

# STATEMENT OF CONSULTATION ON THE DRAFT DESIGN GUIDE FOR HOUSE EXTENSIONS SUPPLEMENTARY PLANNING DOCUMENT

March 2021

## 1. Summary of Consultation Measures

- 1.1 Consultation took place from 31<sup>st</sup> July to 25<sup>th</sup> September 2020. The consultation period was eight weeks, extended from the statutory six week period to take account of the fact that it partially took place within the school holidays, in accordance with the Council's adopted Statement of Community Involvement (SCI).
- 1.2 Consultation involved contacting all those on the Council's planning policy consultation list, which includes a mix of statutory consultees, businesses, voluntary and community organisations and interested individuals, around 1,200 contacts in total. In addition, all planning agents that had submitted a householder planning application within the previous two years were notified of the consultation.
- 1.3 The document was also published on the Council's website. The consultation took place while social distancing measures were in place in response to the Covid-19 pandemic, which meant that public buildings such as the Civic Offices and public libraries were closed. This meant that the Council was not able to place hard copies in this location, as would generally be expected under the SCI. This was unavoidable, but is not considered to have had a significant effect on the consultation.

## 2. Summary of Responses

- 2.1 Responses were received from ten individuals or organisations, although three of these were merely to confirm that there were no comments. A total of 47 individual points were made by these respondents.
- 2.2 The following points were raised by respondents:
  - There are a number of parts of the document where it should be clearer on the instances where planning permission is not required as a result of permitted development rights.
  - More reference to heritage assets, in particular listed and locally-listed buildings, are required.

- Guidance should be given on hardstanding in front gardens.
- The document should be stronger on the measures to prevent residential annexes becoming separate dwellings.
- There should be stricter expectations in terms of energy performance of developments.
- More guidance should be given on the routes for permitted development, in particular the use of Lawful Development Certificates.
- A number of inconsistencies in the layout were highlighted.

2.3 Detailed summaries of each individual representation, as well as a response from the Council are included in Appendix 1. These are set out in document order.

## APPENDIX 1: SUMMARY OF REPRESENTATIONS AND COUNCIL RESPONSES

The table below includes summaries of the representations received to the consultation, listed in document order. Please be aware that these are not necessarily verbatim comments, rather they are summarised for ease of reference.

*Table 1: Summary of representations received and Council responses*

| Name             | Document ref    | Representation  | Council Response   |
|------------------|-----------------|---|--|
| Dhindsa, Baljit  | General comment | This document is great.   | Noted. No change needed.   |
| Dhindsa, Baljit  | General comment | I sometimes feel that there are many agents or even applicants out there who do not spend time in drawing up existing information correctly or accurately. This is probably due to saving time or quoting quite low. If yourselves as planners carefully check the accuracy of information, then it cannot be distorted later on either in further drawing work or when being built on-site.  | Noted. No change needed. Checking the accuracy of submitted plans is a part of validation and consideration process.   |
| Highways England | General comment | We have reviewed this consultation and its supporting documentation and have no comments.   | Noted. No change needed.   |
| Historic England | General comment | We do not wish to make any representations.   | Noted. No change needed.   |
| Natural England  | General comment | Biodiversity enhancement: This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit. | Noted. No change needed. The SPD does include some general guidance on how biodiversity can be incorporated within paragraph 6.3.1. However, requirements need to be proportionate to the type of development, which in this case is house extensions, outbuildings etc. |

| Name   | Document ref    | Representation  | Council Response  |
|--|-----------------|---|---|
| Natural England                              | General comment | Landscape enhancement: The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. | Noted. No change needed. The SPD does include guidance on the natural environment, in particular how proposals can contribute to the green network. However, landscape and townscape assessments are not likely to be generally required for householder applications, which is what this SPD deals with.   |
| Natural England                              | General comment | Protected species: Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.   | Noted. No change needed. This will be of use to the Council, but does not require a reference in the SPD.   |
| Natural England                              | General comment | Strategic Environmental Assessment/Habitats Regulations Assessment: A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.   | Noted. No change needed. This document expands on the House Extensions policy in the Local Plan. That policy was subject to Sustainability Appraisal (incorporating the SEA requirements and the coping-level Habitat Regulations Assessment requirements) as part of the Local Plan. Based on the results of that assessment, there is not considered to be a need to undertake a Sustainability Appraisal or HRA of this SPD. |
| Reading Conservation Area Advisory Committee | General comment | A sentence or two on actions that will be taken if this SPD and planning policy in general is not followed would be appropriate. There is a danger that the general reader will not read this document in the context of other policies and remain unaware of their responsibilities.   | Agreed. Change proposed. An additional sentence can be added to paragraph 2.0.3 to highlight that applications that do not comply with policy may be refused.   |

| Name   | Document ref    | Representation  | Council Response   |
|--|-----------------|---|--|
| Reading Conservation Area Advisory Committee | General comment | In respect of the HOUSE EXTENSIONS draft, is whether it is worth including some general advice on front gardens? Reading has suffered from poor conversions of front gardens to parking areas and bin storage areas in many locations. Whilst this is a pretty intractable problem, some guidance may assist. We attach for info an Oxford city guidance sheet in this respect. Whilst a pictorial guidance sheet has some disadvantages, written guidance incorporated into your guide may help. | Agreed. Change proposed. Some guidance should be added. However, permission for paving a front garden is rarely required, and the guidance needs to reflect that.  |
| Transport for London                         | General comment | I can confirm that we have no comments to make on the draft design guide  | Noted. No change needed.   |
| Wilkins, John                                | General comment | While recognising that it is a guide it should be helpful in ensuring that certain types of extension do not gain planning permission. Presumably RBC officials will compare any applications with the guide and highlight areas of non-compliance which would result in the application being rejected.  | No change proposed. The SPD will be used alongside the Local Plan policy to determine planning applications, and it is therefore expected that proposals will comply with the guide.   |
| Hughes, Steven                               | Contents        | Contents table - Text style is vertical align (V align) top, rather than vertical align center, resulting in the tops of numbers being cut off which looks odd.   | Agreed. Change proposed to amend this.   |
| Hughes, Steven                               | Contents        | Contents table - Numerals are in bold text matching the section text for some records but are not in bold text where the section text is bold for other records; this is inconsistent.  | Agreed. Change proposed to amend this.   |
| Hughes, Steven                               | Contents        | Contents table - hyperlinks on page number (as per glossary items) will aid users of this document.   | Agreed. Change proposed to add hyperlinks.   |
| Reading Conservation Area Advisory Committee | Paragraph 1.0.2 | A mention of Article 4 directions with a link would be appropriate in the introduction at para 1.0.2 and possibly 6.4.2 (materials).  | Partially agreed. Change proposed. A mention of Article 4 directions in 1.0.2 is not proposed, because this paragraph refers to the assessment of applications, rather than whether an application is required. A reference makes more sense in section 3. |
| Hughes, Steven                               | Paragraph 1.0.4 | Jargon use without definition - SPD (Supplementary Planning Document) acronym is throughout but not defined in glossary, nor written in its full form anywhere.   | Agreed. Change proposed to 1.04 and the Glossary.  |

| Name   | Document ref    | Representation   | Council Response  |
|--|-----------------|--|---|
| Hughes, Steven                               | Section 2.0     | Secondary headings treated inconsistently. Secondary heading “Conservation areas and listed buildings” on page 4 is not numbered and does not appear in the contents; whereas, secondary heading “6.1 Impact on existing dwelling” on page 5 is numbered and does appear in the contents.  | Agreed. Change proposed to remove the heading.  |
| Reading Conservation Area Advisory Committee | Paragraph 2.05  | Although the heading to this paragraph references conservation areas and listed buildings, specific reference to listed buildings and their setting should be added to the wording below to alert the general reader to their importance. Listed buildings should include ‘locally listed buildings’. The potential for designation of Local Areas of Special Character in the future should also be mentioned.                  | Partially agreed. Change proposed to make this section refer to listed and locally-listed buildings. At this point, Local Areas of Special Character have no planning policy status.  |
| Jhheent, Suki                                | Section 3.0     | No mention is made of a Certificate of Lawful Development, surely any permitted development work should be undertaken with this application ?  | Agreed. Change proposed. Section 3 should mention the Lawful Development Certificate application route.   |
| Hughes, Steven                               | Paragraph 5.0.1 | Daylight indicators are mentioned as a requirement on block plans but no detail on the form of the indicators is given, nor a definition of the “daylight indicator” in the glossary. If this is a requirement, then you should define what is expected.   | Agreed. Change proposed. This is no longer a validation requirement. This section should be redrafted to accord with the current validation requirements.   |
| Jhheent, Suki                                | Paragraph 5.0.1 | Site survey with levels will add to the applicants costs ? possibly as much as £1500.00 onwards (site dependent)   | Agreed. Change proposed. This is no longer a validation requirement. This section should be redrafted to accord with the current validation requirements.   |
| Hughes, Steven                               | Paragraph 5.0.1 | “Think about your neighbours!” - the exclamation is condescending, implying householders do not think about their neighbors. Many applicants clearly do think about their neighbors, and this statement is showing unconscious bias; planners no doubt remember applicants who do not take regard of their neighbors quiet enjoyment of their property more clearly. Government guidance should be non judgemental and unbiased. | Change proposed. It is of course true that many applicants have thought about the impact on their neighbours, but this is not always the case. Many issues at application, or post-permission stage, could be avoided by dialogue between neighbours at the outset. There is nothing judgmental in asking applicants to think about their neighbours. However, the wording can be slightly amended. |

| Name           | Document ref    | Representation  | Council Response  |
|----------------|-----------------|---|---|
| Hughes, Steven | Paragraph 6.1.2 | “...outdoor space no less than the Gross Floor Area (GFA) of the dwelling” - This statement seems highly likely to be factually incorrect guidance. Do you mean “outdoor space no less than the footprint of the dwelling”. There are numerous definitions of Gross Floor Area (GFA) but all include internal floor area on all floors. The majority of Reading housing stock has a higher GFA than rear garden area and extensions are still approved. | No change proposed. This refers to GFA, not to footprint. This overall guidance is also part of the adopted Local Plan (see paragraph 4.4.87). This paragraph does not present this guidance as a hard and fast rule, and it goes on to state that where the GFA is already greater than the outdoor space this will be considered on a case by case basis. However, there are some discrepancies with the Local Plan references to useable outdoor space, and these need to be resolved. |
| Hughes, Steven | Paragraph 6.1.2 | Gross Floor Area (GFA) - is used but not defined. There are multiple definitions of Gross Floor Area (GFA), so it is important to understand which applies in this document.  | Agreed. Change proposed. This should refer to Gross Internal Area, with this defined in the Glossary.   |
| Wilkins, John  | Section 6.3     | I hope that “suggested” tree planting can be made mandatory through the planning process.   | No change proposed. Policy EN14 of the Local Plan sets out the requirements for new development in terms of tree planting. It is clearly not reasonable to require new tree planting for all house extensions.  |
| Hughes, Steven | Section 6.3.1   | Page 6 - Incorrect use of semicolon - “At the scale of householder planning applications; development should not result in a loss of biodiversity ...” should be “At the scale of householder planning applications development should not result in a loss of biodiversity ...”  | Agreed. Change proposed.  |
| Hughes, Steven | Section 6.3.1   | Page 6 - Incorrect use of proper nouns - “particularly within an urban Borough” should be “particularly within an urban borough” (if you are referring to any old bourgh it is not a proper noun and should not be capitalised; if you are referring to a particular bourgh eg. Reading Borough Council then it should be capitalised)  | Agreed. Change proposed.  |
| Cowling, Dr AP | Paragraph 6.4.1 | It is my opinion that the council should no longer accept double glazed windows and that all new work, both new build, renovation and extensions should be required to use 3g (triple glazed) windows and doors. Reason to reduce energy demand (windows lose a lot of heat)  | No change proposed. This would introduce a policy requirement that does not exist in the Local Plan, and an SPD does not have the ability to make such a policy change.   |

| Name   | Document ref    | Representation  | Council Response   |
|--|-----------------|---|--|
| Cowling, Dr AP                               | Paragraph 6.4.2 | Something should be included in this section about the required thermal properties of building elements other than windows. i.e. maximum allowable U values for walls, floors and ceilings/roofs NEED TO BE THOUGHT ABOUT AT THE DESIGN STAGE. In Wokingham we should be building to a robust low energy standard that is far better than the requirements of current building regulations.   | No change proposed. This would introduce a policy requirement that does not exist in the Local Plan, and an SPD does not have the ability to make such a policy change.  |
| Reading Conservation Area Advisory Committee | Paragraph 6.4.3 | <p>We would like to comment in particular in respect of the cross references to Conservation Areas. As you will recall, the Action Plans for the two completed CA appraisals, St Peters and Castle Hill/Russell Street/ Oxford Road allow for the creation of a general Guidance Document which would apply Borough wide to all Conservation Areas.</p> <p>We have now started work on this document and believe that this future document will need to be somehow clearly and closely cross referenced in your draft guide to house extensions. We would hope that a suitable form of words can be found in your para 6.4.3 to allow such a reference.</p> <p>This is also an appropriate time for us to liaise with RBC on the Content of this CAAC generated general guidance document and we look forward to any comments you may have.</p> | Partially agreed. Change proposed. Further cross-references to the enhancement priorities in the appraisals can be made, as well as to potential future guidance. However, this cannot be specific to any particular document before it has been produced.   |
| Reading Conservation Area Advisory Committee | Paragraph 6.4.3 | As in para 2.0.5 a reference to listed buildings and their setting and the potential for LASCs would be helpful.  | Partially agreed. Change proposed. Reference can be made to listed buildings and locally-listed buildings and their settings. Local Areas of Special Character is not a reference that appears in any other policy document and has any current policy status or any definition. A reference in this document would serve only to confuse. |
| Jhheent, Suki                                | Section 7.1     | All references to example planning applications cite application reference numbers, surely this is contrary to GDPR and exposure of applicant details and is also free advertising for the agents ?   | No change proposed. This data is all already publicly available.   |
| Wilkins, John                                | Paragraph 7.1.2 | Which property is the example in the picture, the one in the middle?  | The application reference is above the photo, and all information is on the Council's website.   |



| Name           | Document ref    | Representation   | Council Response  |
|----------------|-----------------|--|---|
| Jhheent, Suki  | Paragraph 7.2.1 | Side extension upper floors should be away from the side boundary (?) this is impractical for buildability without escalating costs for the applicant and is not sustainable. The frontage set-back will alone reduce the proposed ridge height.   | No change proposed. This is key to avoiding a terracing effect, as discussed elsewhere in the SPD.  |
| Cowling, Dr AP | Section 7.3     | Dormer windows should only be allowed where the insulation value of the cheeks and roof have an overall U value of less than 0.1 W/m <sup>2</sup> K  | No change proposed. This would introduce a policy requirement that does not exist in the Local Plan, and an SPD does not have the ability to make such a policy change.   |
| Hughes, Steven | Section 7.3     | Image showing three terrace houses and two dormers - "Unacceptable solutions" - This image is ambiguous and the text in plural is incorrect. The box dormer to the rear of the terrace (middle house) is permitted development in England and outside the scope of local planning departments' jurisdiction (non-conservation area etc not withstanding). The image is ambiguous as two dormers are shown - one permitted development, one not permitted and not in line with local guidance. The text "Unacceptable solutions" in plural is factually incorrect as at least one of these box dormers is permitted development.  | Agreed. Change proposed. The image should be altered to show an alternative front dormer. There are caveats to rear dormers being permitted development e.g. relating to materials and setting back from eaves, but this will be difficult to represent on the diagram. |
| Hughes, Steven | Section 7.3     | Page 13 - Dormer extensions - omission - It is highly relevant and appropriate to state that rear box dormer extensions are permitted development at a national level. This is important information which is clearly relevant and should be stated; otherwise householders will be disinclined to trust the accuracy of this document, assume it is not presenting honest and full guidance with their best interests at heart, and seek information from alternative sources which present a more open description of the facts. For an excellent example, see Section 7.5.2 "Building in the garden", which clearly states the relevant permitted development rules in this area. | Agreed. Change proposed. The text should be amended to more clearly outline permitted development rights.   |
| Jhheent, Suki  | Section 7.3     | Greater emphasis should be made on not building to the boundary edges of the roof, as this will not allow maintenance of the roof and promote party wall issues - trespassing over neighbouring properties (reference to party wall 1996 required - section 8.0.6 and professional advice from Party Wall Surveyors)   | Agreed. Change proposed. This should be referenced in the section on dormer windows.  |

| Name          | Document ref    | Representation  | Council Response  |
|---------------|-----------------|---|---|
| Wilkins, John | Section 7.5     | <p>A close neighbour recently secured permission for a building in the garden. This type of development is becoming more common and needs better controls. In some towns such developments have resulted in what look like “shanty towns”, which is unacceptable. In general many such developments occupy too much of the existing garden and 50% is too high a proportion to be occupied. Should there be “limit” on the size of the garden building compared with the main property? Such developments could be on two floors (or more) and in my view should be restricted to one floor. The guidance says that “ancillary accommodation is....largely acceptable”.</p> <p>I have major concerns that what is said to be ancillary accommodation later becomes a separate residence. I have an example where I asked the planning officer why a planning condition could not be placed defining the use as ancillary (e.g. garage/workshop) and making it clear that any change of use required new planning permission. I was told that this would be “unreasonable”, but in my view it was just confirming what the applicant had said in the original application! Even if kitchen/bathroom are not in the original plans they can easily be added through largely internal works. I also saw an example of where what was said to be garage had patio doors at the rear making it very easy to convert into living accommodation! Can the guidance highlight concerns on this type of approach? Once something has permission and is built it is very difficult to apply new controls if there is what might be called “creeping development”. Please can this section be reviewed to try and increase the controls on such developments?</p> | <p>No change proposed. The SPD does include general guidance on outbuildings. Permitted development rights allow for outbuildings to cover up to 50% of the garden (subject to other size parameters) and the SPD cannot override this. The acceptability of outbuildings will vary on a case by case basis, and applying hard and fast limits is unlikely to be justifiable.</p> <p>In terms of ancillary accommodation, the Local Plan already highlights the need to apply controls to ensure that this cannot be established as a separate dwelling, either through planning conditions or Section 106 agreement. The SPD should include reference to this text, and include this as a separate section (as ancillary accommodation will not necessarily always be outbuildings, but could take the form of extensions to the main dwelling).</p> |
| Jhheent, Suki | Paragraph 7.5.2 | Permitted development should make reference to Certificate of Lawful development applications.  | No change proposed. This is now included when permitted development in general is discussed in section 3. It is not considered necessary to refer to Lawful Development Certificates in relation to every mention of permitted development.   |

| Name   | Document ref    | Representation  | Council Response  |
|--|-----------------|---|---|
| Cowling, Dr AP                               | Paragraph 8.0.5 | Something should be included in this section about the required thermal properties of building elements other than windows. i.e. maximum allowable U values for walls, floors and ceilings/roofs NEED TO BE THOUGHT ABOUT AT THE DESIGN STAGE. In Wokingham we should be building to a robust low energy standard that is far better than the requirements of current building regulations. | No change proposed. This would introduce a policy requirement that does not exist in the Local Plan, and an SPD does not have the ability to make such a policy change. |
| Jhheent, Suki                                | Paragraph 8.0.6 | Applicants should be referred to the Party Wall Act 1996 in your section 8.0.6 where boundary conditions are mentioned.   | No change proposed. This paragraph already refers to the Party Wall Act 1996.   |
| Jhheent, Suki                                | Section 9.0     | Clarify the 45 degree rule for two storey and 60 degree for single storey.  | Agreed. Change proposed. The Glossary should make clear that 45 degree relates to two storey proposals and should add the 60 degree rule for single storey.             |
| Hughes, Steven                               | Section 9.0     | The definition of daylight is incorrect - volume is not a unit of light.  | Agreed. Change proposed to refer to 'amount'.   |
| Hughes, Steven                               | Section 9.0     | Incorrect use of proper nouns - "planning policies for a District or Borough" should be "planning policies for a district or borough"; neither are proper nouns in this sentence.   | Agreed. Change proposed.  |
| Reading Conservation Area Advisory Committee | Section 10.0    | We tried a few of these links and they did not work. They probably need updating for the new Reading Borough Council website.   | Change proposed. The website was refreshed during the consultation, and this resulted in some of the links being lost. These will be updated in the final version.      |