

The Keen Partnership – 18.02.2022

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Response to:

210077/PREAPP at 75-77 London Street and Land to Rear
Pre-Application Advice for Proposed demolition of buildings to rear (Olympia Hall) and erection of 12 flats with associated parking, landscaping and courtyard garden and conversion of ground floor of no.s75-77 to 3 flats

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18th January 2022

Overview of proposal:

- Demolition of existing hall.
- Erection of two distinct newbuild flats providing 12 units total, 6 units each.
- Ground floor of existing, Change of use of from sui generis to C3. Involving a ground floor extension to rear of existing 75-77 London Street. Providing three new flats to ground floor of existing.

Surveys Included with current submission:

- Transport Statement with CMS
- BAT Scoping Report
- Heritage Statement
- Daylight Sunlight Assessment
- Condition Report
- Noise Survey
- Air Quality Report
- Valuation Report

Surveys underway, to follow Shortly:

- Landscaping & Landscape Principles
- Energy Statement / Sustainability Statement
- Archaeological Statement

Demolition of the large full width single storey rear projection which integrates with the rear hall and extends over 50m from the rear elevation of the London Street buildings and its replacement with a much more modest single storey rear extension (to facilitate conversion of the ground floor of the frontage buildings to three flats) is considered beneficial to the setting and historic character of the Grade II and Grade II* listed frontage buildings. Notably this allows provision of three rear garden areas which would serve the ground floor flats and in part re-provides the garden space historically found to the rear of the buildings which is also considered of benefit to the setting of the conservation area (subject to design details). As advised by Historic England, provision of a rear extension of single storey scale only allows views of the more historically significant upper floors of the rear of the building from East Street within the conservation area to be retained. Rear extensions of greater than single storey scale would therefore be considered harmful to historic character of the conservation area and setting of the listed buildings and would not be supported.

- We confirm Historic England are supportive of this design approach, revealing the significance of the listed 75-77 London St from the aspect of East Street.

In terms of detailed design of the proposed restoration of the rear elevations of the London Street buildings, the use of red brick as the facing material and windows style, including cills, lintels detail and window bars to match the upper floors is considered appropriate. I note Historic England are supportive of the design approach indicated in the submitted design pack including continuation of a 'tower style' bay window down to ground floor level and inclusion of characteristic Georgian style railings at first floor parapet level. The proposed removal of the existing modern rendered section at first floor level to the rear elevation of the buildings in order to reveal the original fabric brickwork underneath is also welcomed, but as advised by Historic England, should only be pursued if it can be clarified that removal of the render would not result in damage to the original fabric and structure of the building which would otherwise negate any benefit of removal of the render. Specialist advice should be presented on this detail.

- It is proposed existing render to First floor to be actioned by Condition, subject to specialist survey owing to the potential damage the existing structure may incur if render is removed.
- External materials have been selected based on a character analysis present in the (Updated Design and Access Statement) both for their visually appeal and sensitive response to local character. Materials selected were identified present on site, and in locality. It is proposed Material selection to be a Condition actioned by Discharge.
- Balcony design is based on Sample Georgian Balcony Railing Provided by H.E. Fixing method for railings will be historically consistent. Embedded in coping stone. See image below:



Fig 4 – Sample Georgian Balcony Railing Provided by H.E

The submitted design pack indicates that no alterations, aside from removal of existing signage, are proposed to the principal London Street elevations of the buildings. This is considered to be the correct approach. Material alterations to these elevations would not be welcomed given their significance and contribution to the character of the conservation area. However, Officers note the poor condition of many of the windows to the front elevation of the buildings and a scheme of window repair/refurbishment/replacement should be submitted with any future applications.

- Based on survey (Condition report relating to 75-77 London Street Reading) the general condition of the building has been appraised. Based on feedback from HE at an earlier stage of our current proposal (Request for Pre-application Advice ref: PA01160449) It was confirmed the facades of 75 and 77 London Street would be repaired accordingly, as part of the works undertaken.

No details of any internal alterations to the ground floor of the buildings to facilitate the conversion to three flats have been provided and the submitted Heritage Briefing Note does not explain the significance of the internals of this part of the building. As such comments are not provided on this element of the proposals, but the strong presumption is that original fabric of the buildings should be retained and incorporated as part of the proposed conversion

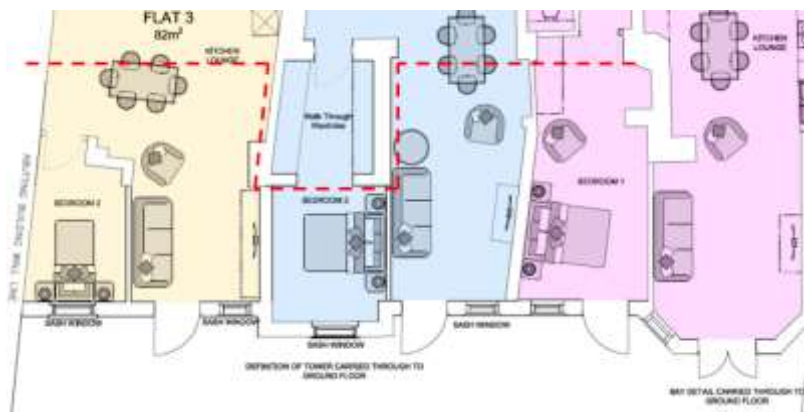
- Please see attached (Heritage Statement - 75-77 London Street - Rev00) Noting:

"Internally:

The interior of the existing building is of a poor quality at ground floor level and subject to many modern interventions although some of the original room forms at the front can still be read. There will be no loss of historic detailing as part of the works and the new residential accommodation on the ground floor will be fitted out in a style to suit the Georgian period architecture of the building."

- As detailed on (REV G - PART 1 - LISTED BUILDING PROPOSAL - EXISTING & PROPOSED PLAN & ELEVATION) the existing fabric of the ground floor is to be retained to the greatest degree possible. Where existing walls are present, the proposal has been designed to integrate. The ground floor extension extends past the historic fabric of Listed 75-77, shown below in red dashed line, highlighting the historic fabric of the tower, which continues to the roof.

Even past this point existing walls are retained, resulting in a layout that is heavily influenced by the placement of historic fabric, even if potentially more recent in formation.



- The ground floor of 75-77 London Street has been stripped out redecorated and refitted many times over the years to cater for the many attempted business ventures. The current Ground Floor interior comprises a very large commercial kitchen to the rear, Toilets, Access to flats above, storage, and main entrance Foyer leading to the existing rear hall.

Although more modern in fit-out it is proposed to largely retain the main entrance Foyer as it currently exists. Providing access to Flats 1 & 2. Access to the flats above remains unchanged. Toilets, which are more recent, will be stripped to form part of Flat 1.

It should be noted the area proposed to be the master bedroom of flat 3 is currently in a state of ruin, filled with rubble. An alley with leaking lean-to roof currently abuts Building No79, this is proposed to form the lobby for Flat 3.

It would be a great benefit to the development, if as part of the conversion, historic features were uncovered. In this eventuality, every effort would be made to integrate and retain these features.

With regard to the proposed new build element of the development to the rear of the site and as advised at the meeting held on 10th September 2021 the residential mews layout of two narrow separate blocks is considered suitable for this site given its long and narrow shape (albeit potential overlooking impacts, both between the two buildings and to adjacent sites will need to be carefully considered). This approach is reflective of the layout of other similar residential developments to the rear of London Street and furthermore is considered more reflective of the former character of this part of the conservation area which historic OS maps indicate was of modest rear outbuildings which were ancillary to the larger and grander London Street frontage buildings.

- Since the meeting held on 10th September 2021 a site survey and daylight survey have been conducted addressing potential overlooking and lighting considerations. As a result, the proposed flats have been revised, ensuring overlooking both between the flats and vantages towards the surroundings are respected.

The incorporation of the third floor of accommodation within the roof space with dormer projections is considered to further soften the mass of the development. The proposed scale combined with the layout including the central gap between the two proposed buildings would allow views of the rear elevations of the London Street frontage buildings with proposed 'garden areas' presented to East Street. Historic England consider opening up of these views to be a significant enhancement to the character and appearance of this part of the conservation area and street-scene where many other modern developments have obscured such views and entirely removed green spaces.

- We have enjoyed working with Historic England to further reveal the significance of this heritage asset. Taking the opportunity to also bring valuable green space to the heart of Reading.

The set back of the proposed two new build blocks from East Street is also welcomed which combined with the proposed scale of development is considered to sit appropriately within the prevailing scale of the East Street street-scene. It is disappointing that just over half the site frontage to East Street is taken up by a private car park, however it is acknowledged that this land is outside of the Applicant's ownership and control. The submitted design pack does indicate landscape planting to the frontage and area behind the car park and provision of central courtyard communal garden areas; the principle of which is welcomed and is considered sufficient in size for a development of the scale proposed. The site is located within an area identified as having low tree canopy cover and opportunities for soft landscaping are required to be maximized, including tree planting to the site frontage to East Street and site as a whole.

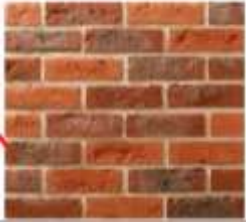
- The scale and massing of the development has been revised a number of times. Sections running through the site and street scenes gave context to the surroundings, enabled Historic England to best advise on massing and proportion in relation to the historic asset.

Little detail of the detailed design of the proposed new build rear building is provided within the pre-application design pack. In terms of materials, it is considered that red brick should be the primary finish for the new buildings and that any development should pick up on the design characteristics of the frontage buildings, such as slim profile Georgian windows, sills and gauged brick header lintel detailing and slate roofs.

Materials for the proposed flats includes:

- Red brick for the primary finish for the new buildings
- Georgian windows, sills and gauged brick header lintel detailing to match 75-77 London street

Aldwick Blend brick - Traditional thrown / stock / soft mud brick that is red in colour with a light texture.

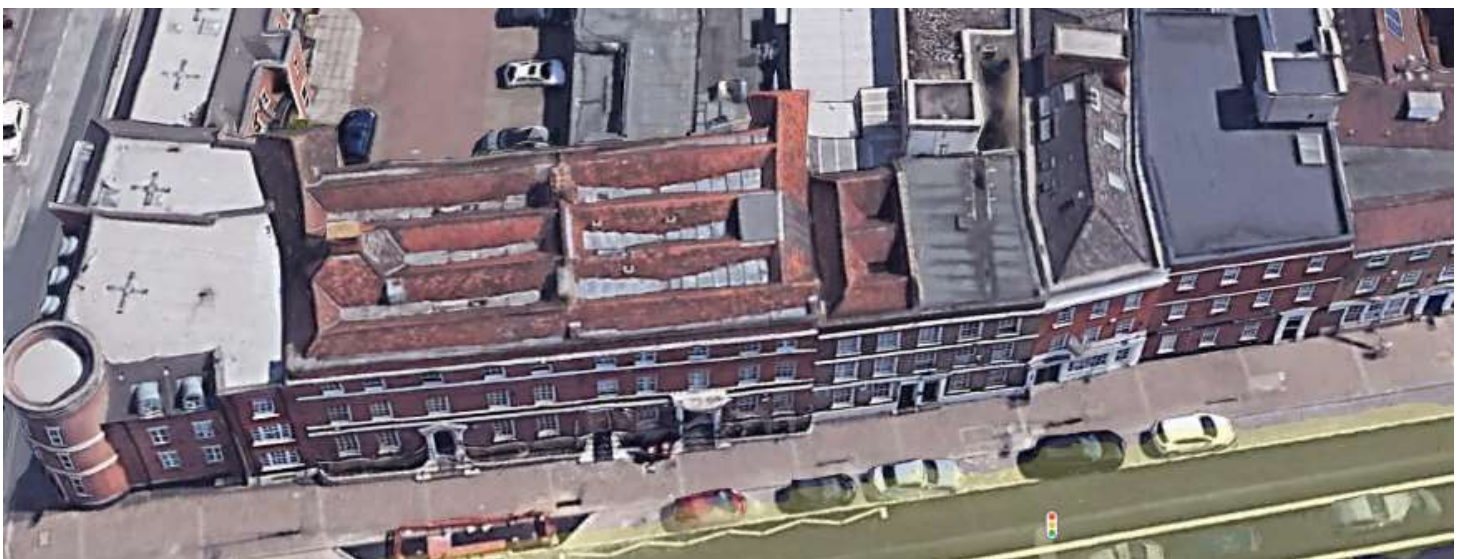


As for the roof, we intend to match the existing 75-77 London street using a heritage clay plain roof tile. Details of roof and brick selection below.

Heritage Clay Plain Roof Tile - Birchwood Mix

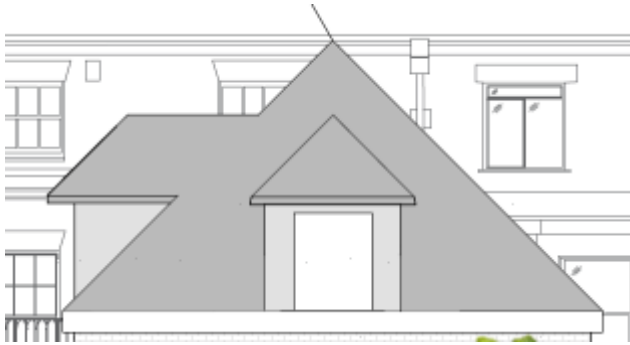


See 75-77 London street frontage below, clay tile being predominant.



Attention should be paid to window proportions, and it is expected should reduce to upper floors which is also reflected in the appearance of the existing frontage buildings. Dormer roof projections are also indicated – the scale of these projections should be kept to a minimum such as not to dominate the roof space and their design should be carefully handled using traditional materials (slate-hanging, leaded cheeks etc).

- Window fenestration to closely match existing, reducing on 1st floor.
- Dormer windows to roof reduced in scale from previous proposal, below on left. Now utilizing Leaded cheeks.



“full details of the design and appearance of the proposals have not been provided at this stage and given the heritage sensitivities of the site and surrounding area detailed design will be key in full assessment of the design and heritage matters of the proposed development. Therefore, whilst there is no objection to the principle of what is proposed detailed plans and a full heritage assessment would be required to fully inform a formal assessment of the proposal.”

- Our proposals now include complete plans for proposed flats.
- Heritage assessment included – See (640 Heritage statement)

“implementation and completion of the repair and restoration work to the frontage buildings prior to occupation of the new build development to the rear by way of a section 106 obligation. Therefore, detailed schedules of both internal and external works to the London Street frontage buildings should be provided upfront with any application for planning permission and listed building consent to ensure this works can be fully assessed at application stage and, if considered acceptable, secured by way of a section 106 agreement”

It is proposed, inline with the included Condition report relating to 75-77 London Street Reading, that remedial work be undertaken to the London Street frontage. Detailed report to follow.

Notwithstanding the above, please note that the loss of the leisure use of the site as detailed above in the principal section of this letter would also still require justification in the context of Policy RL6 separate to the heritage considerations of the loss of the hall building.

In Relation to RL6 The Local Plan states that the loss of a sport/recreation/ leisure facility will not be permitted unless there is:

a) no need for this type of facility in this area; or

b) the function of the facility would be adequately fulfilled by an existing facility, where that facility would be at least as accessible to the same catchment.

Since changing from a night club to private function venue, business had been steadily declining due to competition from other local venues with hotel accommodation & plentiful parking. The other venues also benefit from less restrictive planning requirements. It should also be noted many of the office buildings surrounding the premises have been converted to flats which further restricts this building for functions & entertainment due to potential noise & disturbance.

In 2019 the venue was making a large loss & therefore the family owners had no choice but to close the venue & put the business into receivership. Owing to the sheer size of the rear extension to the original Listed building as an entertainment venue, it is very limited in alternative uses.

The hall has been shut over the last 12 months, and it being empty threatens the older part of the building to the front in terms of fabric investment. An empty building does not make a positive contribution to either the Listed Building itself nor to its setting. It cannot compete with the large hotels with regards to functions particularly due to parking and noise requirements so it is no longer fit for purpose. It is poorly insulated at present from both a thermal and sound perspective. The rear portion is also of poor aesthetic quality and in a poor condition needing extensive repairs to the roof. There are no funds to repair the building because it has no purpose.

See included Valuation Report.

Amenity Matters

Policy CC8 (Safeguarding Amenity) seeks that the residential amenity of future and existing occupiers is protected. Policy CR6 (Living in Central Reading) seeks that new residential development in the town center demonstrates how future occupiers will be protected from noise, disturbances and adverse air quality impacts.

See Included: Noise Survey & Air Quality Report

Future Occupiers

Floor plans of the proposed development have not been provided and as such it is not possible to comment on standard of accommodation units to be provided for future occupiers. Policy H5 (Standards for New Housing) seeks that all new residential units should adhere to the nationally described space standards, whilst the policy sets out that such standards are not strictly sought for town center developments, it is strongly recommended that all developments achieve these standards. All habitable rooms should be served by a window to provide suitable outlook and daylighting.

Flat plans provided showing internal areas. Space standards exceeded across the board.

The new building block to rear would also be required to demonstrate that all units would be accessible

and adaptable in line with M4(2) of building regulations.

Designed to Accessibility standards, with examples of 1.5m turning circles in bathrooms shown.

I note the close relationship of the two proposed new build rear blocks which would be set 8m apart, albeit floor plans are not provided so details of window positions are not known. Whilst Policy CC8 seeks a back to back relationship of 20m between habitable windows to prevent overlooking and loss of privacy it is acknowledged that such relationships can be difficult to achieve in higher density town centre locations and that mews style developments also do typically have close relationships between buildings. Nonetheless 8m represents insufficient separation and raises concerns about overlooking within the proposed development. Opportunities to increase this separation should be explored whilst careful window placement will also be required to address overlooking and privacy concerns.

Options for habitable room placement and window positioning have been considered. It was decided best to keep these rooms facing inward to the site, as to not create new privacy concerns with the surrounding buildings. The habitable windows will still be Georgian style sash windows, set back from the wall face, creating space for vertically integrated fixed privacy louvers. When viewed from the site frontage and when walking down the central path formed between the two new flats, these louvers will appear to emulate the vertical sash bars present on the Georgian style sash windows; while providing privacy between the habitable rooms. This design strategy was devised with consideration to comment:

“Given the proposed layout of the development and close relationship to adjacent sites it is essential to ensure that windows do not directly face or ‘borrow outlook’ from the adjacent sites which would not be considered acceptable.”

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas to demonstrate that future occupiers would not be subject to unacceptable internal noise levels. The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

See Included:

- Noise Survey

It may be possible though clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Bedrooms are placed towards the center of the site, away from the car parks to either side and the flats are set well back from East Street. Bathrooms and living space face the noisier elevations.

Air Quality

The proposed development is located within an air quality management area and would introduce new sensitive receptors (residential occupiers) to the area. An air quality assessment and/or mitigation measures would be required to accompany any future planning application.

See Included:

- Air Quality Report

Bin storage – pest proofing

There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. Developers should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin.

A dedicated bin enclosure has been proposed to serve the site, ensuring bins can be stored in an orderly and hygienic manner.

Any future application or request for pre-application advice would also be required to demonstrate that the proposed development would not adversely affect daylight receipt to the closest windows of the flats to Compass House to the north or those rear-facing windows of the flats to the upper floors of no. 79 London Street. A daylight/sunlight assessment would be required to evidence this.

Light assessment included with submission.

In terms of overlooking impacts, I note the close relationship of the southernmost block of the proposals

with the rear flat windows of no. 79 London Street. The proposed site plan appears to indicate a back to back separation of 9.2m between facing windows which again raises concerns about overlooking and loss of privacy impacts. Opportunities to increase this separation should be explored and window placement considered carefully to mitigation any privacy impacts.

Despite the light assessment included with submission demonstrating lighting parameters are not breached. We have become aware the models do not accurately represent the upper floors of 79 London street, which are additionally set back, further reducing impact for lighting loss. A site survey has been conducted to address this concern and accurate details of the distance between the upper floors of 79 London St and the proposed flats have now been provided. Windows to the rear of Flat 2 which face towards 79 London St are a smaller size and frosted. Current distance from 79 London St to the back of Flat 2 is **10,738mm**.

In overall terms, it is not considered that the proposals would result any unacceptable intensification of use of the site in providing 12 dwellings in place of the private function venue use of the site. The proposed development includes provision of 7 parking spaces towards the East Street frontage. The existing site contains a similar number of spaces in a similar location. The number of spaces proposed, and their siting is not considered to adversely impact on adjacent occupiers in terms of any additional noise and disturbance impacts.

Other options for site use, including terrace houses have been explored. The current proposal maximizes green space and creates a superior view towards the historic asset.

Construction/Demolition Impacts

Details of mitigation of noise and dust impacts of the construction and demolition phases of the development would be required to be provided in the form of a construction method statement.

See Included:

- Noise Survey & Air Quality Report

Natural Environment

Policy CC7 (Design and the Public Realm) seeks to ensure that development is of high design quality and includes landscaping, Policy EN14 (Trees, Hedges and Woodlands) seeks to protect existing trees and vegetation from damage and extend the Borough's vegetation cover, whilst Policy EN12 (Biodiversity and the Green Network) seeks that all development should provide a net gain for biodiversity.

There is currently no green space on site. A detailed landscaping plan is to follow.

There are no existing trees or vegetation on or directly adjacent to the application site which is entirely covered in buildings and hardstanding. As discussed above the provision of garden spaces within the site is welcomed and opportunities for tree planting and other soft landscaping within the development should be maximised and a scheme of landscaping principles would be required to accompany any future planning application. Opportunities for non-ground-based landscaping such as green roofs or green walls should also be considered.

Landscaping principles to follow.

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of the buildings or trees to be removed are thoroughly searched for bats and signs of bats; this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats, then further surveys will not be required. However, if bats are found or if the building and/or trees have features suitable for use by roosting bats, further emergence and or dawn surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid- October) may need to be carried-out to confirm the presence or absence of bats and if bats are present to establish the characterisation of the roost and mitigation requirements.

Bat assessment included with submission.

Sustainability

Policy H5c requires that all major new building housing is built to achieve zero carbon homes standards. Or if unachievable, to achieve a minimum 35% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations and then a financial contribution would be secured from the Applicant by way of a section 106 legal agreement to offset remaining carbon emissions to zero. This would apply to the 12 new building units to the rear of the site. Please see the adopted Sustainable Design and Construction SPD 2019 for further information and what details would be required to be provided at application stage (<https://images.reading.gov.uk/2019/12/Sustainable-Design-and-Construction-SPD-Adopted-December-19.pdf>).

Minimum 35% achieved in Energy Statement / Sustainability Statement to follow.

Policy H5b also requires that all new building housing is built to the higher water efficiency standard under Regulation 36(3) of Building Regulations and this should also be demonstrated as part of a sustainability statement.

Water efficient fixtures such as water-saving taps and showers will be selected. Energy Statement / Sustainability Statement to follow.

Under Policy CC2 (Sustainable Design and Construction) the three flats to be formed by conversion works to the London Street frontage buildings would be required to demonstrate compliance with BREEAM standard of Very Good.

Proposed 19% improvement in the dwelling emission rate for flats proposed to listed building ground floor, in Energy Statement / Sustainability Statement to follow.

Policy CC3 (Adaptation to Climate Change) also requires that the all developments demonstrate how they have been designed to incorporate measures to adapt to climate change and details of this should be included with any future planning application. The Councils adopted Sustainable Design and Construction Supplementary Planning Document contains further information of such measures that could be incorporated: [https://images.reading.gov.uk/2019/12/Sustainable-Design-and-Construction- SPD-Adopted-December-19.pdf](https://images.reading.gov.uk/2019/12/Sustainable-Design-and-Construction-SPD-Adopted-December-19.pdf)

Proposals in Energy Statement / Sustainability Statement to follow.

Transport

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.

- Transport Statement with CMS included with submission.
- Provision for bicycle parking shown on Site plan.
- Provision for a single Electric Vehicle (EV) charging point of 7kw proposed to front parking.

Section 106 Obligations

In addition to the affordable housing s106 obligations outlined in the principle section of this letter a development of the scale proposed would also be required to contribute towards employment skills and training within the Borough in accordance with Policy CC9 (Securing Infrastructure) and adopted Employment Skills and Training SPD (2011). This would be in the form of an Employment Skills and Training Plan or equivalent financial contribution to be secured under a s106 agreement. Please see the SPD for further details: <https://images.reading.gov.uk/2019/12/Employment-Skills-And-Training-Supplementary-Planning-DocumentApr13.pdf>

The applicant intends to submit a viability report to show the 30% contribution will not be viable. The applicant intends to pay the council for the preparation of the 106 legal agreement. Currently waiting for viability & Affordability.

Community Infrastructure Levy (CIL)

The Council's charging schedule sets out that all new residential development is liable for CIL. The levy is subject to indexations but is currently at £156.24 per square metre.

Noted.