



Town Planning Bureau

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Dear Sir / Madam

Planning, Design and Access Statement

Date: 16th August 2020

RE: APPLICATION FOR THE CHANGE OF USE AND CONVERSION OF FIRST FLOOR OFFICES TO CREATE 4NO. SELF CONTAINED FLATS.

Our ref: URB-483c-ST2

SITE: 1 STATION ROAD/22 FRIAR STREET, READING RG1 1LG.

This letter is submitted in support of a planning application for the above described development at the above site.

e-mail
info@tpbureau.co.uk

The application comprises:

1. Application form;
2. Site location plan;
3. Existing drawings;
4. Proposed drawings;
5. Air Quality Assessment;
6. Noise Exposure Assessment; and
7. Affordable Housing Viability Assessment.

web
www.tpbureau.co.uk

We should be grateful if you would give full consideration to the matters set out below.

1. Introduction

This application is for the use of the first floor as four self-contained residential flats and is on behalf of TE Station Road Ltd, who are the owners of the property.

The proposals set out herewith are linked to other proposals on other floors within the building, which are subject to different planning consents and pending applications. The proposals set out herewith will therefore benefit from some of the features and services of the other proposals, which is set out later in this statement.

2. The Site

The site comprises a four-storey building at the junction of Station Road and Friar Street, fronting onto Station Road but with a small return frontage on Friar Street.

This application relates to the first floor of the building.

The site is located on a major pedestrian route, with the surrounding area comprising a mix of town centre uses including shops, drinking establishments, banks, coffee shops, betting shops, hotels and other professional services.



RTPI

mediation of space · making of place

Members of the Royal Town Planning institute

The site is located within the Reading Central Area, the Station/River Major Opportunity Area, Primary Shopping Area (primary frontage) and Office Core Area. The site is not a listed building nor is it located within a conservation area, but is locally listed.



External image of the site (Google Street View)

3. Planning History

The below table summarises the relevant planning history for the site. The site benefits from Prior Notification Certificates (PNCs) for the change of use of the first, second and third floors from office to residential use. Two planning applications are currently pending, including fenestration alterations associated with the existing PNCs and a second and third storey extension for the provision of additional residential units.

In addition, a further PNC application is pending (app ref: 200863), for the change of use of the second and third floors from office to residential to creation 7 self-contained flats.

As well as those applications listed below, associated discharge of conditions applications are pending or have been decided.

APP ref	Description	Decision	Date	Applicant
901187	Alterations, renovation and extension to existing building	Approved	12/09/1990	Nationwide
011000	Proposed alteration of shopfronts to provide new disabled access to suit internal alterations	Approved	22/11/2001	Nationwide
180139	Change of use 1st, 2nd and 3rd floors of building from Class B1(a) (offices) to C3	PNC Issued	21/03/2018	Nationwide

	(dwelling houses) to comprise 11 dwellings. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.			
182109	Change of use 1st, 2nd and 3rd floors of building from Class B1(a) (offices) to C3 (dwelling houses) to comprise 15 dwellings. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	PNC Issued	28/01/2019	TE Station Road Ltd
191466	Change of use of 1st, 2nd and 3rd floors from Class B1(a) (offices) to C3 (dwelling houses) to comprise 12 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	PNC Issued	31/10/2019	TE Station Road Ltd
191589	Installation of additional windows into rear (west-facing) elevation and erection of new dormer window to front roof slope (linked to Prior Approval Application 191446).	Pending	-	TE Station Road Ltd
191588	Erection of second and third floor rear extension (for residential purposes to create 3 additional dwellings) to existing building (linked to Prior Approval application 191446).	Pending	-	TE Station Road Ltd
200343	Change of use of ground floor from A2 Financial & Professional Services to mixed use A3/A5 Restaurant/Take Away use and associated works including external ventilation louvre to Station Road elevation.	Approved	25/05/2020	TE Station Road Ltd
200863	Change of use of 2nd and 3rd floors from Class B1(a) (offices) to C3 (dwelling houses) to comprise 7 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Pending	-	TE Station Road Ltd

4. The Proposals

This application proposes the change of use of the first floor of the building from office use to residential (C3) use to create four self contained flats, of the following specifications:

- Flat 1: 67 sq m 2-bedroom flat with external terrace amenity space;
- Flat 2: 50 sq m 1-bedroom flat;
- Flat 3: 39 sq m 1-bedroom flat; and
- Flat 4: 51 sq m 2-bedroom flat.

Each flat will comprise a bathroom, kitchen/living/dining area and bedroom(s). Direct access to the flats would be via the existing stairway from the entrance lobby on the Station Road frontage. There would be no external alterations to the building as part of this application.

The proposals have been designed to mesh coherently with current pending proposals for the conversion of the second and third floors of the building, as well as the proposed extension of the third floor. The proposals herewith will therefore be able to utilise the

proposed servicing arrangements and basement bicycle storage, providing 28 bicycle spaces.

5. Planning Policy

In preparing the development proposals of this application, consideration has been given to the following relevant planning policy framework:

- National Planning Policy Framework (2019);
- Reading Borough Local Plan (2019):
 - CC1 Presumption in favour of sustainable development
 - CC2 Sustainable design and construction
 - CC3 Adaptation to climate change
 - CC6 Accessibility and the intensity of development
 - CC8 Safeguarding amenity
 - EN2 Areas of archaeological significance
 - EN15 Air quality
 - EN16 Pollution and water resources
 - EM3 Loss of employment land
 - H1 Provision of housing
 - H2 Density and mix
 - H3 Affordable housing
 - H8 Residential conversions
 - H10 Private and communal outdoor space
 - TR3 Access, traffic and highway related matters
 - TR5 Car and cycle parking and electric vehicle charging
- Reading Borough Supplementary Planning Documents (SPD):
 - Affordable Housing (2013)
 - Revised Parking Standards and Design (2011)
 - Sustainable Design and Construction (2019)

6. Planning Considerations

The application site is subject to the following site-specific planning policy designations:

- Air Quality Management Area;
- Area of Archaeological Potential;
- Primary Shopping Area;
- Office Core;
- Central Core;
- Primary Frontage in Central Reading (Proposed);
- Classified Highway Network - Friar Street;
- Site Identified for Development or Change; and
- Major Opportunity Area.

The following are considered to be the principal issues relating to the proposals and are considered in turn below:

- Principle of Development;
- Amenity;
- Sustainability;
- Transport and Parking;
- Affordable Housing; and
- Heritage Impact.

Principle of Development

Loss of Employment Floorspace

The first floor of the property is currently in office (B1a) use. The site is not within the Core Employment Area, however **Policy EM3** of the Local Plan sets out considerations in the case of a loss of employment land. Of relevance to the consideration of the proposals against this policy is the existence of a PNC for the conversion of the first floor from office use to residential. This represents the fallback position that can be implemented and would result in the loss of office floorspace in any event. In addition, the first floor office space has become available for development, being surplus to the requirements of the then Nationwide Building Society on the ground floor of the building, emphasised by the loss of this occupier and the intended conversion of the ground floor (app ref: 200343).

The thrust of **Policy CC1** of the Local Plan, and that of the NPPF, is a presumption in favour of sustainable development and the role of material considerations in determining planning applications. The presence of the existing PNC and permitted development rights for the change of use represents a material consideration for the determination of this application and should be taken into account in the context of **Policy EM3**.

Delivery of Housing

The Local Plan highlights the pressing need for additional housing in Reading with **Policy H1** identifying a shortfall against need, not able to be met within the Borough. The Local Plan emphasises a focus on housing provision within the town centre, with **Policy H2** and its supporting text recognising the role of town centre sites in delivery of higher density development and, accordingly, smaller unit sizes.

The proposals will deliver four additional residential units and a mix of 1-bed and 2-bed sizes. This will assist in the delivery of much needed housing within the Borough and is in accordance with relevant policies.

Amenity

Policy CC8 of the Local Plan sets out multiple considerations for the potential impact of development on the living environment and amenity of both existing and future occupiers. **Policy EN16** reiterates the requirement to ensure sensitive developments are not exposed to high-levels of pollution, including noise and air pollution. **Policy H8** relates specifically to conversions of buildings to residential use, seeking to protect the amenity of the surrounding area and for future occupiers.

Neighbouring Occupiers

The proposals involve the internal alterations of the existing building at first floor, with no external alterations to the existing building. In the absence of external changes, the proposals will not have any impact with regard to daylight/sunlight, overbearing or loss of outlook of any neighbouring or surrounding occupiers.

Given the surrounding uses in the immediate vicinity of the site and the wide spacing of Station Road and Friar Street, the introduction of residential uses and habitable rooms will not create and overlooking impacts for existing neighbouring occupiers or in the surrounding area.

Future Occupiers

The proposals will result in a reduction in one residential flat from the fallback position of the issued PNC. Whilst this will lead to fewer properties, this will enable provision of larger units, which fully accord with the Nationally Described Space Standards as reflected under **Policy H5** of the Local Plan. The proposals will also allow for outdoor

private amenity space to be provided for flat no.1. This will result in an enhanced environment for future occupiers and is in accordance with policy.

Noise

A Noise Exposure Assessment is submitted with this application, which assesses the existing external noise levels and the potential impact on future occupiers of the proposals. The assessment has been carried out in accordance with relevant British Standards and concludes that acceptable internal noise levels can be achieved, utilising recommended mitigation through glazing and ventilation specification.

Air Quality

Policy EN15 of the Local Plan requires applications for sensitive uses, such as residential, introduced into an Air Quality Management Area to mitigate for any detrimental impacts. This application is accompanied by an Air Quality Assessment, which has assessed the baseline conditions and potential impacts on future occupiers of the proposals, particularly that of traffic emissions from Station Road and Friar Street. This concludes that pollution levels are below relevant Air Quality Objectives and suitable for the proposed use. Owing to the car-free nature of the development, the air quality impacts arising from the proposals are identified as not significant. The proposals therefore comply with relevant planning policy in this regard.

Sustainability

Policy CC2 of the Local Plan requires new developments to be of sustainable design and construction and to take account of the effects of climate change. The policy specifically requires all minor conversions to residential use to meet BREEAM 'Very Good' standard as a minimum. **Policy CC3** sets out further examples of how developments can incorporate measures to adapt to climate change, which will be sought.

- The proposals will comply with the BREEAM 'Very Good' Standards as a minimum in accordance with Policy CC2.

Utilising an existing building for refurbishment to alternative uses limits the scope of climate change adaptation measures that can be incorporated. However, the design of the proposals has taken advantage of existing attributes of the building, such as the orientation of habitable rooms to utilise facades with southerly exposure for natural light and heating where possible, which coordinates with window proposals as part of other applications discussed above. The conversion of the premises will also incorporate modern insulation materials to assist in regulation of the internal climate and reduce the energy usage.

Transport and Parking

Policy TR3 of the Local Plan requires development proposals to consider their effect on traffic safety, congestion and the environment. Friar Street is designated as a Classified Highway Network and TR3 requires proposals for new dwellings to incorporate off-street servicing arrangements.

The existing premises do not have off-street servicing capabilities. Appropriate internal refuse storage will be provided for within each flat. Domestic waste will then be removed by kerbside collection in line with existing arrangements in the vicinity. This is not considered to give rise to highways safety issues.

Policy TR5 of the Local Plan requires development proposals to provide car and cycle parking that is appropriate to the accessibility to sustainable transport facilities. The Parking Standards and Design SPD establishes a parking requirements of 0.5 spaces per 1/2-bed flat within the identified Zone 1 for the Central Core Area, which the site is within. The SPD states that where parking provision is proposed below these standards, it needs to be demonstrated that there would be no detriment to highway safety.

The site is extremely sustainably located with easy walking access to Reading Railway Station and bus interchange as well as town centre uses such as shops, restaurants, cafes and other facilities. The application therefore proposes a car-free development to reflect the sustainable location. This approach is in line with the accepted position on car-free proposals in the PNCs, where it was acknowledged that, owing to the town centre location and local parking restrictions, a car-free development of this nature would not have a detrimental impact on highway safety. The proposals are therefore considered to comply with relevant planning policies.

Affordable Housing

Policy H3 of the Local Plan sets out the requirements for on-site provision and financial contribution towards affordable housing from residential developments of differing yields. Development proposals that fall short of the requirements must provide a viability assessment as justification for the reduced proposed contribution or provision. At four proposed dwellings, the policy requirement is for a financial contribution equivalent to 10% of units to be provided as affordable housing elsewhere in the borough.

As identified, the site benefits from the existence of a PNC for conversion of the first floor from offices to residential (5 flats), which represents the fallback position for the site. Under implementation of the PNC, the scheme would not be liable for affordable housing contributions and would yield a greater number of market units. This is a key consideration with regard to the proposals herewith and the viability of the scheme.

This application is accompanied by a high-level viability appraisal, which considers the building as a whole, and related planning proposals/consents, as the site is within single ownership. This concludes that the combined proposals are unable to meet the full financial contribution specified in policy due to viability reasons. The approach taken is in accordance with the Affordable Housing SPD and contributions will be secured through a Section 106 mechanism. As such, the proposals will comply with the process and provisions of relevant planning policy.

Heritage Impact

The site falls within a designated Area of Archaeological Potential. **Policy EN2** requires applications to identify and evaluate archaeological significance and any impacts of proposals, with a programme for documentation and preservation where relevant. The proposals are for internal alterations only and will not have any impact on the archaeological potential of the site.

7. Summary and Conclusions

- This application is for the conversion of the first floor office to create four residential flats.
- The building already benefits from existing PNCs for office to residential conversion, including 5 flats at first floor level. This represents the fallback position for the site.
- The proposals will comply with relevant planning policy, providing much needed residential development in a sustainable location, creating a suitable environment and amenity for neighbouring and future occupiers.
- The application is accompanied by a viability appraisal to justify the approach to affordable housing contributions, which will be secured through further negotiation with the Council and Section 106 mechanisms.
- The proposals are considered acceptable in planning terms and should be granted planning permission accordingly.

Should you wish to discuss this application, please do not hesitate to contact the writer.

Yours faithfully

Paul S Bottomley BA (Hons) MA MRTPI
Town Planning Bureau

Enc.