

Planning, Heritage, Design & Access Statement



**In support of a proposal for alterations to rear elevation
only including new and revised fenestration**

**Site at 175 Friar Street
Reading
RG1 1HG**

June 2023

1.0 Introduction

- 1.1 This Planning, Design and Heritage Statement has been prepared by Allen Planning Limited on behalf of our client to support a planning application for alterations to the rear elevation only of this building including the removal of some windows, the introduction of new windows and rendering the external wall.
- 1.2 The building in its entirety is currently vacant but was last used for purposes falling under Class E of the UCO. The site is the subject of an extant prior notification application consent under LPA reference 220577 for the conversion of the three upper floors to form 6 apartments.
- 1.3 The purpose of this Statement is to describe the relevant site context and surrounding area together with the details of the proposed scheme development. It also outlines the planning policy context and provides an assessment of those policies that apply to the scheme development.
- 1.4 The site lies within the Town's Conservation Area and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 places a duty on the local planning authority, to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 1.5 This Statement therefore also includes a Heritage Impact Assessment.
- 1.6 In overview the application is a simple one namely the creation of new and altered fenestration into the rear elevation only together with the application of a render to the rear elevation.
- 1.7 The application proposes no alterations to the six approved flats in the upper floor levels which are currently on going or indeed the ground floor commercial unit and also no alterations are proposed to the principal elevation of the building fronting onto Friar Street.
- 1.8 In overview of these alterations firstly, the existing timber sash windows in the south elevation of 175 Friar Street as shown on drawing '*1077-052 Existing Rear/South Elevation*' are proposed to be removed.
- 1.9 In addition, new window openings are then to be formed within the existing brickwork and new timber sash windows inserted as shown on drawing '*1077-053 Proposed Rear/South Elevation*'.
- 1.10 In order to improve the appearance of the rear elevation and cover the current "scaring" of the of this elevation the existing walls are to be rendered over with an off-white render to provide a consistent finish.
- 1.11 The materials proposed are set out on the proposed elevations and for ease are also identified below:
 - K Rend Silicone Thin Coat. Colour - Mink
 - Timber sash window, painted.
 - Colour - Grey/Ral 7032 New replacement metal safety rail

2.0 Site Location

- 2.1 The site is not a listed building but does lie within the Conservation area. The site is highly sustainable being within the heart of the town centre with access to several local bus services, as well as being located in close proximity to Reading Station, but has no off street car parking.
- 2.2 The site does not lie within an area at risk of flooding (Flood Risk Zone 1) and is only partially at low-medium risk from surface water flooding within the existing public walkway.
- 2.3 The building is currently vacant and was in a poor state of repair and is currently undergoing conversion in its upper floors to form 6 apartments.
- 2.4 It is understood that the building was constructed in the 1950s, following bomb damage from World War II and sits adjacent to a four-storey mixed use terrace at Nos 173-174. The general location of the site is shown in Figure 1 below.

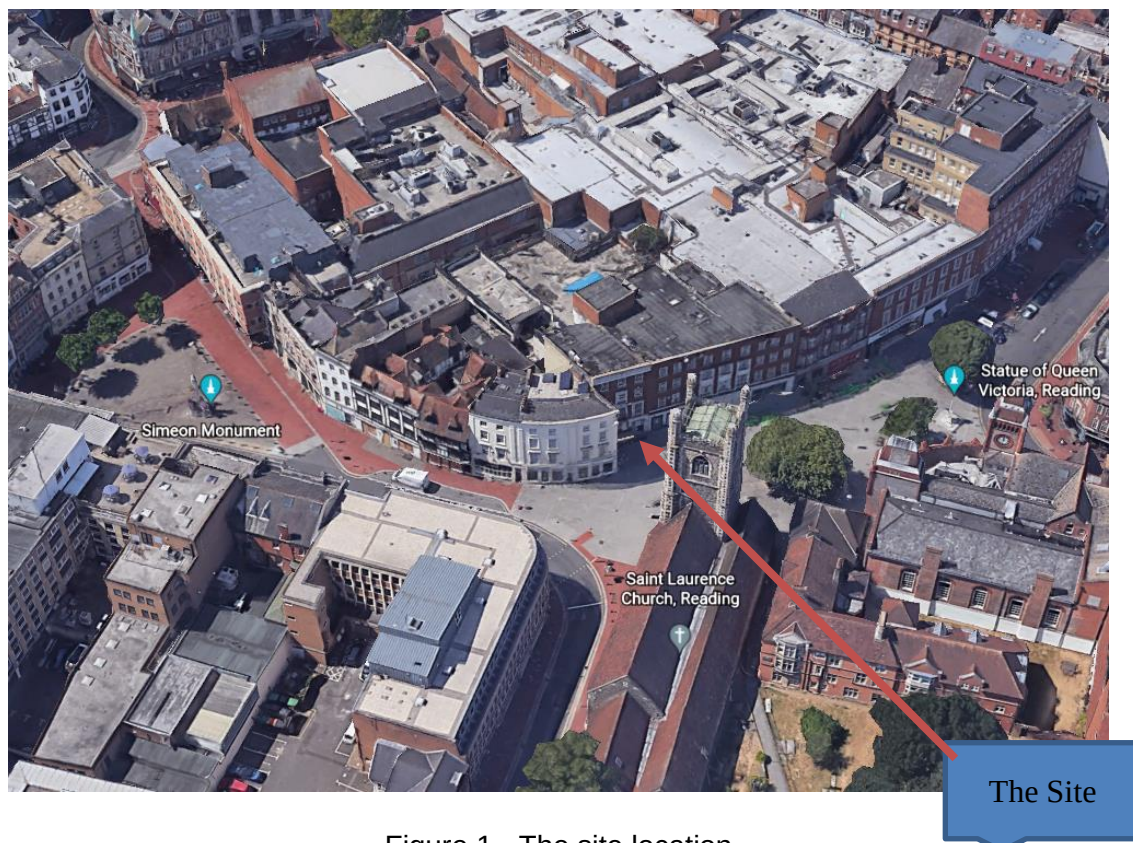


Figure 1 - The site location

- 2.5 The site's frontage is shown in Figure 2 below.



Figure 2 – Site Frontage

3.0 Planning History

- 3.1 In terms of material planning history, this site has a long history as part of a larger “development site” however in terms of recent permissions, the site has the benefit of a prior notification application consent under LPA reference 220577 for the conversion of the three upper floors to form 6 apartments.
- 3.2 In this respect the external alterations to the rear elevation as proposed in this application seek to improve the quality of these approved upper floor flats.

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 National Planning Policy Framework, and the Reading Borough Local Plan 2019.

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

Design

- 4.4 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.

- 4.5 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

- 4.6 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 design, 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

Heritage

- 4.7 In terms of heritage matters paragraph 194 states:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

- 4.8 Paragraph 195 adds that “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.”

Key Policies of the Local Plan

- 4.9 This site along with the neighbouring buildings 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.*

- 4.10 **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.
- 4.11 **Policy EN3** (Enhancement of Conservation Areas) seeks that the special interest and character of such areas is conserved and enhanced
- 4.12 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.

5.0 Planning Issues

- 5.1 Given the form and type of this application the material considerations for this application are matters of impacts on townscape, including heritage impacts, and the amenities of neighbouring properties/buildings.

Design, Heritage and Townscape

- 5.2 Development requiring a high standard of design forms part of the backbone of the NPPF and also various policies within the development plan seek the same aspirations.
- 5.3 The site lies within a Conservation Area and thereby Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 places a duty on the local planning authority, to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 5.4 The application site forms a relatively modern building within this more historic area and therefore already displays considerable differences within its design, materials and fenestration when compared to the more historic elements of this part of the Conservation Area.
- 5.5 The alterations to fenestration proposed, and as set out in detail in Section 1 of this Statement, through this application would have no adverse impacts upon the character of the conservation area.
- 5.6 Turning now to matters of appearance given that the application site constitutes a more modern addition to the more historic built forms of the conservation area and would be entirely contained within the rear elevation it is submitted that the alterations to the fenestration as proposed would also leave the appearance of the Conservation Area unharmed.

- 5.7 The introduction of render to the rear elevation would not constitute an unusual material within the wider conservation area itself and again would be confined solely to the rear elevation.
- 5.8 The revised fenestration and addition of render to the rear elevation, as proposed, would improve the sustainability of the building itself and would not adversely affect the design ethos of the building and in such respects would therefore constitute a good design standard given the relatively minor nature of the application as proposed.
- 5.9 In light of the above it is submitted that the alterations proposed in this application would preserve both the character and appearance of the Conservation Area and constitute a good standard of design in accordance with guidance and development plan policy.**

Impact upon neighbouring buildings

- 5.10 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).
- 5.11 Policy CC8 states that development should not adversely harm the living environments of existing or new residential properties, including privacy, outlook and daylighting.
- 5.12 The majority of the surrounding buildings are commercial in nature with some residential properties at upper floors especially those granted consent and the subject to currently outstanding applications.
- 5.13 Whilst the proposal would result in some additional and alterations to existing windows such would be across significant distances and of course, windows already exist at these floor levels within the building already.
- 5.14 It is as a result of the above submitted that the provision of the amended fenestration, as proposed, would not result in loss of significant amenity to any neighbouring properties.
- 5.15 In addition the amended fenestration proposed would not in any way prevent the successful onward operation of any neighbouring commercial uses.
- 5.16 In light of the above we consider that these proposals take due account of the amenity of neighbouring properties and land uses and are wholly compliant with the requirements of development plan in these regards.**

6.0 Conclusion

- 6.1 These proposals seek to create external alterations to the rear elevation of this building only including new and revised fenestration and also the application of a render to the existing wall which has a poor visual appearance. It is submitted that such would not adversely impact the design of the host building or the wider visual amenities of the Conservation Area.

- 6.2 Furthermore, the proposed development would avoid any adverse impacts upon the amenities of neighbouring properties or land uses.
- 6.3 There is a statutory duty for any development within the Conservation Area to preserve or enhance its character and appearance. In this case there would be no change to the character of the building of the conservation area in terms of land use.
- 6.4 Overall the proposal would improve the appearance of the rear elevation and would seek to provide a more cohesive and regimented approach both in terms of size and position of fenestration within the rear of the building especially given its new residential use on upper floors. It is submitted that such an approach would also leave the appearance of the Conservation Area unharmed.
- 6.5 On the basis of all of the above, it is concluded that the development proposed is in accord with the development plan and the statutory test and should be approved.**