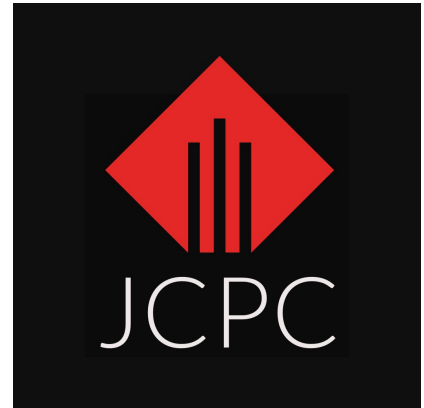




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APPLICATION FOR FULL PLANNING PERMISSION
FOR ALTERATIONS TO THE EXISTING ROOF TO
FORM TWO 2-BEDROOM APARTMENTS AT
SECOND FLOOR LEVEL, WITH SUB-DIVISION OF
TWO EXISTING TWO-BEDROOM FIRST FLOOR
APARTMENTS TO FORM FOUR 1-BEDROOM
APARTMENTS TOGETHER WITH ASSOCIATED
WORKS INCLUDING PARKING AND CYCLE
STORAGE PROVISION FOLLOWING THE
DEMOLITION OF EXISTING OUTBUILDINGS AT 18-
32 LONDON ROAD, TWYFORD, BERKSHIRE

PLANNING, HERITAGE AND DESIGN AND ACCESS STATEMENT

JANUARY 2025

STRUCTURE

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1.0 Introduction

1.1 This Statement has been prepared to accompany an application submitted to Wokingham Borough Council for full planning permission for alterations to the existing roof to form two 2-bedroom apartments at second floor level, with sub-division of two existing two-bedroom first floor apartments to form four 1-bedroom apartments together with associated works including parking and cycle storage provision following the demolition of existing outbuildings all at 18-32 London Road, Twyford, Berkshire.

1.2 The Statement is structured as follows;

- Section 2 – The Site and Surrounding Area
- Section 3 – Planning History
- Section 4 – The Proposals
- Section 5 - Planning Policy Context
- Section 6 – Planning Assessment
- Section 7 – Conclusions

2.0 The Site and Surrounding Area

- 2.1 The site is located on the south-eastern side of London Road, a short distance to the east of the junction with Church Street. The site, which has an irregular shape and extends to an area of approximately 0.12 hectares, currently contains (on the northern section of the site and fronting on to London Road) a two-storey 1960's building containing commercial uses at ground floor with three apartments at first floor level accessed via an external staircase/walkway on the rear elevation. The building incorporates a brickwork external finish at ground floor level with, across the majority of the frontage save for the eastern (lower) end, a rendered first floor, all under a pitched slate roof incorporating parapet roof detailing, with lower ridge line at the eastern end of the building.
- 2.2 The ground floor section of the building extends further rearwards of the remainder, facilitating a walkway to access the first-floor apartments, with the external staircase located in the eastern section of the site. The area to the rear is largely hard surfaced and used as a yard and for parking purposes. A series of modern/utilitarian single storey garage buildings are located on the south-western boundary of the site. Access to the site is from the east, off The Grove.
- 2.3 The site is within the Twyford Local Centre and forms part of the Primary Shopping Area. To the west and north of the site are a series of commercial buildings incorporating (upper level) residential accommodation. To the east of the site, and located on the western side of the junction of London Road and The Grove, is the Grade II* listed Harrison Almshouses. Modern residential development – comprising two-storey terraced houses – is located to the south-east of the site with associated garage facilities, with more historic residential and commercial development to the south-west, including the Grade II listed 14 (Welford Cottage) and 16 London Road.
- 2.4 The extent of the site is shown outlined in red on the site location plan accompanying the application and, in addition to the designations noted above, is located (partially) within the Twyford Conservation Area.

3.0 Planning History

- 3.1 The site has a short, but highly material, planning history all as detailed below.
- 3.2 In July 1964 outline planning permission (O/142/64) was granted for the erection of shops with flats over. That was followed by an approval of Reserved Matters (R/338/66) in November 1966. Permission (R/43/69) was then granted for use of a first floor flat as a showroom and office, albeit it is unclear if this permission was implemented. In 1971 permission (1085/71) was granted for a new shop front, with retrospective approval (F/1996/63311) granted in 1996 for the installation of a satellite dish on the rear wall of the building.
- 3.3 Planning permission (201119) was then granted in June 2020 for the change of use of one of the ground floor units (22 London Road) from a retail use to a chiropractic clinic. At around the same time, permission (200795) was granted for the demolition of the existing garage building to the rear of the site and the erection of replacement garaging.
- 3.4 Most recently – and most materially in the context of the current proposals – an application (223577) was submitted in November 2022 for the raising of the roof to create additional habitable accommodation to form 2 No. 2 bed apartments together with associated works including the erection of dormer windows, parking and cycle storage provision following demolition of existing outbuildings. That application, details of which are shown in the plans attached at **Document 1**, was approved in July 2023 and remains extant.

4.0 The Proposal

- 4.1 As noted, the application seeks full planning permission for alterations to the existing roof to form two 2-bedroom apartments at second floor level, with sub-division of two existing two-bedroom first floor apartments to form four 1-bedroom apartments together with associated works including parking and cycle storage provision following the demolition of existing outbuildings, full details of which are set out in the following plans and documents:
- 2025 01A Site Location Plan (1:1250) and Site Plan (1:200)
 - 2025 02 Existing Floor Plans and Elevations (1:100)
 - 2025 03 Proposed Floor Plans (1:100)
 - 2025 04A Proposed Elevations (1:100)
 - Cycle Store Technical Detail
 - CIL Form
- 4.2 As detailed in the above noted plans, the proposal involves adding a new pitched roof over the western part of the subject building to facilitate the creation of two additional 2-bedroom apartments. The proposed new roof – which would be finished with hand made plain clay tiles (including to the lower roof section on the eastern part of the building) - would maintain the existing parapet roof detail, with the angle of the roof pitch increased, resulting in the ridge height being raised by approximately 1.60m. The proposed apartments would be set within the new roof, lit by a series of lead clad dormer windows along the front and rear elevation. All new windows would be traditionally detailed with softwood framing, as would the replacement windows at first floor level in the front elevation¹. In addition, it is proposed to re-render the front elevation of the building at first floor level and, in the process, remove all the surface wiring and mounted equipment that 'sits' above the existing shopfronts.
- 4.3 Access to the proposed second floor apartments would be from the rear via the existing walkway that extends, at first floor level, across the front (south-east) elevation of the existing apartments.
- 4.4 The existing apartments at first floor level comprise two 2-bedroom units. As shown on plan 03, each would be subdivided to form two 1-bedroom apartments (four in total). This would necessitate alterations across the first-floor rear elevation through the provision of new entrance door openings and changes to the fenestration.

¹ That are currently white UPVC.

- 4.5 In addition, it is proposed to demolish the existing modern garage buildings located adjacent to the south-west boundary, with parking within the 'cleared' area and in the central yard directly to the south-east of the existing building. A cycle store is proposed in the southern section of the site.
- 4.6 It should be noted that, by comparison with the extant planning permission (223577), the proposed roof alterations are identical to that scheme, save for the provision of an additional (central) dormer on the front elevation and the omission of a velux roof light that was approved centrally in the rear elevation of the building. Moreover, the proposed car parking arrangements are also identical to the approved scheme, with the only change therein relating to a slightly larger cycle store adjacent to parking space 9. The principal changes to the approved scheme are, therefore, at first floor level (both internal and external) in association with the sub-division of the existing apartments.

5.0 Planning Policy Context

The Decision-Making Framework

- 5.1 The statutory decision-making framework is set by Section 38(6) of the Planning and Compulsory Purchase Act 2004. This States:

'if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'.

- 5.2 That is, where the Development Plan is material to the determination of a planning application, the decision should be made in accordance with the terms of the Development Plan unless there are material considerations that would direct otherwise.
- 5.3 This statutory framework for decision-making is reinforced by paragraph 11 of the National Planning Policy Framework (the Framework; 2024) which states that decisions should apply a presumption in favour of sustainable development and that development proposals should be approved where they accord with an up-to-date Development Plan. (Paragraph 11(c)).

Development Plan

- 5.4 The Development Plan comprises a range of planning documents the most relevant of which are considered to be -
- Wokingham Borough Core Strategy DPD (2010);
 - Wokingham Managing Development Delivery Local Plan (2014); and
 - The Twyford Neighbourhood Plan.

Wokingham Borough Core Strategy DPD

- 5.5 The Wokingham Borough Core Strategy Development Plan Document was adopted by the Council in January 2010 and provides the strategic planning policy framework for development in the Borough to 2026. The most relevant policies of the Core Strategy are considered to be:
- CP1 Sustainable Development

- CP3 General Principles for Development
- CP4 Infrastructure Requirements
- CP5 Housing Mix, Density and Affordability
- CP6 Managing Travel Demand
- CP7 Biodiversity
- CP9 Scale and Location of Development Proposals
- CP13 Town Centres and Shopping
- CP17 Housing Delivery

Wokingham Managing Development Delivery Local Plan (2014)

5.6 The Wokingham Managing Development Delivery Local Plan was adopted in February 2014 and provides a series of detailed policies that 'sit' alongside the strategic framework provided by the Core Strategy. The most relevant policies of the document are considered to be:

- CC01 Presumption in favour of Sustainable Development
- CC02 Development Limits
- CC03 Green Infrastructure, Trees and Landscaping
- CC04 Sustainable Design and Construction
- CC06 Noise
- CC07 Parking
- CC09 Development and Flood Risk
- CC10 Sustainable Drainage Design Beyond the Conservation Area
- TB05 Housing Mix
- TB07 Internal Space Standards
- TB15 Major Town and Small Town/District Centre Development
- TB16 Development for Town Centres
- TB17 Local Centres and Neighbourhood and Village Shops
- TB21 Landscape Character
- TB23 Biodiversity and Development
- TB24 Designated Heritage Assets

Twyford Neighbourhood Plan

5.7 The Twyford Neighbourhood Plan (TNP) was formally 'made' in August 2023 with the most relevant policies of the document are considered to be:

- TW1 Encouraging Sustainable Travel
- TW4 A Thriving Village Centre
- TW5 Village Centre Regeneration Area
- TW7 Nature Recovery and Climate Change
- TW8 Tree Canopy Cover
- TW10 Water Infrastructure and Flood Risk
- TW11 New Homes – Tenure and Mix
- TW13 Design Codes

Other Material Planning Considerations

National Planning Policy Framework (NPPF)

- 5.8 The NPPF was first published on 27 March 2012 and, with immediate effect, replaced a raft of advice and guidance contained in various Planning Policy Guidance notes (PPGs), and Planning Policy Statements (PPSs). In July 2018 a revised version of the NPPF was issued (NPPF2), followed by further revisions in February and June 2019 (NPPF3). In July 2021 a further set of revisions to the Framework were published (NPPF4), with further changes in September 2023 (NPPF5). Further revisions were published on 19th December 2023 (NPPF(6)), with the latest version (NPPF(7)) issued on 12th December 2024.
- 5.9 As with the original (2012) NPPF, sustainable development remains at the heart of the Framework, with three interdependent and overarching objectives – economic, social and environmental – driving the achievement of sustainable development. In order to ensure that sustainable development is pursued in a positive manner, the Framework embodies, in paragraph 11, a presumption in favour of sustainable development.
- 5.10 For decision-taking – in respect of applications for planning permission – the presumption in favour of sustainable development means (paragraph 11):
- (c) approving development proposals that accord with an up-to-date development plan without delay; or
 - (d) where there are no development plan policies or the policies which are most important for determining the application are out-of-date, granting planning permission unless:

- (i) the application of policies in this Framework that protect areas of assets of particular importance provides a clear reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 5.11 Paragraph 39 advises that local planning authorities should approach decisions on development in a positive and creative way and *'work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

Delivering a Sufficient Supply of Homes

- 5.12 In terms of housing, paragraph 61 re-affirms that, in order to support the Government's objective of significantly boosting the supply of homes, *'it is important that a sufficient amount and variety of land can come forward where it is needed'*. Paragraph 73 recognises the value and contribution that small and medium sized sites can make to meeting housing requirements and states that, through the development plan, land to accommodate at least 10% of housing requirements should be on sites no larger than one hectare.

Promoting Sustainable Transport

- 5.13 Insofar as it relates to matters of sustainable transport, paragraph 110 advises that significant development should be focused on locations that are, or can be made, sustainable. However, the Framework recognises that *'opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'* (paragraph 110).
- 5.14 In consideration of applications for planning permission, paragraph 115 advises that it should be ensured that – (i) sustainable transport modes are prioritised taking account of the type of development and its location, (ii) safe and convenient access to the site can be achieved for all users, (iii) all transport elements of a scheme are appropriately

designed, and (iv) any significant impacts of the development on the transport network, or highway safety, can be mitigated to an acceptable degree.

- 5.15 Furthermore, paragraph 116 advises that *'development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*.

Making Effective Use of Land

- 5.16 Paragraph 124 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. In addition, development should make efficient use of land (Paragraph 129) taking account of a range of factors, including the need for different types of housing, and the desirability of maintaining an area's prevailing character and setting.

Achieving Well-Designed Places

- 5.17 Paragraph 131 highlights that good design is a key aspect of sustainable development by creating better places in which to live and work, with paragraph 135 seeking developments that:

- will function well and add to the overall quality of the area;
- are visually attractive as a result of good architecture;
- are sympathetic to local character and history;
- establish or maintain a strong sense of place;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and
- create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.

- 5.18 Paragraph 139 states that development that is not well designed should be refused, especially in circumstances where it fails to reflect local design policies and government guidance on design. Conversely, significant weight should be given to development that reflects local design policies and government guidance and/or represents outstanding or innovative designs that promote high levels of sustainability.

Meeting the challenge of climate change, flooding and coastal change

- 5.19 Paragraph 170 advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is proposed, local planning authorities (paragraph 181) should ensure that flood risk is not increased elsewhere and that, as appropriate, development should be supported by a site-specific flood risk assessment

Conserving and enhancing the natural environment

- 5.20 Paragraph 187 advises that planning policies and decisions should contribute to, and enhance, the natural and local environment by, *inter alia*, (a) protecting and enhancing valued landscapes, (b) recognising the intrinsic character and beauty of the countryside and (d) minimising impacts on and providing net gains for biodiversity.

Conserving and enhancing the historic environment

- 5.21 Paragraph 207 requires that applicants should describe the significance of any heritage assets (and their setting) that may be affected by a development proposal, with the level of detail proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance.
- 5.22 When considering the impact of a proposed development on the significance of a heritage asset (including matters of setting), paragraph 212 advises that great weight should be given to the asset's conservation. Any harm to, or loss of, significance of a designated heritage asset (including within its setting) should require clear and convincing justification (paragraph 213). Where a proposed development would lead to substantial harm to a designated heritage asset, paragraph 214 advises that consent should be refused unless it is demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefit that outweighs the harm or loss.
- 5.23 Where (paragraph 215) the harm to the significance of a heritage asset is deemed less than substantial, that harm should be weighed against the public benefits of the scheme, including (where appropriate) securing the optimum viable use.

Other Matters

- 5.24 The following Supplementary Planning Documents are also considered to be material to the proposals:

- The Borough Design Guide; and
- The Sustainable Design and Construction SPD

5.25 In addition, the Twyford Design Guideline and Codes (2022) is of material weight in the consideration of the proposals.

6.0 Planning Assessment

6.1 This section of the Statement considers the principal planning issues associated with the proposed development having regard to the following factors:

- The Decision-Making Framework and Housing Land Supply
- The Principle of the Proposed Development
- Impact on the Character and Appearance of the Area, including Designated Heritage Assets
- Effect on Neighbouring Amenity
- The Quality of Living Environment for Future Occupiers
- Existing and Proposed Landscaping
- Highways, Access and Parking
- Flood Risk
- Ecology and Biodiversity

6.2 These matters are considered in turn below.

The Decision-Making Framework and Housing Land Supply

6.3 As detailed in the preceding Section, Paragraph 11(d) of the Framework states that where there are no development plan policies or the policies which are most important for determining an application are out-of-date, planning permission should be granted for that development (subject to the caveats in 11(d)(i) and (ii)). The footnote to paragraph 11(d) elaborates on the circumstances when development plan policies may be considered out of date, and includes in situations where the Council are unable to demonstrate a five-year supply of housing land. That is the case in this instance, with the Council only able to demonstrate a circa 3.2-year supply. That being so, the 'tilted planning balance' set out in Paragraph 11(d) of the Framework is engaged.

6.4 Whilst it is acknowledged that the terms of the 'tilted planning balance' are tempered where the policies of the Framework that protect areas or assets² of particular importance provide a strong reason for refusing development, it is nevertheless the case that any adverse impacts would also need to significantly and demonstrably outweigh the benefits of the scheme. Although that assessment forms part of the analysis below – and concludes that the proposals would be consistent with Development Plan policy and all other

² In this case potentially Heritage Assets.

material considerations – it is nevertheless the case that there is a presumption in favour of granting planning permission.

The Principle of the Proposed Development

- 6.5 The site is located within the Development Limits of Twyford wherein the principle of additional residential development is acceptable in accordance with Policy CP9 of the Core Strategy and CC02 of the Managing Development Delivery Local Plan (2014). Furthermore, Policy TB15 of the latter supports the concept of residential units above ground floor commercial units/uses in the centre of Twyford Village, whilst the proposals would – in accordance with the Framework – also make more effective and efficient use of land in a highly sustainable location.
- 6.6 Accordingly, and recognising the materiality (in terms of matters of principle) of the extant planning permission for additional residential development on the site, the principle of the proposed development is considered to be acceptable.

Impact on the Character and Appearance of the Area, including Designated Heritage Assets

- 6.7 As detailed in Section 2.0, the following heritage assets are potentially affected by the proposed development:
- The Twyford Conservation Area; and
 - The setting of the following Listed Buildings
 - Harrison Almshouses (II*)
 - 14 (Welford Cottage) and 16 London Road (II)
 - Apsley House (II)

The extent/location of these assets are shown illustratively in Figure 1 below, with the potential effect of the proposals on the significance of these designated heritage assets are considered in turn.

The Twyford Conservation Area.

- 6.8 As shown in Figure 1, the majority of the site is located in the Twyford Conservation Area, the boundary of which runs through the yard area to the south of the main building. The Conservation Area document prepared by the Council details:

- That the Conservation Area is focused on the High Street and London Road;
- That building styles within the Conservation Area are '*generally modest with a mixture of rendered and red brick frontages. Building heights vary between two and three storeys with gabled dormer windows in the roofs*'
- That the 'diverse' area contains properties dating as far back as the sixteenth century.



Figure 1: Designated Heritage Assets

6.9 Within this context, 18-32 London Road comprises a late-1960's/early-1970's two-storey terrace typical of the era with ground floor commercial uses and first floor apartments. The age and general design and character of the building offers little, if any, positive contribution to the special interest of the Conservation Area. Indeed, there are features of the appearance of the building that, if anything, detract from the contribution of the building to the Conservation Area, including the shopfront designs, the UPVC window openings, the wiring and surface mounted structures on the front elevation of the building and the squat/disproportionately low pitch of the roof of the building.

- 6.10 The proposals, as detailed in the plans submitted herewith, would increase the pitch of the roof of the western section of the building resulting in the overall ridge height of this part of the building being increased by approximately 1.6m. Whilst, somewhat inevitably, this would increase the visual presence of the building in the street scheme, it would only do so to a marginal extent in effectual terms. Indeed, the existing building is a clearly evident/visible feature of the street scene – where it ‘sits’ in a group of buildings forming part of the centre of Twyford and that show a wide variation in scale/height, from single storey to three-storey. In this context, the increase in height of the building – which would remain approximately 1.0m lower than the Waitrose Store opposite the site (on the north-western side of London Road) – and the creation of an additional level of accommodation (albeit set in to the roof of the building) would reflect the mix/varied scale of buildings in the area and would not appear unduly prominent or visually intrusive in the street scene.
- 6.11 Moreover, elements of the design detail of the scheme – such as the leaded flat roof dormer windows sat just above parapet roof – would reflect established forms of development in the area (including the Grade II Listed Apsley House opposite the site), whilst other aspects of the scheme, such as replacement and new softwood windows, new hand made plain clay roof tiles, re-rendering of the frontage, and the removal of wiring and surface-mounted paraphernalia, would also represent a visual improvement to the appearance of the building and the contribution to the special interest of this part of the Conservation Area.
- 6.12 Other elements of the scheme – such as the removal of the outbuildings/garages to the rear and the parking alterations - would have a less direct effect on the Conservation Area and, that being so, these aspects of the scheme would not materially impact on the designated heritage asset.
- 6.13 Accordingly, and for the reasons set out, it is considered that the proposals would preserve the special interest and character and appearance of this part of the Conservation Area in accordance with adopted Development Plan policy and advice in the Framework.

The Setting of Listed Buildings

- 6.14 As detailed in paragraph 6.7 the site/building falls within the setting of the following listed buildings:
- Harrison Almshouses (II*)
 - 14 (Welford Cottage) and 16 London (II)

➤ Apsley House (II)

The relationship to, and effect on, the setting of these listed buildings is considered further in the following paragraphs.

Harrison Almshouses

- 6.15 Harrison Almshouses, which is a Grade II* listed building located directly to the east of the site, was added to the statutory list in 1952 and described therein as:

'Almshouses. 1640. Brick. Old tile roof. U-plan with coped gable ends. One storey, brick dentil eaves. Road front: tall flanking chimneys and central gabled porch with moulded brick coping and remains of brick finial. Central 3-centred arched opening moulded and splayed, with moulded brick pediment over and carved stone date panel in gable. The porch is flanked on each side by 3 bays and 3-light leaded casements in wood frames. In the courtyard formed by the projecting wings on the south-east side, the doors and windows have been altered. The wings are joined by a brick wall with central gateway with brick pediment on the axis of the main door. 6 tall chimneys project at regular intervals on east and west outer walls. Interior: original brick fireplaces and old ledged doors. The court room to the right of the entrance has a contemporary panelled dado and screen to passage, with heavy moulded stiles and tails, small rectangular panels and 2 arched doorways with small key blocks. These doorways originally had dog-gates, now boarded over'

- 6.16 As is evident from the listing description, much of the special interest of the Harrison Almshouses rests with the age, physical form, composition and architectural modulation of the building, with the setting of the building having changed considerably in the last 50 years. Indeed, Figures 2 (1897), 3 (1932) and 4 (1951), indicate that the Almshouses historically occupied a rectangular plot with a wide frontage along the south-eastern side of London Road. The 'U-shaped' building is clearly located in the centre of the plot with (1932) two equally sized areas of enclosed space to the east and west – presumably amenity/garden land – with small buildings shown in the north-eastern and south-western corners of the amenity land. There is little discernible difference to the immediate curtilage/setting of the building up to 1951.



Figure 2: 1897 Ordnance Survey



Figure 3: 1932 Ordnance Survey



Figure 4: 1951 Ordnance Survey

- 6.17 At some point after 1951, the eastern parcel of land to the Almshouses was developed through the continuation of The Grove (northwards of Lansdowne Terrace up to London Road), with the (new) road located close to the north-east flank of the Almshouses. Then, in the late 1960's, planning permission was granted for the development of the western parcel of land in the form that exists today, accessed via the service road to the south that, up to that point, appeared to provide an informal pedestrian link between Old London Road and Lansdowne Terrace. Both acts (the extension of The Grove and the provision of the subject building) significantly and fundamentally changed the historic setting of the Almshouses such that any value/contribution that the site may have once made to the setting of the Almshouses was eroded at this point.
- 6.18 Given this context, the key issue arising from the proposed development – recognising the significance of the extant planning permission as detailed below in paragraphs 6.27 to 6.31 - is simply whether the modest increase in height of the building would materially alter the appreciation of the Almshouses in what is now a very mixed, largely commercial/residential setting. In this regard, the increase in height would be contained to the western section of the building, which is off-set from the south-western flank of the Almshouses by approximately 11.0m. This degree of separation, combined with the minimal increase in height and the gradation of scale with the lower (eastern) section of the subject building, ensures that the physical works would not materially alter, nor change, the appreciation of the Almshouses or those factors that contribute to its special interest that, as noted above, is now largely limited to the architectural form and composition of the building.
- 6.19 Accordingly, and for the reasons set out, it is considered that the proposals would have a neutral effect on the setting of the Grade II* listed Harrison Almshouses.

14 (Welford Cottage) and 16 London Road

- 6.20 14 (Welford Cottage) and 16 London Road are a pair of late Eighteenth Century two-storey brick cottages with slate roof located to the south-west of the site, directly adjacent to the existing garage/outbuildings. As with Harrison Almshouses, their special architectural interest derives principally from their age, materials, detailing and composition, with the historic curtilages (as evident in the 1897 and 1932 plans) extending northwards, in a linear form up to London Road, much in the same way that they do today.
- 6.21 For similar reasons to those set out above in relation to Harrison Almshouses, the wider setting of the buildings has changed considerably in the last 50 years but, due to the lack of an historic connection with the application site and the distance/juxtaposition from the

main building, the proposed roof alterations would not result in a form of development that would have a material effect on the setting of the building.

6.22 Moreover, the removal of the modern outbuildings (even if already approved and extant) on the south-western section of the site and the retention of the resultant area in an open form would maintain, and potentially enhance, the setting of these buildings.

6.23 Given such, the proposals would not have a detrimental impact on the setting of 14 (Welford Cottage) and 16 London Road.

Apsley House

6.24 Apsley House is an attractive, Grade II Listed Eighteenth Century building located directly opposite the site (on the north-western side of London Road) that has been extended in both the Nineteenth and Twentieth Century. As shown in Figure 5 below, the special interest of the building is, again, a product of the age, form, detailing, materials and composition of the building.

6.25 The setting of the building has, as described above, undergone significant change over the last 50 years including – in the last 25 years – the construction of a large plate Waitrose food store directly to the north-east and which incorporates a significant part of the original curtilage of the property. To that extent – and given the scale of the Waitrose Store (approximately 1.0m higher than the building as proposed to be extended) – the increase in the height of the subject building and the visual relationship to Apsley House, is such that the proposed development would not detract from, or harm, the setting of Apsley House.



Figure 5: Apsley House

6.26 For these reasons, therefore, the proposals would also preserve and maintain the significance of the setting of surrounding listed buildings in accordance with adopted Development Plan policy and advice in the Framework.

6.27 Notwithstanding the conclusions outlined above it is recognised that the Council's Heritage Officer, when assessing the comparable scheme submitted (and approved) in 2022 / 2023, concluded that the proposals – as a result of the raising of the roof of the building - would detract from the character and appearance of the Conservation Area and have a harmful impact on the setting of Harrison Almshouses. On the scale of impact, the Heritage Officer considered that the level of harm would be 'less than significant'.

6.28 That harm, whilst not accepted by the applicant, was nevertheless weighed in the overall planning balance by the Planning Officer, with their report highlighting a number of positive aspects to the scheme, including:

- The provision of two additional dwellings contributing to housing land supply;
- Direct and indirect job creation during the 'build out' process of the development;
- Additional local expenditure from the increased resident population, particularly in the village centre;
- Residential development in a highly sustainable location with access to various (non-car) modes of transport; and
- The provision of enhanced sustainability measures.

6.29 In this context, it was concluded in the Officer Report that:

it is considered that the public benefits of the scheme outweigh the less than substantial harm to the significance of the designated heritage assets with enhanced benefits resulting from increasing the provision of residential flats through alterations to the existing building. When applying weight to the economic, social and environmental benefits of the scheme, no adverse harm has been identified which would significantly and adversely outweigh the identified benefits as required by paragraph 11 of the NPPF.

6.30 In the event that the Council's Heritage Officer re-affirms the opinion that the current proposals would result in less than substantial harm to the significance of designated heritage assets and their setting then, for the comparable reasons to those set out above, it is respectfully suggested that the same conclusion arises when carrying out the planning balance required by Paragraph 11 of the Framework. Moreover, the following factors should be attributed greater positive weight in support of the scheme than would have been the case in the assessment of the most recent application:

- There is now an extant planning permission (223577) for a series of extensions and alterations to the building that, outwardly, do not materially differ from the terms of the current proposal. The existence and complementarity of this planning permission

represents a 'fall back' position of substantial weight in the overall planning balance;
and

- Unlike the extant permission – which resulted in a net increase in the number of dwellings of two – the proposals would result in a net increase of four dwellings, that would make a proportionality more valuable contribution to the housing supply deficit.

6.31 Accordingly, and even if it is concluded that there would be less than substantial harm to designated heritage assets, that harm would continue to be outweighed by the public benefits of the scheme, as was the case with application 223577.

Effect on Neighbouring Amenity

6.32 The relationship with existing residential properties surrounding the site is such that the neither the proposed increase in height of the building, nor the provision of two apartments with associated window openings (or the subdivision of the first-floor units with associated works), would compromise neighbouring residential amenity in terms of matters of light, outlook and privacy. Indeed, it should be recognised that the impacts in this regard would not materially differ from the terms of the extant planning permission that was found to be acceptable in these respects.

The Quality of Living Environment for Future Occupiers

6.33 As shown on Plan 03, the proposed roof level apartments would have a gross internal floor area of 63.2sqm. This would exceed the minimum standard (61sqm) for a two-bedroom three-person apartment as set-out in the Technical Housing Standards – Nationally Described Space Standard. Moreover, the apartments would be dual aspect, thereby benefitting from an appropriate level of natural daylight and sunlight, with neither apartment overlooked or otherwise compromised in privacy terms. Accordingly - and again recognising the materiality of, and significant weight to be attached to, the extant planning permission (which includes identical apartments to those proposed at roof level) an acceptable and appropriate quality living environment would be provided for future occupiers.

6.34 The scheme also includes the sub-division of the two existing first floor apartments to provide four 1-bedroom apartments. As indicated on plan 03, these would vary in size

between 50sqm and 54.5sqm. In all cases the floor area would meet and exceed the requirements for a one-bedroom 2-person apartment as set out in the above noted Housing Standards. Furthermore, and for similar reasons to those set out above, occupiers would benefit from appropriate levels of light and outlook secured, in part, by the fact that each apartment would be dual aspect.

- 6.35 Accordingly, it is considered that an appropriate standard of amenity would be provided for future occupiers of each of the apartments.

Existing and Proposed Landscaping

- 6.36 There are no existing trees (or other vegetation) on the site that make a significant and meaningful contribution to the character and visual amenities of the area and, that being so, there are no constraints to the proposed development in this regard. Furthermore, whilst it is acknowledged that there are a number of trees close to the boundary of the site (within adjoining land) the relationship to these trees would – in terms of the potential effect of the related 'developed' areas – not materially differ from the terms of the extant planning which was found to be acceptable in this respect (albeit subject to a condition requiring the submission of an Arboricultural Method Statement and Scheme of Works (including tree protection measures) that could be re-imposed).
- 6.37 No significant additional landscaping is proposed on the site as part of the proposed development. Indeed, given the terms of the proposed scheme (roof alterations) and the extant planning permission, it is not considered that additional (soft) landscaping is required in order to ensure an acceptable form of development.

Highways, Access and Parking

- 6.38 No alterations are proposed to the vehicular site access arrangements, which would continue to be from the east off The Grove and which – in application 223577 – was found to be acceptable by the Highway Authority. Given that there has been no material change in circumstances since permission 223577 was granted and that the proposals would not otherwise alter the intensity of use of the access, these arrangements are considered to remain acceptable.
- 6.39 In terms of parking, and as detailed in the Officer Report in connection with permission 200795 and acknowledged by the Highway Authority in relation to the extant permission (223577), the western part of the site currently provides parking for seven vehicles in the form of three parking spaces and four garages. The proposals – which as per the extant

planning permission involve the demolition of the existing buildings – would result in the provision of nine parking spaces in the same area, a net increase of two parking spaces.

- 6.40 Given that the parking would be provided on an 'unallocated' basis, the provision of nine parking spaces for the totality of the development (including the existing first floor flat at the eastern end of the building that would be unchanged in the scheme) would comply with the Council's standards for such.
- 6.41 In addition, and as shown on the site plan, cycle storage is proposed adjacent to parking space 9. The principle of a cycle store in this location is established by virtue of the extant planning permission and, whilst this has been increased in size to meet the relevant requirements given the altered size/number of flats, the arrangement is considered to remain acceptable and appropriate.
- 6.42 Accordingly – and notwithstanding the highly sustainable location of the site and the ready access to alternative (non-car) modes of transport and local services and facilities – the proposed vehicular and cycle parking arrangements are considered to be acceptable.

Flood Risk

- 6.43 Data held by the Environment Agency (EA) indicates that the site – for fluvial flooding purposes - is located in Flood Zone 1 and, therefore, suitable as a matter of principle for the proposed development. Furthermore, the EA evidence details that the site is not subject to surface water flooding, nor flooding from any other source (natural or artificial). Accordingly, flooding matters are not considered to represent a constraint or limitation to the proposed development.

Ecology and Biodiversity

- 6.44 The previous application (223577) was accompanied by a Preliminary Bat Roost Assessment and, subsequently, a series of bat emergence surveys that confirmed that there were no bats observed emerging from the site. Given such, and that fact that the proposed roof alterations could be carried out under the terms of the extant planning permission, it follows that there are no constraints to the proposed development in this respect.

- 6.45 Furthermore, the proposals are not subject to the Biodiversity Gain Condition (that would otherwise be required by virtue of Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990) on the basis that the works fall within the 'De Minimis' exemption.
- 6.46 Accordingly, there are not considered to be any ecological or biodiversity constraints to the proposed development.

7.0 Conclusions

- 7.1 This Statement has been prepared to accompany an application submitted to Wokingham Borough Council for full planning permission for alterations to the existing roof to form two 2-bedroom apartments at second floor level, with sub-division of two existing two-bedroom first floor apartments to form four 1-bedroom apartments together with associated works including parking and cycle storage provision following the demolition of existing outbuildings all at 18-32 London Road, Twyford, Berkshire.
- 7.2 The Statement demonstrates that the Council are currently only able to demonstrate a circa 3.2-year supply of housing land and that, in accordance with the terms of the Framework, the 'tilted' planning balance (as set out in paragraph 11(d) of the Framework) is therefore engaged and sets a presumption in favour of granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the scheme.
- 7.3 In the context of the highly material and significant planning history of the site, including the terms of the extant planning permission, the Statement details:
- That the principle of the proposed development is acceptable, and would make effective and efficient use of land in a highly sustainable location;
 - That the proposals would preserve the significance of designated heritage assets, including the character and appearance of this part of the Twyford Conservation Area and the setting of a number of listed buildings³;
 - That there would be no adverse impact on neighbouring residential amenity;
 - That an appropriate and high-quality living environment would be created for future occupiers of the development;
 - That there are no landscape constraints or limitations to the proposed development;
 - That the proposals are acceptable in terms of matters of highways, access and parking;

³ And that, even if that were not the case and less than substantial harm was identified (as was the conclusion of the Council previously) the range of planning benefits delivered by the scheme would outweigh that harm (recognising the terms of the extant planning permission).

- That the proposals are compliant with flood risk policy; and
 - There are no ecological or biodiversity constraints or limitations to the proposed development.
- 7.4 Accordingly, it is concluded that planning permission should be granted for the proposed development.

DOCUMENT 1

NOTES:
1. All dimensions are in meters unless otherwise stated.
2. All dimensions are to the centerline of the road.



REV C: NOTED, ADDED 16.11.2022
REV C: CAR PARKING UPDATED 15.11.2022
REV B: SCALE ADDED 13.09.2022
REV A: RED LINE ADDED, SCHEDULE ADDED 08.09.2022

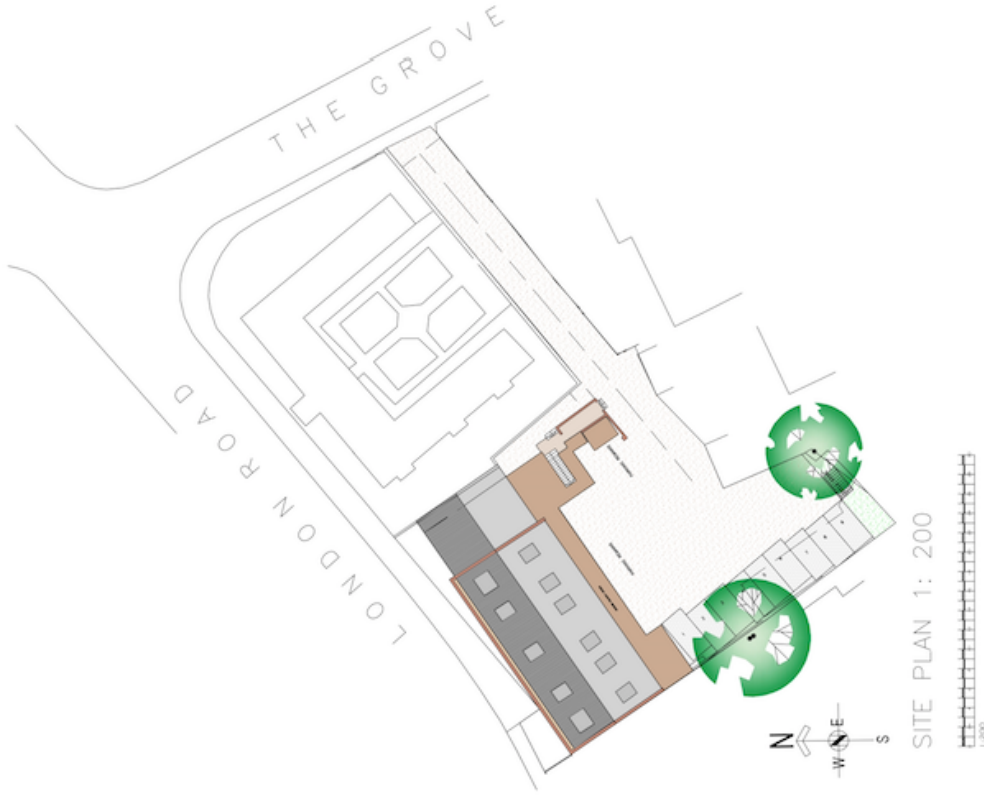
PROPOSED FIRST FLOOR
VERTICAL EXTENSION
18-32 LONDON ROAD
TWYFORD, BERKS, RG10 1ER
PREMIER GROUND RENTS NO 5 LTD
SITE PLAN AND LOCATION PLAN

SCALE 1:1250, 1:200 DATE 06.08.2022

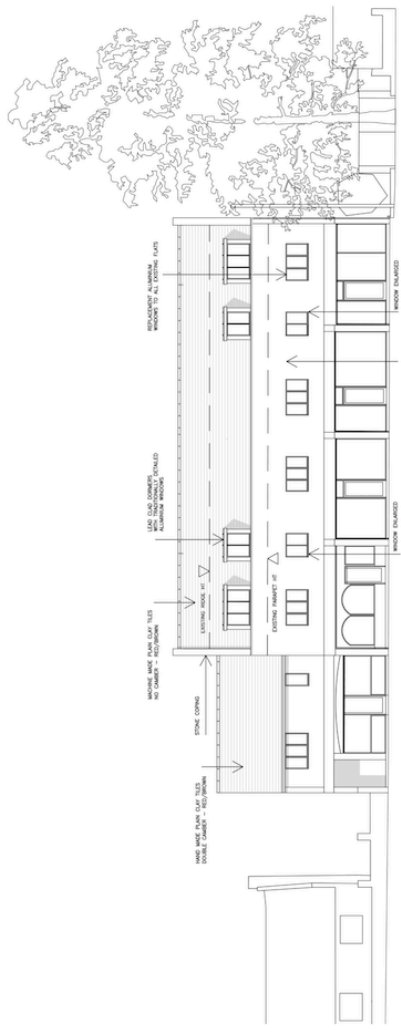


1. All dimensions are in meters unless otherwise stated.
2. All dimensions are to the centerline of the road.

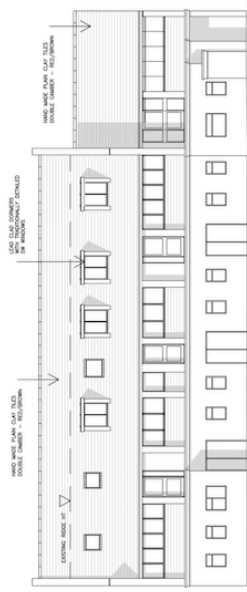
PROJECT 2001 DWG 01 D



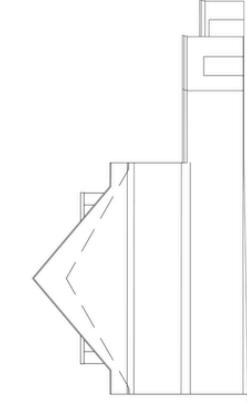
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1. All dimensions are in millimetres unless otherwise stated.
2. All dimensions are to the face of the work unless otherwise stated.
3. All dimensions are to the centre of the work unless otherwise stated.



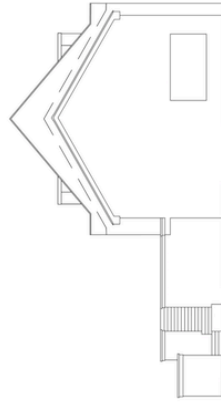
PROPOSED FRONT ELEVATION



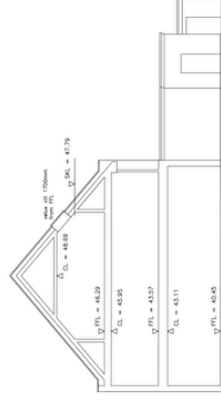
PROPOSED REAR ELEVATION



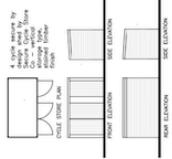
PROPOSED SIDE ELEVATION



PROPOSED SIDE ELEVATION



TYPICAL PROPOSED SECTION



REV D ELEVATION ALTERED AND PARAPET
REV C Windows added 19.01.23
REV B Windows added 19.01.23
REV A NOTES ADDED 16.11.22

PROPOSED FIRST FLOOR
VERTICAL EXTENSION
18-32 LONDON ROAD
Twyford, Berks, RG10 9ER

PREMIER GROUND RENTS No 5 LTD
PROPOSED ELEVATIONS AND SECTION

SCALE 1:100 DATE 05.08.2022



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PROJECT 2001 DWG 03.D