

PLANNING REF : 252362  
PROPERTY ADDRESS : 21 Milton Road  
: Earley, Berks  
: RG6 1EN  
SUBMITTED BY : The ACER The Whitegates Residents Association  
DATE SUBMITTED : 26/01/2026

COMMENTS:

Planning Application 252362, amended, at 161 Church Road  
(Retrospective)

Changes to roof fenestration plus a canopy to the rear of the ground floor extension.

Objections from ACER, The Whitegates Residents Association.

ACER notes that the revised plans now include plans of the loft conversion, omitted previously. There are no other changes to this Application and therefore ACER's objections remain, as follows:

The premise on which this application is submitted is the false position that the development shown in the drawing P1468-03 entitled "EXISTING PLANS AND ELEVATIONS has already been approved, i.e. submitted for public scrutiny via the planning system. In fact the cumulative piecemeal development at this property has resulted in a greatly extended two-bedroom property which has never been submitted for public scrutiny before, and is now presented as a fait accompli.

Background to Application 252362 at 161 Church Road

1. The first development application which came up before the ETC Planning Committee and public scrutiny was Application 241471 which was validated on 6th June 2024.

2. The 241471 plans submitted for scrutiny notably omitted previously submitted and approved plans for a large dormer loft bedroom conversion, which had been approved only six months earlier, on 9th January 2024.

3. ETC Planning Committee, whilst not objecting to application 241471, recommended the inclusion of a condition stating that implementation of this application was at variance with the earlier approval under 232818, and as such implementation of approval 241471 would negate approval 232818. The inclusion of this condition was rejected by WBC. It is a fact that application 241471 made no reference to or inclusion of the development shown on the plans approved under the previous application 232818. It was reasonable to conclude from this that the applicant had modified the development plans and did not intend to proceed with the dormer arrangement shown on 232818. ETC's suggested condition was reasonable and not at variance with the six tests for conditions within the NPPF.

4. The submitted plans for 241471 also omitted to show a large outbuilding which had been visited by Enforcement under RFS/2024/089148, and subsequently approved as Permitted Development.

5. For WBC Planning to allow Application 241471 to be validated on 11/6/24 without reference to two significant habitable additions to

the property was un-professional and led to misrepresentation of the scale and extent of the intended development.

6. It is notable that the development was never built to the drawings submitted and approved under 241471, therefore bringing the public approval and scrutiny process of planning applications into disrepute.

7. The property is purporting to have been built to the drawings now re-submitted under 252362. A retrospective application, which is an accumulation of three approvals, each separately assessed, plus changes to fenestration and the addition of a small canopy

8. The cumulative impact of this development is far more significant than the plans submitted for public scrutiny prior to building work commencement. This has resulted in complaints concerning intrusion and loss of privacy from disadvantaged neighbours, who never had available the drawings of the property which was to be built.

9. The piecemeal process has resulted in a deception concerning the intended development which has now been constructed.

#### Current Application at 161 Church Road

10. The current application purports to show an as-built development as shown in the latest drawing P1468-03 titled "Existing Plans and Elevations" that has had no approval in its completed form. This is not mentioned within the application and is therefore misleading. The elevations simply show the existing, unapproved, completed structure, which is an amalgamation of two previously approved applications, with neither of those applications recognising the other.

Consequently, those earlier approvals do not relate to the as-built situation.

11. It is noted that the latest drawing includes the floor plans of the loft conversion with its en-suite bedroom. This makes the property a potential five-bedroom HMO. The original house was, according to the drawing plan P1468-02, a two-bedroom property.

12. Allocated parking for two cars at this 5 bedroom development is woefully inadequate and will result in additional unwanted on-street parking in Palmerstone Road, a designated primary cycle route. Policy CC07 states that in addition to demonstrating how the proposed parking meets the current Parking Standards, the new scheme is to retain an appropriate level of off-street parking. Neither requirement has been met for this 5 bedroom property with six habitable rooms, where a minimum of five cars can be expected to be associated with this development.

13. No provision for soft landscaping is shown in the plans. It is important to retain soft landscaping in the front garden in order to integrate with the character of the area, and indeed is required under policy CP3(f), and TB06 as well as the Borough Design Guide, which states that parking spaces should include spaces for soft landscaping.

14. ACER notes that the total increased habitable area is approximately 104 square metres and therefore potentially liable to CIL, but there are no area figures on the drawings.

15. Overall, the extension has a dominating impact on the front elevation and is not subservient to the main property, contrary to the Borough Design Guide which states that alterations and extensions should be clearly subservient to the form and scale of the original building. The original hipped roof has been replaced with a part gable part hipped extension which is of poor design and not in keeping with the form of the original building.

#### Summary

- Existing Plans and Elevations have never been approved.
- Over development of this two bedroom property with the following consequences:
  - o The extension is not subservient to the host dwelling. (Ref Borough Design Guide)
  - o The hipped roof has been replaced with a part gable end which is not in keeping. (Ref Borough Design Guide)
  - o Overlooking into previously private areas of neighbouring gardens is unacceptable.
  - o Parking provision is insufficient for a five-bedroom property. (Ref CC07)
- There is no soft landscaping in the front garden to comply with Policy TB06 and the Borough Design Guide.
- CIL liability threshold is not proven

ACER therefore request refusal of this application.

Should Planning be minded to Approve this application, then ACER request a landscaping condition is attached in order to comply with WBC policies CP3, TB06, and the Borough Design Guide in order to retain the green character of the area. Screening to minimise overlooking and loss of privacy in the garden of 89 Eastcourt Avenue in particular should be included.