

Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Reference: 285001

5 May 2022

Dear Sir/Madam

233 London Road, Reading, RG1 3NY
Planning application

Verve Planning

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Reg no. 11491335

On behalf of our client, Reading Foods Ltd, we are pleased to submit a planning application for provision of a Class E unit at ground floor with new storey and rear extensions to No.233 London Road for 3 flats; a new detached two storey building to the rear with 3 flats; various alterations and provision of ancillary facilities.

This application follows pre-application advice (Ref: 211790/PRE) received on 17 December 2021 regarding an earlier iteration of the above development. The officer feedback was generally supportive, but it did require various changes / provision of further information in advance of the planning application being submitted. The proposed scheme has therefore been amended to take account of this pre-application advice to ensure it is acceptable in planning terms.

The following information is included within this planning application:

- Completed Application form;
- Drawings prepared by HPF Architects include:
 - Location Plan (existing and proposed) – PD01/C;
 - Existing Plans and Elevations – PD01/Rev C;
 - Proposed plans and elevations – PD02/Rev E;
- Noise and Vibration Assessment;
- Air Quality Assessment;
- Energy and Sustainability Assessment;
- Planning Statement;
- CIL form; and
- Application fee including service charge

Site Description and Background

The application site measures approximately 0.025 hectares and contains a two-storey end of terrace building located on the corner of London Road and Amity Road. It contains a vacant commercial unit at ground floor and a separate two bed flat above accessed via steps at the rear. The rear of the site is currently vacant and secured (by locked gates and a wooden barrier). In the past there was a two-storey storage building in the rear section of the site, but this has since been demolished. No parking was allocated to the betting office or flat as the space at the rear was previously leased to a nearby mechanics.

The surrounding area comprises a mix of commercial uses on London Road with flats/offices above and to the rear and residential streets to the north. There is a large Cemetery opposite the site. Amity Road is a one-way street with cars only able to travel south and exit onto London Road.

There is a service road running along the rear of the site serving a number of workshop uses. There is a loading bay on the main road to the front of the building which is used by local traders.

Photographs of the site



Photo **above** of rear of site.



Photo **right** of front of site.

Planning History

The council's on-line planning records indicate the following decisions at the site:

- 00/01356//FUL – refurb and enlarge existing shop and flat over. Demolish existing workshop and construct maisonette and one bedroom flat over 3 garages with shared courtyard between. Granted April 2001.
- 79/TP/0287 – demolition of part of rear of existing betting office erection of an extension and alterations. Granted 1 May 1979.
- 15478 – Betting office shopfront. Granted 19 April 1968.
- 15172 – Use as betting office. Granted 8 December 1967.

Planning Policy Context

Development Plan

Planning decisions need to be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Reading Local Plan (2019).

According to the council's adopted Proposal Map, the front part of the site falls within the boundary of Cemetery Junction district centre and identified as a Key Frontage in this centre. It is also in an Air Quality Management Area (AQMA). London Road is a part of the Classified Highway Network.

The properties are not statutory Listed Buildings or locally listed and do not fall within a Conservation Area, but opposite the site is Reading Cemetery which is a Grade II listed Registered Historic Garden (list entry 1001641). The gardens are also classed as an Area of Identified Biodiversity Interest.

Material Considerations

The National Planning Policy Framework (NPPF 2021) along with the National Planning Practice Guidance (NPPG) are important material considerations in the determination of planning applications. The council also has various adopted SPDs which provide guidance on various matters such as affordable housing, sustainable construction, and parking.

Planning Assessment

Principle of the Development

The proposed development is for a mix of Class E and residential uses.

In terms of the principle of housing, there is policy support at all levels to provide housing in urban areas, including in airspace above existing buildings.

The NPPF (2021) recognises at paragraph 69 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' and that local planning authorities should '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'.

Further, the NPPF at paragraph 120 states that planning 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';
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
- 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.

The site is in a sustainable location and accords with Local Plan Policies CC1 and H1 of the adopted Reading Local Plan. Policy H1 supports the provision of additional homes in the borough with the supporting justification confirming 'there is a pressing need for additional housing in Reading and the surrounding area'. It also confirms that housing provision involves a heavy reliance on previously developed land and that an allowance has been made for windfall development on sites of less than ten dwellings of 127 dwellings per year. The proposed development is previously developed, within the urban area and would comprise a windfall development of less than ten units.

In terms of the town centre policies, Local Plan Policy RL1 Network and Hierarchy of Centres advises that Cemetery Junction is a District Centre wherein the vitality and viability of the centre should be maintained and enhanced. It acknowledges that development and change, including intensification of town centre uses will take place in the smaller centres. The policy states that the following improvements are

acceptable in all centres: Accessibility and transport improvements; Broadening range of facilities; Residential use of upper floors; and Environmental enhancements.

Policy RL3 Vitality and Viability of Smaller Centres states that development will be permitted provided that 'there would be no net loss of 'centre uses' for non-centre uses' at the ground floor ...'.

Collectively, therefore, the above policies support the principle of the proposed uses on this previously developed district centre site. They also support the more effective use of under-utilised sites, recognising that district centres are likely to undergo change. This position is confirmed in the pre-application feedback. Furthermore, it is of note that a similar type of development was previously approved by the council in 2001. Overall, therefore the principle of the mix of uses should be regarded as acceptable.

Ground Floor Class E Use

The last use of the commercial unit was as a betting shop (which began in the late 1960s), but this ceased in around 2019 and the unit has been vacant since that time. A betting office is classed as a sui generis use. The planning application proposes to replace this with a Class E use at the ground floor which are encouraged in district centre locations (nb the Local Plan pre-dates the change to the Use Classes Order in 2020 which therefore references the former use classes). The proposed Class E use would help ensure a strong retail character is maintained in this district centre.

We note that council's Annual Monitoring (AMR) report 2020-2021 (December 2021) refers at paragraph 9.11 to the 2020 change to the Use Classes Order and states that 'this means that parts of the policy controlling uses in centres will no longer be possible to implement for future monitoring years'. Whilst the council appear to accept, therefore, that the district centre policies cannot be implemented, we have, in any event, assessed the application proposals against each of the four parts of Policy RL3 (parts a-d) as follows:

Part a) – permits development involving a net loss of A1 and A2 to other 'centre uses' where there would not be more than 3 consecutive units not in A1 and A2 retail use; and the proportion of the total length of the Key Frontage within Cemetery Junction in A1/A2 uses would exceed 60%.

RESPONSE – notwithstanding that the Use Classes Order has been amended since this policy was adopted, as the application site is currently classed as a sui generis use, there would not be a net loss of the former A1/A2 uses (which policy RL3 seeks to retain). Conversely, the proposal would replace the existing sui generis use with a Class E use (which includes the former A1/A2 uses).

The West Berkshire Authorities Retail & Commercial leisure Assessment 2016 states that 'Cemetery Junction is located at the junction of London Road and Wokingham Road, west of Reading Old Cemetery. The centre includes a Tesco Express and Co-operative foodstore. London Road is dominated by takeaway food and lower-quality retail outlets however across the rest of the centre there is a reasonable offer of comparison, financial and professional services and a pub and post office'.

The council's AMR 2020-2021 (December 2021) indicates that in 2021 64.1% of the 'key frontage' of Cemetery Junction was in the former Class A1/A2 uses (with 60% being the target) and that 14% was in the former Class A5 use (30% being the target). This suggests that Cemetery Junction is performing well against policy.

Part b) – permits development within district centres, provided that:

- there would be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use; and
- there would be no net loss of ‘centre uses’ for ‘non-centre uses’ at the ground floor (apart from entrances to upper floors) except in exceptional circumstances. On upper floors, other uses including residential (‘living over the shops’) will be acceptable.

RESPONSE – the proposal would not result in two consecutive takeaways. There would be no net loss of ‘centre uses’ as a result of the proposal as it includes a ground floor Class E unit (in place of the betting office use). We assume this would be regarded as a positive change to this frontage therefore.

Whilst the floorspace would be reduced by 25 sqm GIA, the proposed Class E unit has been designed for the intended occupier, Maharaja Sweets, who have confirmed that this level of floorspace is sufficient for their operational requirements with the shop space mostly comprising displays and counters.

The ‘lost’ floorspace comprises part of the rear of the building which has been rationalised to be partly used as the dedicated refuse storage area for the commercial unit (and therefore arguably part of the ‘centre use’) and partly for much needed housing, also regarded as appropriate in district centres. As the ‘key frontage’ of Cemetery Junction is performing well against its targets (64.1% being in the former A1/A2 uses and only 14% in the former A5 uses) and the loss of ‘centre use’ floorspace is very modest, we do not consider the proposal would harm the objective of this policy.

Part c) advises that within and adjacent to district centres, ‘all new development should provide some ‘centre uses’ at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate’.

RESPONSE – The proposal does include a ‘centre use’ at ground floor and therefore accords with part c of the policy.

Part d) – advises that ‘where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed, as a result of redevelopment, meaning that criteria a) and b) cannot be applied, proposals should ensure that a strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaways, are avoided.

RESPONSE – the Key Frontages of Cemetery Junction district centre are exceeding their targets for the former A1/A2 and A5 uses, suggesting that this centre is performing well against policy. The proposal would also ensure that a ‘strong retail character’ is retained at ground floor.

Conclusion on Policies RL1 and RL3

Overall, therefore we consider that the principle of the proposed Class E use (with reduced floor area to the existing use) should be considered acceptable and in accordance with policies RL1 and RL3 of the local plan.

Design and Character of the Area

Policy CC7 (Design and the Public Realm) seeks to ensure that new development is high-quality and maintains and enhances the local character. The National Design Guide also stresses that development should respond positively to the existing local character and identity.

The pre-application advice received in respect of a previous scheme indicated that officers were supportive of the proposed scale and massing and additional floor, but there were certain elements that would not be supported such as the flat roof addition to the rear detached building. In this regard, the following key changes have been made to the scheme to address the officer's previous advice:

- Removal of rear two storey kitchen / bathroom section of extension to existing building to create an amenity space and area for cycle storage.
- Replace 2 studio flats with a 1 bedroom duplex flat in rear extension to existing building.
- Replace flat roof over access stair to new detached block with a pitched roof to correspond with the proposed main roof;
- Provision of additional one bed flat within the roof space of the new rear block;
- Remove all studio flats so proposed mix now comprises 4 x 1 bed units and 2 x 2 beds.
- Provision of private terrace for all 6 flats together with a shared amenity space.
- Reposition bedrooms in front building to the rear away from the main road.
- Increased planting zones including addition of small trees.

The streetscene in the vicinity of the site is varied, although comprises largely terraced 2/3 storey buildings with commercial ground floor and residential, commercial or ancillary uses above.

The proposal creates an attractive addition to the area that responds to the previous comments of officers. The frontage building would increase by a storey to three storeys, as per the neighbour to the west, but the ridge has been set slightly lower to differentiate from the adjoining building. The new second storey windows at the front follow the same design as the existing building, albeit smaller in scale – being a common design approach as windows ascend a building. The roof covering would be of slate-effect tiles in keeping with the area. The pre-app response stated that 'the proposed second floor extension at no. 233 London Road would be suitably in keeping with the existing building and would be of the same roof form (pitched) as the existing'.

Although officers were happy with the scale in the pre-app scheme of the rear part of the extended No.233, the application proposals reduce the amount of development to create a larger space between the front and rear buildings. The rear elevation of the extended building has a simple design with rear gable and doorway to small terrace at roof level. The rear extension extends to a similar level as the existing two storey rear projection but essentially infills the area to the east. This design fits in with its neighbours and the wider area. In terms of fenestration, the windows follow the same design as the existing and others in the locality.

Previously officers commented that 'the rear extension would be suitably set down from the ridge of the building and fenestration additions would remain consistent with the pattern and scale already found on the building'.

The new detached building (containing 3 x flats) is 2.5 storeys with accommodation set within the pitched roof of the top floor. Its design follows that of the local area and follows the form of the two storey storage building that historically sat on this part of the site. This part of Amity Road has an array of buildings with many of the London Road properties having filled their entire sites with buildings with entrances to the alley to the rear. The proposal would deliver a positive addition to the area and result in a vast improvement to the current degraded streetscene in this part of Amity Road.

Overall, therefore we consider the proposal sits comfortably in the streetscene and would be an improvement to the visual amenity of the area, in accordance with Policy CC7.

Setting of the registered historic park at Reading Cemetery

Reading Cemetery is a Grade II listed Registered Historic Garden (list entry 1001641), added to the statutory list on 14 August 2002. Whilst the western end of the gardens is opposite (south) the site frontage, it is bounded by a brick wall and separated from the site by the main London Road. See Google aerial photo **below**:



The proposed changes to the frontage are modest in nature and scale and would be no taller than other buildings in the vicinity of the site. In this regard, we consider it unlikely that the proposed development would harm the setting of the listed gardens or the significance of this designated heritage asset.

Housing Mix

Policy H2 states that “wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms.” For market housing the mix is identified as 1 beds 10.3%, 2 beds 29.6%, 3 beds 41.5%, 4 beds 18.5%.

Previously, officers queried the proposed mix of residential units (4 x studios and 2 x 2 beds) in the context of Policy H2 which suggests that more 2 and 3 bed units are required.

The studios have now been replaced with 1 bed flats to create a better quality of housing. As the site is in a sustainable district centre location, we consider it is entirely appropriate for the site to deliver smaller units of 1 and 2 beds. The two bed units are 2b3p and therefore could accommodate a small family, but due to the space constraints of the site and the need to deliver an effective use of land, it would not create a suitable environment for larger family accommodation.

In this context, the development would make a positive contribution to the housing mix of the area in accordance with Policy H2.

Residential Amenity

Policy CC8 (Safeguarding Amenity) of the Local Plan 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 addressing concerns over any potential light impacts for neighbours, the development has been set away from the boundary with No. 231 at the upper level. The drawings show that the rear extension would not infringe on an area measured at an angle of 45° from the midpoint of the closest window to a habitable room in the neighbouring property at No.231. Other neighbours are some distance from the site and therefore unlikely to be negatively affected. This is confirmed by officers in the pre-application feedback. Due to the orientation of the proposal, surrounding uses/context and width of Amity Road, overlooking and outlook issues are unlikely to be a problem for existing neighbours.

The internal arrangement and spacing between the front building and new detached building have been redesigned to address previous amenity concerns of officers. The ground floor of the duplex flat has windows on the ground floor that now overlook the newly created amenity space. The proposal now overcomes previous concerns regarding the amenity of future residents, including the outlook of the rear ground floor unit.

Space standards

Local Plan Policy H5 states that new dwellings should meet the minimum national prescribed space standards. The proposed 6 flats meet the standards as follows:

Front Building

Duplex Flat - 1b2p is 58.2sqm (58sqm)

First Floor Flat – 1b1p 37sqm (37sqm)

Second Floor Flat – 1b1p 39sqm (39sqm)

Detached Building

Ground Floor Flat – 2b3p is 64.1sqm (61sqm)

First Floor Flat – 2b4p is 61sqm (61sqm)

Second floor Flat – 1b1p is 43.7sqm (39sqm)

Amenity Space

Policy H10 provides guidance on the level of amenity space that should be provided for flats and houses. Flats may be provided with communal outdoor space, balconies and/or roof gardens. The policy suggests that as a guide flats outside the core centre should achieve 25 sqm per 1 and 2-bedroom flats, but the pre-application response has indicated a lower provision would be appropriate given the site's close proximity to Palmer Park. Officers suggested that terraces are likely to be acceptable, but all flats should have access to private, meaningful amenity space.

In this regard, all the proposed flats have been given some private space in the form of a terrace. Residents would also be able to utilise the private communal amenity area at the rear of the site. Overall, therefore, given the site's location, we consider the proposal would provide an acceptable amount of amenity space.

Noise

KP Acoustics has prepared a Noise and Vibration Impact Assessment Report to accompany the planning application. This has assessed the suitability of the site for residential and whether any measures are required to mitigate any potential noise and vibrations effects.

The Noise and Vibration Assessment concludes that:

An environmental noise and vibration survey has been undertaken at 233 London Rd, Reading RG1 3NY allowing the assessment of daytime and night-time levels likely to be experienced by the proposed development.

Measured noise levels allowed a robust glazing specification to be proposed which would provide internal noise levels for all residential environments of the development commensurate to the design range of BS8233.

Although noise levels within external amenity areas would not be expected to meet the recommended levels provided within BS8233:2014, this is typical of city centres adjoining the strategic transport network and therefore development should not be prohibited.

No further mitigation measures should be required in order to protect the proposed habitable spaces from external noise intrusion.

Measurement of road from road activity indicates that vibration levels are below the threshold of human perception in the z-axis, in accordance with BS6472: 2008.

Overall, it is concluded that there are no noise and vibration constraints to the proposed development.

Air quality

As the site is in an AQMA, an Air Quality Assessment was prepared by Ramboll to consider the baseline air quality conditions, assess the suitability of the site for residential development and understand if any mitigation measures are required to protect residents from the effects of poor air quality.

The Air Quality Assessment concludes that:

- Available monitoring data indicates that concentrations of NO₂, PM₁₀ and PM_{2.5} are currently likely to meet the long and short term NAQOs at the development site.
- The dust risk assessment has identified that construction activities pose a low dust risk. However, with the implementation of the mitigation measures detailed in Table 6-4, the activities are not expected to result in significant effects on local receptors.
- NO₂ annual mean, NO₂ one-hour mean, PM₁₀ and PM_{2.5} annual mean and PM₁₀ 24-hour mean concentrations are expected to meet the NAQOs at all floor levels when the Proposed Development is operational.
- The site is considered suitable for the development type proposed from an air quality perspective and no additional air quality mitigation is required to protect future site users from poor air quality.
- The Proposed Development would not result in significant effects on air quality.
- The Proposed Development meets local air quality policy requirements.

Overall, it is concluded that there are no air quality constraints to the proposed development.

Transport, parking and storage

There is no parking at the site for the retail unit or the flat as per the existing situation. It is understood that the rear part of the site was previously let to a nearby mechanics to store cars. Parking/loading provision for the shop would not therefore be lost.

We note that the council's parking standards do normally require 1 parking space per dwelling, but as the site is close to bus routes and within a CPZ, officers have advised that a car free scheme would be acceptable, subject to entering into a legal agreement to exclude future residents from securing parking permits.

There is a loading bay near the front of the site to the west positioned in the bus lane, which could be utilised by the development.

In terms of cycle and bin storage, this is provided at the rear of the site. Six secure and covered cycle bays are provided for residents. Bin storage is provided facing the pavement for the flats. The retail unit has a separate refuse store at the rear of the unit.

Biodiversity/landscaping/trees

Policy EN12 states that on all sites, development should provide a net gain for biodiversity wherever possible. The existing site is fully developed and devoid of any biodiversity. Despite the constraints of the site, the proposal has included amenity space with new trees along with other landscaping area. This should help with addressing the policy along with the aims of the AQMA in terms of tree planting.

Sustainability/energy

MES Building Solutions has prepared an Energy Statement to accompany the application. This provides an overview of how sustainability will be promoted both during and after construction and to establish predicted energy requirements for the proposed development. It illustrates how energy efficiency measures in conjunction with renewable generation can be used to reduce the predicted energy consumption and associated carbon dioxide emissions. It also shows how water use will be minimised.

MES has calculated the total energy requirements for the development using Part L 2013 SAP calculations. The required carbon reduction has been achieved by the use of improved building fabric over the part L 2013 baseline requirements; and use of ASHPs for both the space heating and DHW source. This shows a cumulative saving on site of 51%.

Water efficient fittings will be installed to ensure a mains water consumption of 110 litres per person per day.

The above therefore complies with policies CC2, CC4 and H5 and the Sustainable Design and Construction SPD.

Affordable Housing

We note that Local Plan Policy H3 requires a financial contribution towards affordable housing of schemes of one dwelling or above. On sites of 5-9 dwellings, policy advises that a financial contribution equivalent to 20% of the housing would be sought to be provided as affordable housing elsewhere in the Borough. As policy considers that a Registered Provider (RP) could fund around 50% of the market value of a unit,

then they would need a financial contribution of the remaining 50% of the market value to provide each unit. The contribution is calculated using the GDV of the proposed development. The SPD states that:

'The financial contribution will usually be directly proportionate to the GDV of the scheme assuming it is 100% private sales. As the financial contribution required by an RP to fund one unit is 50% of a unit's market value, the financial contribution equates to 50% of the proportion required under policy.'

Therefore, the following will generally apply:

- *For sites of 5-9 dwellings, where the contribution required by policy H3 is 20%, this will equate to 10% of the GDV of the development.....*

Our client is happy to provide a contribution to affordable housing, subject to viability, and will supply a GDV valuation in due course to establish the precise financial contribution.

Conclusion

As demonstrated above, the site offers an opportunity to provide a new Class E use and additional residential accommodation within a sustainable district centre location. The proposal complies with planning policy at all levels and should be approved without delay.

We look forward to hearing from you regarding validation.

Yours faithfully



Helen Greenhalgh

Enc: Listed on page 1
cc: Mr A Dhaliwal