-bedroom HMO or that the proposal would not increase pressure on surrounding streets.

This concern is particularly significant given the local parking context. A 2019 Reading Chronicle article reported concerns from local councillors that parking controls on nearby Pepper Lane had resulted in displacement parking into surrounding residential streets.

Councillors reported that some drivers were avoiding parking charges by parking in neighbouring roads, creating inconvenience for residents and in some cases contributing to obstruction and highway safety concerns.

As a local resident, I have also observed that parking pressures on Harcourt Drive and surrounding roads increase significantly during University term time. Given the site's proximity to the University of Reading, the application has not demonstrated that existing on-street parking capacity can accommodate any additional demand arising from the proposed development. No assessment has been provided of existing parking conditions or the potential impact of introducing an 8-bedroom HMO at this location.

In these circumstances, it has not been demonstrated that accommodation for up to eight occupiers can be adequately served by only two parking spaces. Given the increase in occupation proposed, the application has not provided sufficient evidence to demonstrate that additional parking demand would not place further pressure on Harcourt Drive and surrounding roads.

2. Inadequate assessment of impacts on neighbouring residential amenity

The Design and Planning Statement concludes that no increase in noise is anticipated, but no supporting assessment has been provided. The proposal would accommodate up to eight residents together with visitors, deliveries, refuse generation and increased activity associated with a large HMO. The application contains no meaningful assessment of the implications for neighbouring occupiers arising from increased comings and goings, use of the garden, waste storage, servicing arrangements or cumulative impacts on residential amenity.

Given that the site is located within an established family residential area, I do not believe sufficient evidence has been submitted to demonstrate that neighbouring amenity would be adequately protected.

3. Concerns regarding the reliability of the HMO concentration assessment

Emerging Local Plan Policy H8 states that proposals should not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant overconcentration of flats or HMOs.

The documents submitted by the applicant appear to contain HMO concentration calculations that are mathematically inconsistent. The submitted plan identifies 22 properties within a 50m radius and states that No. 39 is the only licensed HMO, equating to "below 0.05%".

Elsewhere, the Design and Planning Statement states that approval of the proposal would increase HMO concentration to 0.9%.

Based on the figures provided by the applicant, 1 HMO within an area containing 22 properties would represent approximately 4.5% of properties, while 2 HMOs would represent approximately 9.1%. Neither figure appears consistent with the percentages stated within the submitted documents.

The application also provides no explanation as to why a 50m radius has been selected as the basis for assessing HMO concentration or why this should be regarded as the appropriate area for considering cumulative impacts on neighbourhood character and community balance. The Wokingham HMO register identifies further licensed HMOs within the local area, including Nos. 1 and 4 Harcourt Drive. While these properties may fall outside the applicant's chosen 50m radius, their existence raises further questions as to whether the submitted assessment provides a sufficiently accurate picture of HMO concentration and cumulative impact within the surrounding neighbourhood.

Given that the applicant relies on these calculations to demonstrate compliance with Policy H8, I ask the Council to verify the methodology used and ensure that the assessment of existing and proposed HMO concentration is accurate and based on up-to-date evidence before relying upon it in reaching a decision on the application.

4. Lack of supporting evidence for several key assertions

A number of important conclusions in the application are presented without supporting technical evidence, including:

- that there will be no increase in traffic movements;
- that two parking spaces are adequate for an 8-bedroom HMO;
- that noise and disturbance will not increase;
- that refuse storage provision is sufficient.

In my view, further evidence is required before the Council can be satisfied that the proposal would not adversely affect the character and functioning of the surrounding residential area. Thank you for your consideration of these comments.