

DELEGATED APPLICATION REPORT

Application No.230061

Address: 29 Castle Street, Reading

Proposal: Change of use from offices to residential

Case officer: Ethne Humphreys

Target Date: Originally 2/8/2023 EOT until 21/12/2023

Site Description and Surrounding Area

The application site relates to No.29 Castle Street, located on the south side of Castle Street.

The site is located within the St Mary's Butts/Castle Street Conservation Area. The site is also within an Air Quality Management Area and an area of potential archaeological significance. The site is located within Reading Central Core Area.

This part of Castle Street primarily consists of businesses at ground floor level and residential/offices at the upper floors.

Proposal

The application seeks full planning permission for the proposed conversion of office accommodation to create 1 x 1 bed unit and 3 x 2 bed units.

No external alterations to the building are proposed.

Location and Block Plan CA11

Received 18th January 2023

First and Second Floor Plans Proposed CA9B

Proposed Elevations CA10A

Received 25th September 2023

Lower and Ground Floor Plans Proposed CA8B

Received 30th October 2023

Relevant Planning History:

None relevant.

Public Consultation:

Notification letters were sent to nearby properties, a site notice was displayed, and a press notice published. No neighbour letters of representation have been received.

Consultation Responses:

Transport: Further to revised plans and additional information, no objection, subject to conditions. Discussed further below.

Environmental Protection: No objection, subject to conditions. Discussed further below.

Ecology: No objection, discussed further below.

Berkshire Archaeologist: No objection, subject to conditions. Discussed further below.

Conservation Area Advisory Committee: No comments received.

Equality Act 2010:

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

Relevant Planning Policy and Guidance

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

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) - among them the 'presumption in favour of sustainable development', which means 'approving development proposals that accord with an up-to-date development plan without delay' (NPPF paragraph 11).

The following local and national planning policy and guidance is relevant to this application:

National Planning Policy Framework (2023)

The following NPPF chapters are the most relevant (others apply to a lesser extent):

- 2. Achieving sustainable development
- 4. Decision-making
- 5. Delivering a sufficient supply of homes
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment
- 6. Conserving and enhancing the historic environment

National Planning Policy Guidance (2014 onwards)

Reading Borough Local Plan 2019

- CC1 Presumption in favour of sustainable development
- CC2 Sustainable design and construction
- CC3 Adaptation to climate change
- CC5 Waste minimisation and storage
- CC6 Accessibility and the integrity of development
- CC7 Design and the public realm
- EN1 Protection and enhancement of the historic environment
- EN2 Areas of archaeological significance

EN3	Enhancement of conservation areas
EN6	New development in a historic context
EN14	Trees, hedges and woodlands
EN15	Air quality
EN16	Pollution and Water Resources
EM3	Loss of Employment Land
H1	Provision of housing
H2	Density and mix
H3	Affordable housing
H8	Residential Conversions
TR1	Achieving the transport strategy
TR3	Access, traffic and highway related matters
TR5	Car and cycle parking and electric vehicle charging
RL1	Network and Hierarchy of Centres
CR6	Living in central Reading

Supplementary Planning Documents

Affordable Housing SPD (2021)

Revised Parking Standards and Design SPD (2011)

Revised SPD on Planning Obligations under Section 106 (2019)

Sustainable Design and Construction SPD (2019) Reading Tree Strategy (2021)

Residential Conversions SPD (2023)

Other relevant documentation/guidance/legislation

St Mary's Butts/Castle Street Conservation Area Appraisal 2008

Historic England Good Practice Advice in Planning Note 1: Conservation Area Designation, Appraisal and Management (Historic England, 2016)

Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015b)

Principles of Conservation (Historic England, 2008)

Guide to the Conservation of Historic Buildings (British Standards Publication BS 7913:2013, 2015)

National Design Guide: Planning practice for beautiful, enduring and successful places (2019)

Land Use Considerations

The NPPF states that LPAs should “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”.

The proposals seek to provide four residential units by way of conversion. The site is on previously developed land within the urban area and is therefore considered suitable for residential development in principle, subject to any other relevant policies relating to the existing or proposed uses.

Prior to considering the proposed use, consideration of the loss of the existing uses must first be provided. In this respect, it is considered that Policy EM3 (Loss of Employment Land) is relevant to the proposal. The site is located outside of the office core and is not located within a Core Employment Area and, therefore, a loss of employment (in this case office) use would be appropriate, subject to consideration of the criteria set out in this policy.

The applicant considers that there is limited demand for this office space, in part also due to the availability of more suitable office accommodation elsewhere in the town, where new mixed-use developments have generated high quality office accommodation.

In this respect, it is noted that there is a relatively high level of properties in residential use in the surrounding area. It is also noted that the external character of the application property appears more residential in nature than anything else and it is likely that the property was originally in residential use.

It is recognised at both national and local level that the introduction of residential accommodation within centres serves to enhance the vitality and viability of those areas as well as being an important source of delivering affordable housing in sustainable locations. It is also supported by Policy RL1 which notes that 'residential use of upper floors' would be acceptable in all centres. As above, it is noted that there has been other conversion from office to residential along this part of Castle Street, and this part of the terrace in particular.

Given the loss of the existing use is considered acceptable, it is considered that the principle of providing a residential use is acceptable, which aligns with the broad objectives of Policy H1 in assisting in meeting the annual housing targets. On the basis of the above, the proposed change of use is considered acceptable in principle, subject to other material considerations discussed below.

Unit Mix

Policy CR6 (Living in the Centre) seeks that the residential developments within the town centre provide a range of different sized units, ideally a mix of 1, 2- and 3-bedroom units. Given the size of the proposals for four units only the proposed mix of 1 x 1 bed and 3 x 2 bedroom units is considered acceptable.

Design and Heritage Considerations

Policies CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character and Policy CR2 (Design in Central Reading) seeks to acceptable relationships between buildings in the town centre are created. Policy EN1 (Protection and Enhancement of the Historic Environment) states that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced and Policy EN3 (Enhancement of Conservation Areas) states that the special interest, character and architecture of Conservation Areas will be conserved and enhanced and that development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness.

The proposals originally included a fourth floor rear flat roof extension. The proposed extension was not considered to be an enhancement due to its scale, bulk and lack of

detail/articulation. Whilst not visible from Castle Street, the extension would have been highly visible from the rear public domain, adjacent several listed buildings and within the St Marys Butts/Castle Street Conservation Area, forming part of a strong heritage context. The agent was advised that the extension was not considered to make a positive contribution to the building and wider and further to this, this element was subsequently omitted from the scheme.

Further to the above, no external alterations are now proposed and, as such, the proposals are not considered to result in any adverse effect on either the host building or the visual amenities of the street scene and wider Conservation Area.

Impact on Neighbours

Policy CC8 (Safeguarding Amenity) 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. Policy CR6 (Living in Central Area) seeks to safeguard neighbour amenity from potential noise disturbance.

The use of the site for 4 residential units is not considered to result in any general harm or disturbance to the surrounding area where residential uses are common.

Further to the omission of the fourth floor extension, it is not proposed to enlarge the property such that no undue loss of light or overbearing impact would occur. The proposals originally included a fourth floor terrace area which was considered to result in unacceptable noise/disturbance levels and overlooking. This has now been omitted from the scheme and no such concerns are now considered to arise.

No new windows are proposed and as such there would be no material loss of privacy.

Given the lack of external amenity space, no harmful noise/dust/disturbance impacts are considered to arise. The proposed flats are not considered to harm the living conditions to neighbouring properties or the surrounding area.

Amenity of future occupiers

Policy CC8 (Safeguarding Amenity) seeks to ensure that both the amenity of neighbouring properties and the amenity of future occupiers is adequately protected. Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.

The internal layout as originally submitted was considered to result in poor quality of accommodation for future occupiers. Not all bedrooms would have had outlook and concerns were raised as to whether there would be sufficient daylight (noting no daylight/sunlight report). Further to concerns raised, the layout was revised such that all rooms are now considered to be provided with suitable levels of outlook and daylight. The room sizes

proposed are considered reasonable, albeit irregular in shape, and to provide a suitable level of residential accommodation for future occupiers.

As is the case with the majority of town centre dwellings, meaningful amenity space is not capable of being provided on site. Given the location of the site and access to nearby public amenities it is considered that in this instance the lack of amenity space is acceptable and is not considered to unduly compromise the overall quality of accommodation proposed such to warrant a refusal on this basis.

In terms of noise and disturbance, RBC Environmental Protection officers have raised no objection subject to a pre-commencement condition to require a noise assessment. This is required owing to the busy nature of Castle Street, coupled with commercial premises in the vicinity that may cause noise disturbance. Therefore, in overall terms the units are considered to provide an overall suitable standard of accommodation.

Transport Matters

Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.

The site is located within the Reading Central Area and within Reading's primary shopping area which is an area at the very heart of Reading Borough, consisting primarily of retail and commercial office developments and in close proximity to Reading rail station. This area is well served by rail and bus links and also contains the largest proportion of public car parking spaces. Loading bays are located near the site which are used to service the retail/residential units on Castle Street. In addition to this, there are shared users pay and display bays adjacent to the site.

In accordance with the Councils current parking standards each 2 bedroom unit would require 1 parking space each. There is a car park at the rear. Submitted lower and ground floor plan illustrates 4 parking spaces. The size of the bays for not conform to the length required as stated in the Council's Parking SPD.

Given that the existing use was provided with 6 parking spaces in an informal parking layout, the provision of 4 formalised parking spaces would be an improvement albeit not fully to standard. Notwithstanding this, during the course of the application adjustments were made to the sizes of the parking spaces which the Council's Transport Officer has confirmed is acceptable.

Policy TR5 relates to car parking, cycle parking and electric charging points and states that residential developments of at least 10 spaces should provide an active charging point. Whilst this development falls below the threshold, the applicant has stated 2 EV charging points will be provided.

The surrounding road network has extensive parking restrictions preventing unauthorised on-street parking. It should be noted that future occupants of the proposed units, would not be

eligible to apply for resident or visitor parking permits and this will be covered via the appropriate conditions and informatives.

The proposal illustrates an acceptable level of cycle parking provision in a covered and secure cycle store. Bin storage is acceptable and the Council's waste collection team have confirmed that refuse collection arrangements are acceptable.

Natural Environment

Policy EN14 (Trees, Hedges & Woodland) seeks to extend the Borough's vegetation cover and that development should make provision for tree planting, whilst Policy CC7 (Design and the Public Realm) seeks proposal should include appropriate landscaping. Policy EN12 (Biodiversity & The Green Network) seeks that developments should retain, protect and incorporate features of biodiversity.

There are no trees within or close to the application site. Due to the relatively constrained nature of the site, particularly to the front of the property together with the need to provide outlook and daylight to lightwells, it is accepted that there is limited scope for landscaping. It is noted that the existing building and others along this side of Castle Street are similar in urban character and without soft landscaping. However, the application does propose some limited new planting to the rear of the site which will be a welcome enhancement of the site. The proposal would not result in a net loss of biodiversity, and it is accepted that the provision of meaningful landscaping cannot appropriately be achieved.

The Council's Ecologist suggested a condition requiring details of biodiversity enhancements to include swift and bat boxes, tiles or bricks to be built into the walls of the originally proposed extension. The extension has now been omitted from the scheme.

Sustainability

Policy CC2 (Sustainable Design and Construction) requires new development to reduce the consumption of resources and materials and includes that *"All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'VERY GOOD' standards, as a minimum"* and that *"Conversions to residential should incorporate water conservation measures."*

It is acknowledged that the proposals, as largely a refurbishment proposal of an older, building and change of use of existing building, do not neatly align with the standard BREEAM requirements. As such, it is considered reasonable to allow a flexible approach in this respect and a condition is recommended to be attached to require either the BREEAM certificate to be provided or for an alternative sustainability assessment addressing the requirements of Policy CC2 to be submitted and approved in writing by the LPA.

Affordable Housing

Policy H3 (Affordable Housing) seeks to ensure that an appropriate affordable housing contribution is made for the delivery of new housing. This proposal seeks 4 new dwellings and therefore requires a financial contribution to be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.

In this instance the applicant has submitted a financial viability appraisal which states that this would not be financially viable. In the case of this particular application a significant amount of time has elapsed, and the Council's Valuer has not provided a counter argument to the submitted FVA. In these circumstances and given the relatively small scale of the proposal together with the lack of evidence to the contrary it is considered reasonable to allow the proposals to proceed without an AH contribution.

Archaeology

Policy EN2 (Areas of Archaeological Significance) requires that applications adequately assess and investigate sites of archaeological significance.

The Berkshire Archaeologist has confirmed that there are potential archaeological implications with the proposal, as demonstrated by Berkshire Archaeology's Historic Record. The site lies within Reading's historic town center and on the edge of the suggested extent of the original Early Medieval settlement centered on St Mary's Church to the north-east of the site. Excavations in the surrounding area and in the wider town centre have shown considerable archaeological survival.

Whilst the proposal predominantly involves changes to the internal structure of the building that will have little below ground impact, there are some elements that involve the positioning of services and landscaping to the rear of the property. These may involve some ground disturbance that might impact on potential buried archaeology.

As such, a condition requiring submission of a programme of archaeological work is recommended to mitigate the impacts of the proposal.

CIL

With regards the proposed scheme, development will be potentially liable for CIL if it involves the change of use to residential where floorspace has not been in use for 6 months of the previous 3 years on the day planning permission is granted. The standard CIL informative will be attached to the decision notice reminding the applicant of their duty in this respect.

RECOMMENDATION:

GRANT