

Planning & Design Statement

In support of a proposal for the change of use of 27-28, 29-31 and 32 Market Place at first, second and third floors to provide 8 residential units, retention of flexible Class E uses at ground and basement floors of 27 – 28 and 32 Market Place, retention of 260.4 sqm as a public house (Sui Generis use) at basement and ground floor of 29 – 31 Market Place with associated external works, landscaping, plant, cycle store, and substation.

27-32 Market Place: Demolition of 20th Century additions to the rear of 29-31 Market Place and 32 Market Place with associated internal and external alterations to listed buildings.”



**Site at Nos. 27-32 Inc Market Place
Reading
RG1 2DE**

March 2022

1.0 Introduction

- 1.1 This Planning & Design Statement has been prepared by Allen Planning Limited on behalf of our client to support a planning application and listed building consent on this site.
- 1.2 It is proposed to demolish the modern rear parts of 29-31 and 32 Market Place and also to change the use of the retained units at Nos. 27-28, 29-31 and 32 Market Place at first, second and third floors to provide 8 residential units.
- 1.3 At ground floor and basement level it is proposed to retain flexible Class E uses as set out within the UCO and also retain the public house (sui generis use) at the ground floor of Nos. 29-31 Market Place.
- 1.4 The proposed demolition of modern rear elements and internal alteration work to the Market Place buildings are also subject to a related application for listed building consent.
- 1.5 The eight residential units proposed to the upper floors of Nos. 27-32 Market Place are proposed as a mix of 4 x 1-bedroom units, 3 x 2-bedroom units and 1 x 3-bedroom unit.
- 1.6 **The proposals to the Market Place buildings sought through these applications are the same as those supported at Planning Committee under references 21/0163 and 21/0164 and previous to that those approved under references 180358FUL & listed building consent ref. 180359LBC.**
- 1.7 These previous applications also included the development of the neighbouring land in Friar Street which are not proposed as part of these new applications.
- 1.8 Given the current poor condition of the listed buildings the Applicant is keen to deal with this aspect of the overall site in isolation in order that firstly the necessary works to improve and repair the listed buildings can be successfully undertaken together with their viable use rather than their current vacant condition.
- 1.9 Given that the buildings on this site are listed therefore s66 of the Act requires:

(1) In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

(2) Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed
- 1.10 In overview of planning constraints and policies material to these applications in addition to those identified above the site lies within the boundary of the defined Reading Central Area: (see Policies CR1 to CR10 of the Reading Borough Local Plan 2019) and also:

- Within a designated primary frontage within the defined Central Area: Policy CR7

- Within the central core, primary shopping area and office core of the defined central area: Policy: CR1
- Within an area of archaeological potential: Policy EN2
- Within an Air Quality Management Area (AQMA): Policy EN15
- Partially within the Market Place/London Street Conservation Area (Policy EN3)
- Nos 27-32 Market Place Grade II Listed Buildings (Policy EN1)
- The Market Place frontage is also within the High Street Heritage Action Zone for Reading.

1.11 Given that these proposals “mirror” those of the previous extant consents/supported applications in terms of these buildings then these applications are also supported by:

- a detailed Heritage Impact Assessment undertaken by Turley Heritage
- a Noise Impact Assessment by Jostec

1.12 In overview these applications, seeking as they do to deal with the listed buildings in isolation from the buildings on Friar Street, propose no alterations whatsoever in terms of matters of land use, external appearance or internal alterations to those which have recently been “agreed” by the LPA as described in the planning history above.

2.0 Site Location

2.1 The application site is formed of three buildings on the western side of Market Place, Nos 27-32, fronting onto the wide footway and the Market Place itself. Part of the application site sits within the London Street/Market Place Conservation Area

2.2 No.27-28 Market Place is a Grade II listed, three storey (plus attic accommodation and basement) building the building is timber framed and dates from the seventeenth century and internally, the building is currently just one room deep. The building is vacant but was formally an A1 shop on the ground floor with ancillary storage at the upper floors.

2.3 No.29-31 Market Place was last used as a public house (Coopers Arms) and is also a Grade II listed which has three storeys plus accommodation in the roof space and also an extensive basement. The existing structure of the building dates largely from the seventeenth century, however the building has been extended to the rear (three storeys plus basement) in the 1950s/60s and an internal open courtyard roofed over.

2.4 The existing half-timbered Market Place façade was added in the early twentieth century (1930s), and the ground floor shop front is a more modern, mid-twentieth century addition. The building is currently vacant.

2.5 No.32 Market Place is a four-storey building, Grade II listed, constructed in the mid nineteenth century (1840-1853). The front façade survives largely intact with traditionally proportioned sash windows. The ground floor had been completely stripped out and a modern shop front is now in situ.

2.6 On the rear elevation of No.32 the original sash windows have been replaced with modern UPVC double glazed units and, also on the rear, there is a large flat roof, single storey extension. This building is also currently all vacant with all ground floor windows boarded up.

- 2.7 The site is set within the historic element of the overall town centre in close proximity to a number of listed buildings, including the Grade I St Laurence's Church
- 2.8 The general location of the site is shown in Figure 1 below

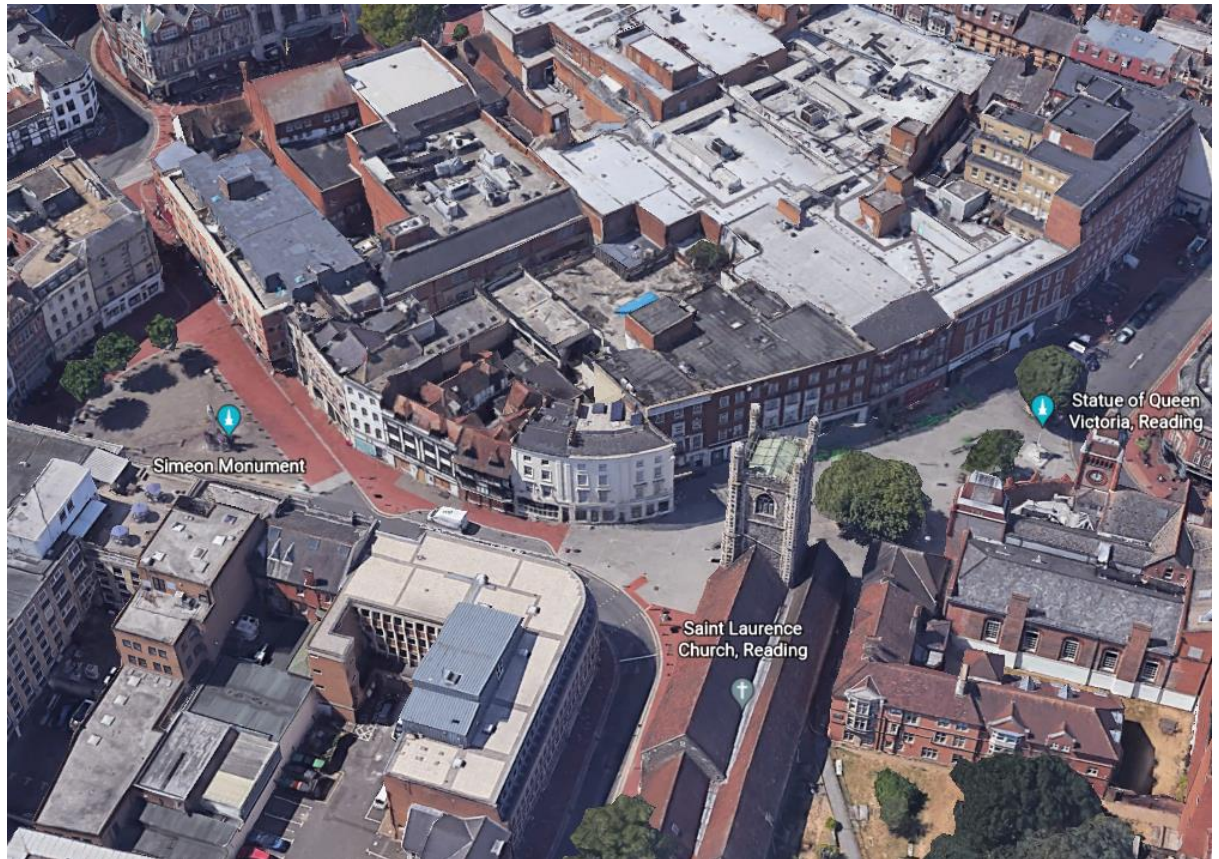


Figure 1 – Site location

3.0 Planning History

- 3.1 In terms of material planning history, this site together with its neighbour has a long and complex planning history and therefore we refer to the most recent applications on the site set out below.

210163FUL - Demolition of vacant former Bristol & West Arcade (173-175 Friar Street) and redevelopment of site including minor excavations at basement level to provide an 8- storey building to provide a hotel (C1 use) of up to 182 beds, creation of a bar/restaurant/gym at ground floor associated with the hotel and the provision of ancillary facilities including outdoor terrace, demolition of rear parts of 29-31 and 32 Market Place, the change of use of the retained units at 27-28, 29-31 and 32 Market Place at first, second and third floors to provide 8 residential units, retention of flexible Class E uses at ground and basement floors

210164LBC - Demolition of 20th Century additions to the rear of 29-31 Market Place and 32 Market Place with associated internal and external alterations to listed buildings

- 3.2 The above applications were recommended for approval by the planning officers to the Planning Committee, who endorsed those recommendations, subject to the completion of an appropriate legal agreement. Given that no formal planning decision has been released by the LPA it is assumed that the previous applicants have not completed that legal agreement.
- 3.3 Nonetheless these applications identify the LPA's acceptance of that proposed development subject to the completion of the legal agreement.
- 3.4 Prior to the above permissions were granted by the LPA as follows:
- 180358FUL & 180359LBC - Demolition of vacant former Bristol & West Arcade (173 – 175 Friar Street) and erection of an eight storey mixed –use building (plus basement) to provide 35 residential units, 4,208 sqm of B1 office floorspace, and 5 retail units (A1/A2/A3); demolition of rear parts of 29 – 31 and 32 Market Place the change of use of the retained units at 27 – 28, 29 - 31 Market Place at first, second and third floors to provide 8 residential units, change of use at ground and basement level of 32 Market Place from A2 to flexible retail use (A1/A2/A3), retention of 260.4 sqm of A4 use at ground and basement at 29-31 Market Place, change of use at ground and basement of 27 - 28 Market Place to flexible retail use (A1/A2/A3), and associated internal and external works to the Listed Buildings, landscaping, refuse, plant, cycle stores and substation at basement level (associated S106 legal agreement).*
- 3.5 On that basis this application, seeking as it does to deal with the listed buildings in isolation, proposes no alterations whatsoever in terms of matters of land use, external appearance or internal alterations to those which have recently been supported/approved by the LPA.
- 3.6 Whilst those most recent applications were for a larger development site (including properties in Friar Street) however given the current condition and lack of use of these highly sustainable listed buildings it is submitted that there would be no harm to deal with these buildings in isolation following previously accepted development principles.
- 3.7 Indeed it is submitted that significant benefits would result through much-needed works to the listed buildings themselves together with the return of viable land uses to these currently vacant buildings.

4.0 Planning Policy

- 4.1 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, the Development Plan is made up of the 2021 revised National Planning Policy Framework and the Reading Borough Council's Local Plan (November 2019).

Revised National Planning Policy Framework, 2021

- 4.2 Turning first to national guidance Paragraphs **8 -10** of the NPPF advise:

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

4.3 **Paragraph 11** identifies the fundamental thrust of the guidance which states that Plans and decisions should apply a presumption in favour of sustainable development which for decision taking means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷;
 - 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

Housing/Best use of land

4.4 Paragraph 69 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

4.5 In addition paragraph 119 adds that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land

4.6 Amongst other matters Paragraph 120 adds that Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

4.7 Finally, Paragraph 124 also adds that planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places

4.8 It is important at the outset of this Statement to identify that paragraph 120 of the NPPF identifies that planning policies and decisions should amongst other matters:

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers

Design

4.9 In terms of design paragraph 126 advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and

development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

4.10 Paragraph 130 adds that planning decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

4.11 Paragraph 134 notes that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵², taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings

Highways/Parking

4.12 Turning now to matters of car parking the revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 110 that: -

“110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;
 c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
 d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

4.13 Importantly Paragraph 111 of the Framework advises that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

4.14 In terms of the use of parking standards paragraph 108 of the recently revised NPPF advises:

108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

Key Policies of the Local Plan

4.15 **Policy RL1** (Network and Hierarchy of Centres) which seeks the vitality and viability of Reading as a Regional Centre to be maintained and enhanced. In addition, **Policy RL2** (Scale and Location of Retail, Leisure and Culture Development) states that the town centre shall be the focus for new investment.

4.16 The site along with the neighbouring buildings at the former Bristol and West Arcade and Nos 173-175 Friar Street are allocated for development within the Reading Borough Local Plan 2019 under **Policy CR14d**. This policy states that the development principles for the site are:

“Change of use of listed buildings and development of remainder for residential and/or offices with retail and related uses on the ground floor, retaining the arcade form and that development should:

- ☐ *Avoid detrimental effects on the significance of the listed building and the Conservation Area and their settings;*
- ☐ *Take account of potential archaeological significance;*
- ☐ *Address noise impacts on residential use; and*
- ☐ *Address air quality impacts on residential use.*

4.17 Provision of new Housing within the Borough is supported by **Policy H1** (Provision of Housing) which sets the housing provision target over the plan period.

4.18 **Policy EN1** (Protection and Enhancement of the Historic Environment) states that heritage assets, including their settings will be protected and where possible enhanced. The policy goes on to state that proposals should seek to avoid harm to heritage assets in the first instance but that any harm identified would require clear

and convincing justification, usually in the form of public benefits. The policy also states that in respect of listed buildings development proposals should not have an adverse impact on those elements which contribute to their special character or historical interest.

- 4.19 **Policy EN3** (Enhancement of Conservation Areas) seeks that the special interest and character of such areas is conserved and enhanced
- 4.20 In terms of general design approach, **Policies CC7** (Design and the Public Realm) **and CR2** (Design in Central Reading) seek that all development must be of high design quality that maintains and enhances the character and appearance of the area within which it is located.
- 4.21 In addition both **Policies CR2 and CR3** (Public Realm in Central Reading) encourage provision of public spaces, use of high-quality materials, provision of soft landscaping and green roofs and that development should also conserve and enhance the historic environment.
- 4.22 **Policy EM3** (Loss of Employment Land) which states that in locations such as the application site which are outside of the Core Employment Areas, loss of employment land will be assessed against a range of criteria.
- 4.23 **Policy EN12** (Biodiversity and the Green Network) seeks that all development should provide a net gain for biodiversity and **Policy CC8** (Safeguarding Amenity) states that development should not adversely harm the living environments of existing or new residential properties, including privacy, outlook and daylighting.
- 4.25 **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 related matters relating to development.

5.0 Planning Issues

- 5.1 At the outset given the listed nature of the buildings then Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving listed buildings or their settings or any features of special interest which they may possess.
- 5.2 There are of course also policies within the development plan seeking the same objectives.

Land Use & Comprehensive Development Issues

- 5.3 The site is located within the central core and primary shopping area of the town centre, on a prominent corner plot and a location that is highly accessible.
- 5.4 On this basis these proposals for a mixed use, with commercial uses at ground floor, are in accord with the Reading Borough Local Plan 2019 in terms of development within the town centre which seeks to facilitate the growth and diversification of the town centre and enhance its role as a regional centre.

- 5.5 Specifically, the nature of the mixed uses proposed are in accord with Policy RL1 (Network and Hierarchy of Centres) which seeks the vitality and viability of Reading as a Regional Centre to be maintained and enhanced.
- 5.6 In addition, Policy RL2 (Scale and Location of Retail, Leisure and Culture Development) states that the town centre will be the focus for new investment.
- 5.7 Furthermore, these proposals are further supported by Policy CR1 (Definition of Central Reading) which sets out that main town centre uses should be located within the Central Core area.
- 5.8 Clearly the commercial uses proposed at ground floor with residential above would “sit snugly” within such appropriate land uses as set out in the development plan.
- 5.9 The application site together with the neighbouring buildings at the former Bristol and West Arcade and Nos 173-175 Friar Street are in their entirety allocated for development within the Reading Borough Local Plan 2019 under **Policy CR14d**.
- 5.10 This policy states that the development principles for this overall site are:

Change of use of listed buildings and development of remainder for residential and/or offices with retail and related uses on the ground floor, retaining the arcade form.

Development should:

- ☐ *Avoid detrimental effects on the significance of the listed building and the Conservation Area and their settings;*
- ☐ *Take account of potential archaeological significance;*
- ☐ *Address noise impacts on residential use; and*
- ☐ *Address air quality impacts on residential use.*

Site size: 0.18 ha 36-54 dwellings plus ground floor town centre uses

- 5.11 These proposals seek to retain the existing retail (now Class E) units and the public house use on ground floor and convert the upper floors to eight residential flats which would sit within the overall requirements of Policy CR14d.
- 5.12 Whilst these applications propose development on only part of the overall site identified under Policy CR14(d) given the land uses proposed, and the fact that effectively the development has been recently supported by the Council, it is submitted that there would be no adverse impacts of dealing with this application in isolation from the remainder of the site.
- 5.13 Furthermore, these applications would address the need to repair and improve the appearance of the listed buildings within the “overall allocated site” and given planning history approval of these applications in isolation would not in our submissions hinder the potential successful comprehensive development of the site overall in accord with Policy CR14d.
- 5.14 The existing upper floors of the site consist of vacant former office space and albeit currently vacant the “loss” of office accommodation must be considered against Policy EM3 (Loss of Employment Land). This policy states that in locations such as

the application site, which are located outside of the Core Employment Areas, loss of employment land will be assessed against a range of criteria.

- 5.15 These criteria include accessibility (including access to the strategic road network), viability of continued use as employment and also the impact upon character and amenity of the area, surplus of similar accommodation elsewhere, need for other uses and whether or not the proposals would result in a piecemeal loss of employment land where there is scope for a more comprehensive approach.

- 5.16 In terms of the previous application (supported by Committee) on the site it is noteworthy that Officers considered, as set out in the officer report:

“Whilst the site is located conveniently for access to public transport, it is clear that other purpose-built office sites outside of the town centre benefit from more convenient access to the strategic road network.”

- 5.17 In terms of the loss of existing, albeit vacant, office space Officers concluded in terms of the previous application that:

“Given the prevalence of office accommodation elsewhere within the Borough Officers do not object to the loss of office employment accommodation nor that this proposal no longer brings forward the office accommodation secured under the extant permission.”

- 5.18 Furthermore, the provision of new housing is also supported by Policy H1 (Provision of Housing) which sets the housing provision target over the plan period.

- 5.19 It should also be noted that the site allocation Policy CR14(d) identifies that the use of the upper floors of development on the site should be in residential and/or office use and therefore there is clear potential for the site to come forward through the provision of residential accommodation in its upper floor land uses and such would in principle accord with this policy.

- 5.20 On this basis it is concluded that not only are the land uses proposed acceptable but they are supported by the development plan and would not only bring “back to life” these currently vacant listed buildings but also that such an approval would also result in significant investment into the listed buildings on the overall site.**

Heritage/ Townscape & Design

- 5.21 These applications are supported by an up to date Heritage Report as clearly the site is constrained by the listed buildings on site and the proximity the London Street/ Market Place Conservation Area nearby.

- 5.22 In addition, the site in terms of its immediately surrounding area contains important Listed Buildings including the Grade II* Town Hall and Grade I Listed St Laurence’s Church.

- 5.23 Unfortunately the listed building buildings at Nos. 27-32, whilst Grade II listed, are in poor condition both internally and externally. At the end of May 2021, we are advised that the previous owners of the site began a series of essential works and repairs to the listed buildings.

- 5.24 The listed building consent application is accompanied by the previously submitted detailed condition report of the listed buildings and the schedule of repairs.
- 5.25 The works to the listed buildings proposed under these applications are the same as those supported recently and also as previously approved under the 2018 consents.
- 5.26 In overview these works comprise internal works to re-provide the Class E (of the UCO) units and a public house at ground floor and the 8 new residential units above.
- 5.27 The major alterations relate to a demolition of a series of modern extensions to the rear of the listed buildings and the reinstatement of the original rear elevations of these listed buildings. Such would be undertaken using sympathetic materials and detailing.
- 5.28 In addition the proposals also include repair of the existing shop fronts and removal of modern shop front additions.
- 5.29 In this respect the Heritage Statement sets out a detailed assessment of all the external and internal changes proposed.
- 5.30 The conclusions of the Heritage Report are set out for ease below:

‘6.1 In summary, this Heritage Statement report has been prepared by Turley Heritage on behalf of our Client and the Applicant, to provide relevant and proportionate information to the local planning authority (RBC) with regard to likely built heritage impacts, and in support of applications for both Listed Building Consent and Planning Permission for the proposed development / works of the reuse, revitalisation and associated adaptations of the existing historic buildings on Site (Nos.27-32 Market Place).

6.2 As a starting point, it has been established that this Site includes a group of statutory listed buildings, is located within the designated Market Place / London Street Conservation Area, and also falls within the setting of a number of other listed buildings in this townscape area.

6.3 The requirement for this report therefore stems from Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which places a duty upon the local planning authority in determining applications for development affecting listed buildings to pay special regard to the desirability of preserving these building or their settings. Under Section 72, the Act also requires that special attention be given to preserving or enhancing the character or appearance of a conservation area with regard to development within that area.

*6.4 In order to comply with these statutory duties, and also national planning policy as set out in the NPPF 2021 (paragraphs 194-195), the designated heritage assets that have the potential to be affected (either directly or indirectly) by these proposals have had their significance described proportionately as part of this report (**Sections 2-4**). This is our updated built heritage baseline appraisal upon which the impacts of proposed further changes on Site have been assessed in this report.*

*6.5 **Section 5** provides a review of the new scheme and its likely impacts on the significance (and or setting) of the identified designated heritage assets. This assessment has also been undertaken in overall terms in light of the relevant*

statutory duties, national and local planning policy and guidance for change within the historic environment.

6.6 It is our assessment of these proposals that each of the designated heritage assets identified within the Site and its study area would each be conserved, and their significance either enhanced, sustained or otherwise unaffected. We have accordingly identified that these proposals have the potential to deliver a substantial number of “heritage benefits” (as defined by the NPPF / NPPG) that would enhance or better reveal the significance of not only each of the listed buildings on Site but also the surrounding conservation area and setting of other nearby listed buildings. Our identified heritage benefits can be listed again for ease of reference as:

- Securing the viable reuse of the listed buildings on Site (which are currently vacant and their conditions deteriorating) in the interests of their future conservation;
- Introducing a new mix of uses on Site to provided animation, vitality and visual interest for the street scene and wider townscape;
- Works of required repair, refurbishment and ongoing maintenance of the historic buildings, funded by their conversion and reuse;
- Reinstatement of a private residential entrance to the front elevation of Nos.27- 28 Market Place;
- Reinstatement of the front elevation of the former Coopers Arms closer to its original appearance;
- Removal of unsympathetic modern extensions to the rear elevations of the former Coopers Arms and No.32 Market Place, to better reveal the historic form and appearance of the listed buildings;
- Reinstatement of traditional timber sash window frames to No.32 Market Place;
- Reinstatement of the rear room of Nos.27-28 Market Place to its original ownership / function;
- Reinstatement of the original proportions of the street vault at basement level to Nos.27-28 Market Place; and
- Reinstatement of a staircase between the ground and upper floors of No.32 Market Place, as there would have been historically.

6.7 It should also be recognised that these proposals for the reuse and revitalisation of historic buildings addressing the Market Place would align with and support the objective recent government-funded “High Streets Heritage Action Zone” programme for Reading town centre, which is now being delivered by Historic England

6.8 In conclusion, these new application proposals would be in accordance with the key principles of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 with regard to listed buildings and conservation areas, national planning policy set out in the NPPF 2021 (paragraphs 194-195, 197, 199 and 206) and supported by NPPG, and local Development Plan, including the Reading Borough Local Plan 2019 and other SPD / SPG.”

- 5.31 In this respect Officers advised in terms of an assessment of the previous applications that they were satisfied that that internal works to the core areas of the listed buildings would “involve minimal loss of original fabric” and also that the plan form of the buildings “would be retained and, in some places, enhanced via reinstatement of internal walls.”
- 5.32 In addition the demolition of the poor-quality modern additions to the rear of these listed buildings and the associated reinstatement of original rear elevations would

be a significant benefit to them as indeed would be the removal of modern additions to the existing shopfronts.

- 5.33 The existing doors to the shopfronts that provide access to the currently vacant upper floor office accommodation would be retained and amended to provide access to the proposed 8 flats.
- 5.34 Overall it is submitted that the proposed works to the listed buildings would result in a number of improvements to them which would both preserve and indeed enhance their historic significance, including:
- Securing the viable reuse of the listed buildings on Site (which are currently vacant and their conditions deteriorating) in the interests of their future conservation;
 - Works of required repair, refurbishment and ongoing maintenance of the historic buildings, funded by their conversion and reuse;
 - Reinstatement of a private residential entrance to the front elevation of Nos.27-28 Market Place;
 - Reinstatement of the front elevation of the former Coopers Arms pub including removal of modern fanlight above entrance.
 - Removal of unsympathetic modern extensions to better reveal the historic form and appearance of the listed buildings;
 - Reinstatement of traditional timber sash window frames to No.32 Market Place;
 - Reinstatement of the rear room of Nos.27-28 Market Place (which had become incorporated within Coopers Arm pub footprint)
 - Reinstatement of the original proportions of the street vault at basement level to Nos.27-28 Market Place;
 - Reinstatement of a staircase between the ground and upper floors of No.32 Market Place, as there would have been historically;
- 5.35 Importantly the works proposed through these applications are identical to those which were supported by the LPA in terms of the most recent applications.
- 5.36 In conclusion therefore it is submitted that the development proposed through these applications would accord with the statutory duty and development plan policy affecting listed buildings, and would result in enhancement both visually and in terms of usage to these listed buildings. This scheme would constitute a high standard of design. As a result, the development would comply with the relevant heritage and design policies of the development plan and the advice pertaining to such within the NPPF.**

Residential Amenity and layout

- 5.37 Securing a good standard of amenity for all existing and future occupants of land and buildings is one of the core principles of the NPPF and the “test” in development plan policy terms relating to residential amenity is contained within Policy CC8 (Safeguarding Amenity).
- 5.38 Policy CC8 states that development should not adversely harm the living environments of existing or new residential properties, including privacy, outlook and daylighting.
- 5.39 Policy EN15 (Air Quality) specifically seeks to protect existing occupiers from poor quality and in addition Policy EN17 (Noise Generating Equipment) addresses matters of noise associated with plant equipment.

- 5.40 Furthermore, Policy CR6 (Living in Central Reading) requires new residential type development within the defined Reading Central Area to demonstrate how issue of noise and other disturbance from town centre uses have been considered and where necessary mitigated.
- 5.41 This application proposes eight residential apartments in the same layout and configuration on the upper floors of the site as previously supported by the LPA.
- 5.42 All of the residential units would meet or exceed the NDSS standards and the proposed flats would have outlook to both the Market Place and also to the rear of the buildings with many of the units being triple aspect.
- 5.43 Furthermore, all habitable rooms have at least one external window and are considered to be well served in terms of outlook and daylighting.
- 5.44 Policy H10 (Private and Communal Outdoor Space) sets standards for access to suitable private or communal outdoor space for new residential dwellings. Importantly the policy acknowledges that flats within central Reading are unlikely to be able to meet these standards in full.
- 5.45 Due to the location of the eight proposed flats, on the upper floors of Nos. 27-32 Market Place, these dwellings would not be served directly by private or communal amenity space. This situation is of course not uncommon for upper floor town centre residential developments with the flats being well served by leisure and recreation facilities within the town centre with Forbury Gardens close by.
- 5.46 The previous application was accompanied by a detailed noise assessment and mitigation scheme considering the existing uses surrounding the site.
- 5.47 It is noteworthy that this assessment and mitigation scheme was reviewed by the Council's Environmental Protection Officers who were satisfied that with the glazing, ventilation and insulation proposed future occupiers of the proposed flats would have an acceptable internal noise levels.
- 5.48 This application is supported by an updated Noise Impact Assessment given that these applications are in isolation of the previously submitted "overall development".
- 5.49 The conclusions of the Noise Assessment are set out below for ease
- Day and night period noise to the development site includes contributions from road and pedestrian traffic.
 - The development site is not exposed to especially high overall noise levels throughout the day or night periods.
 - Results of the noise survey are used to assess a scheme of noise insulation measures for the development. The scheme, which includes specification for acoustic performance glazing and ventilation, is verified by composite sound reduction indices calculation of the overall building envelope.

- 5.50 In this respect any implementation of these measures can be secured by appropriately worded condition. It is of course proposed to introduce secondary glazing to the front windows of the upper floor flats and details and specifications of this can also be secured by way of appropriate condition.
- 5.51 Given that these proposals seek the conversion of the upper floors into flats and the retention of the lawful ground floor uses in these buildings it is submitted that the development proposed would not result in any adverse impacts upon the residential amenities of existing properties within the local area.
- 5.52 Overall and in light of the above it is submitted that the development proposed would lead to good quality town centre residential accommodation avoiding any harm to the residents of any local residential properties and as such would be wholly in accord with Policy CC8.**

Transport & Highway Safety

- 5.53 The NPPF supports sustainable development provided such avoids sever harm to matters of highway safety. 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.
- 5.54 Clearly the site is highly sustainable being centrally located in close proximity to Reading rail station and is well served by bus links and public car parks.
- 5.55 On the highway access restrictions are in operation in Market Place whereby access is restricted to buses, taxis and permit holders between 07:00-11:00 and 16:00-19:00. There are a number of bus stops in Market Place as well as being a well-used bus route.
- 5.56 In addition there is a section of a 'no stopping' red route along Friar Street and this restriction prevents vehicles being allowed to stop unless they are within a dedicated loading bay.
- 5.57 Given the highly sustainable nature of the site no on-site parking is to be provided for the development. In light of the town centre location, existing extensive parking restrictions nearby and close proximity to public transport routes it is submitted that this is entirely the nature and type of site in which a car free development is supported by national and local policy.
- 5.58 Service access to the ground floor commercial units in Market Place is proposed via Market Way thereby accessing the rear servicing areas of Nos 27-32 Market Place.
- 5.59 Servicing vehicles are proposed to use existing on street loading bays on Market Place and Friar Street. This arrangement is consistent to previous uses and other businesses in the area
- 5.60 Refuse will be stored the courtyard area for the Market Place units (both retail units/pub and flats). Refuse collection is also proposed from Market Place via Market Way.
- 5.61 The retail units and public house use would incorporate mix of internal and external cycle stores with external storage located in the rear courtyard area.

5.62 Overall it is submitted that the development would be highly sustainable and would lead to no adverse impacts upon local highway conditions

6.0 Conclusion

6.1 There are considered to be a number of benefits associated with the proposed development which includes:

- Provision of 8 residential dwellings towards the Borough's housing supply
- Repair and refurbishment of grade II listed buildings at Nos. 27-32 Market Place
- Re-provision of public house and two retail units within Market Place active frontage
- Revitalisation of a prominent vacant and derelict site within the town centre.

6.2 This development has been supported recently by the LPA as part of a larger development proposal yet this scheme does not deviate in any way in terms of the land use, alterations, additions to this particular development option for this element of the larger site.

6.3 Given that the proposed development addresses only part of the overall site allocation identified in Policy CR14d it does nonetheless bring forward new residential development, the retention of the commercial uses on Market Place together with the substantial improvements to the listed buildings and therefore meets the principal aims of this policy in relation to this part of the overall allocate site.

6.4 It has been shown, and indeed evidenced by recent planning history, that the development proposed would avoid harm to existing neighbouring buildings, create an acceptable residential quality of development as well as avoiding any harm to matters of highway safety. The commercial uses of the ground floor are also supported in a location such as this as are the proposed residential units in upper floors.

6.5 The development would clearly enhance the existing listed buildings on the site and would comply with the statutory test for any development affecting the fabric or land uses within listed buildings.

6.6 Whilst this site forms part of a larger "allocated" development site it is submitted that this individual application(s) would not prejudice the overall aims and aspirations of Policy CR14d.

6.7 On the basis of all of the above it is concluded that the development proposed is in accord with the development plan, would create good quality mixed use development in a highly sustainable location and on that basis is compliant with sustainable development and allocation Policy CR14 (d) of the Development Plan.