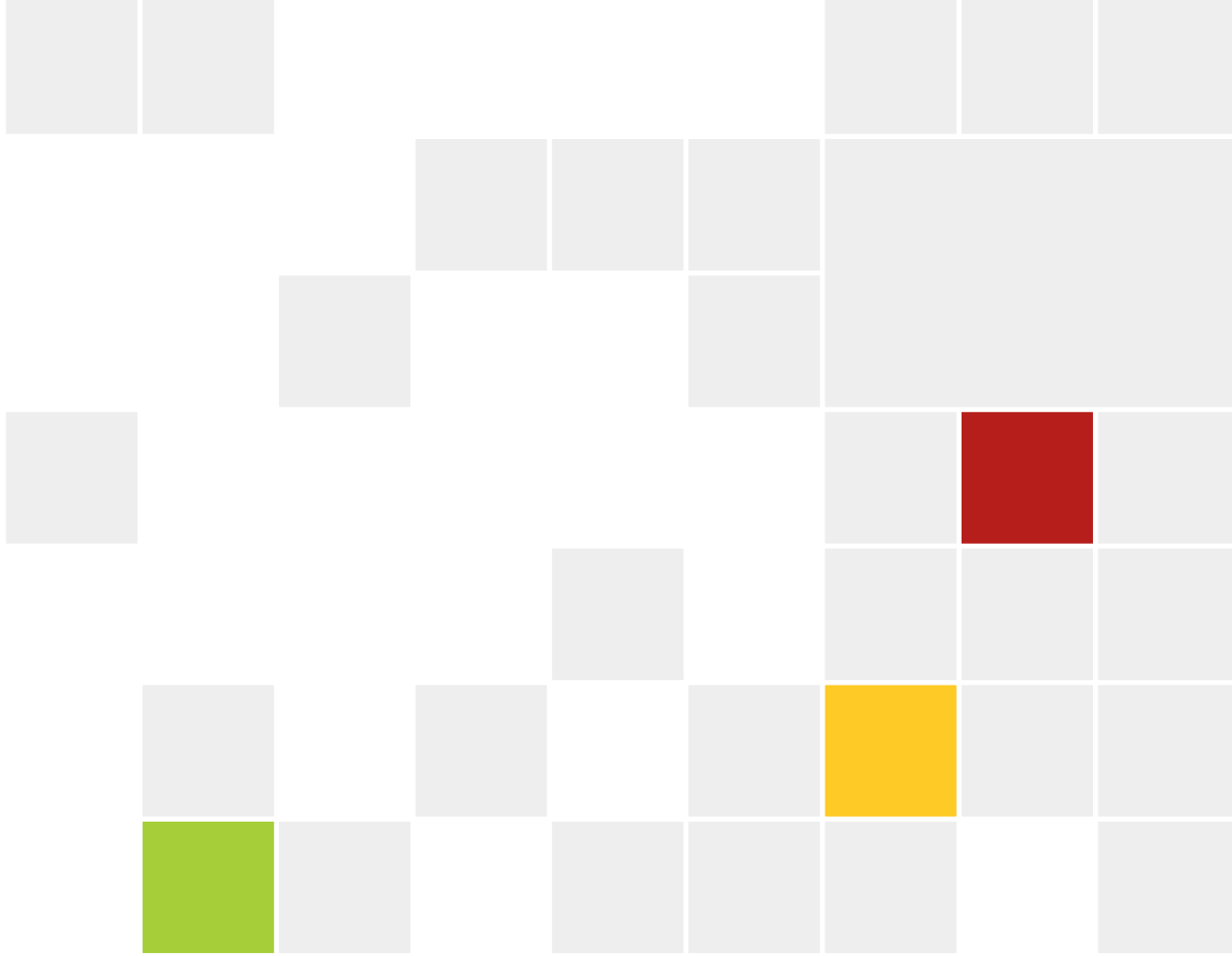
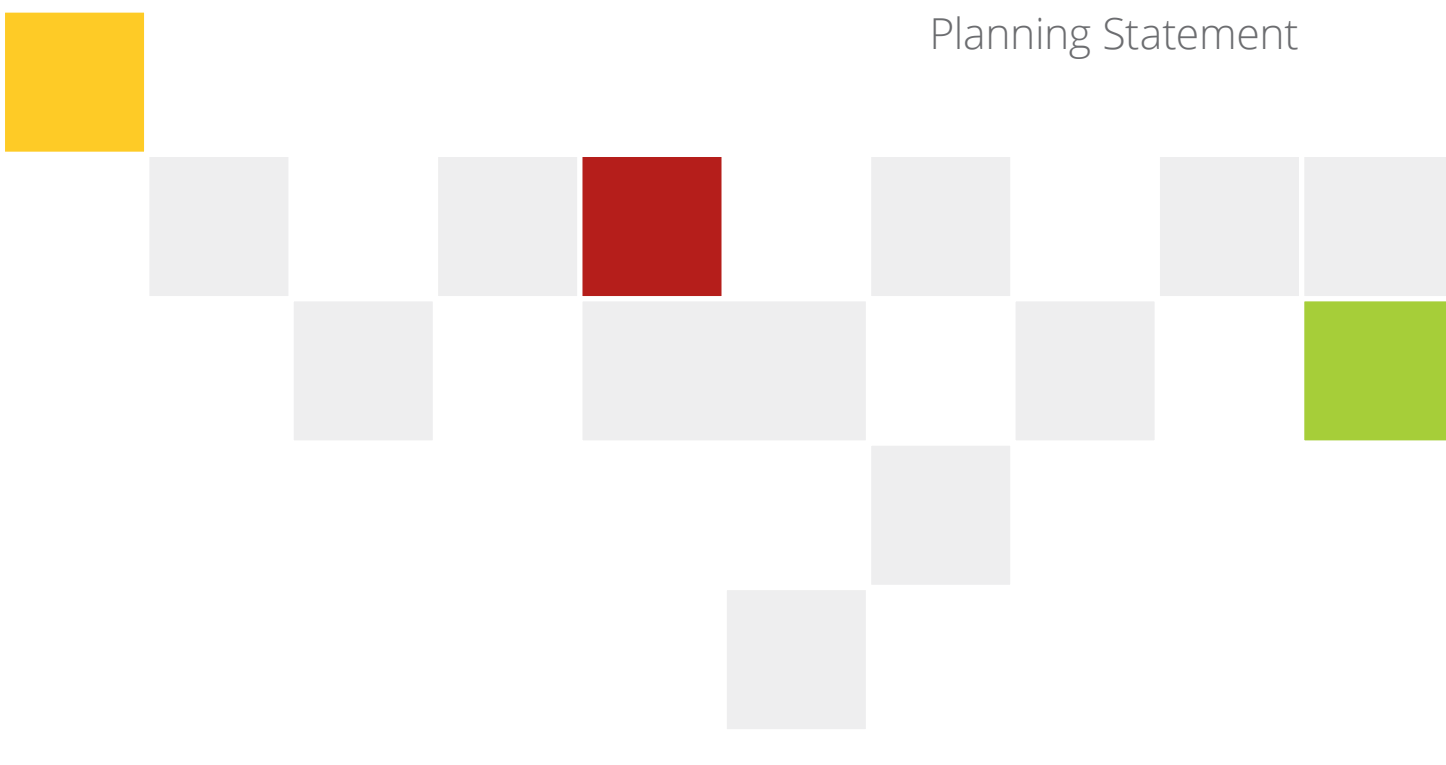


A decorative graphic consisting of a grid of squares. Most squares are light gray, but there are a few colored squares: a red square, a yellow square, and a green square. The squares are arranged in a pattern that is roughly rectangular but has some missing squares, creating a fragmented look.

108 London Street and Prince Regent House, Reading

Planning Statement

A decorative graphic consisting of a grid of squares. Most squares are light gray, but there are a few colored squares: a yellow square, a red square, and a green square. The squares are arranged in a pattern that is roughly rectangular but has some missing squares, creating a fragmented look.

Boyer

Report Control

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1. INTRODUCTION

1.1 This Planning Statement is submitted on behalf of Aspire 108 London Street Ltd ('the Applicant') to Reading Borough Council (RBC), in support of a planning application relating to land at 108 London Street and Prince Regent House, Reading ('the site').

1.2 The description of development is as follows:

"Planning and listed building consent for the conversion from office buildings to seven residential apartments with associated parking and refuse storage".

1.3 The planning application is accompanied by the following supporting documents:

Table 1: Drawings in support of the application

Drawing Number	Drawing Title
50514-7	Site Location Plan
50514-6	Site Block Plan
50514-1 Rev A	Existing Floor Plans Sheet 1 of 5
50514-2 Rev A	Proposed Floor Plans Sheet 2 of 5
50514-3 Rev A	Roof Plans and Elevations Sheet 3 of 3
50514-4 Rev A	Site Existing and Proposed Sections Sheet 4 of 5
50514-5 Rev A	Demolition Floor Plans Sheet 5 of 5

Table 2: Documents in support of the application

Document	Prepared by
Planning Statement	Boyer
CIL Forms	Boyer
Design and Access Statement	Building Plans By Design Ltd
Preliminary Ecological Appraisal	Southern Ecological Solutions
Sustainability Statement	Reduce Energy Ltd
Daylight and Sunlight Study	Right of Light Consulting
Heritage Statement	JP Heritage
Noise Impact Assessment	Paragon Acoustics

Vibration Impact Assessment	Paragon Acoustics
Transport Assessment	Motion

- 1.4 The Planning Statement deals specifically with the residential development proposal in the context of Government advice and the development plan. The relevant policy documents are assessed in Section 6 of this Statement.

Structure of the Planning Statement

- 1.5 This Planning Statement is structured as follows:

- **Section 2** sets out the context for the proposed development, including a description of the site and its surroundings;
- **Section 3** describes the planning history of the site and surrounding area;
- **Section 4** provides a description of the proposed development;
- **Section 5** provides an overview of national and local planning policy and guidance considered relevant to the determination of the application proposal;
- **Section 6** provides an assessment of the proposed development against the identified planning policy framework; and
- **Section 7** provides a summary of the application and conclusions.

2. SITE AND SURROUNDING CONTEXT

Site Description

- 2.1 The site currently comprises of two existing buildings known as 108 London Street and Prince Regent House, which are connected by a link extension. The site is located in central Reading, in the administrative district of Reading Borough.
- 2.2 108 London Street is a late 18th Century mid terrace townhouse and is the original building on the site with a three storey frontage on London Street. This building is connected by a link to a modern two storey extension located at the rear of the site called Prince Regent House.
- 2.3 108 London Street contains mainly cellular office space on the ground and upper two floors with Prince Regent House being predominantly open plan in nature. Prince Regent House is also currently in office use, although both buildings have been vacant for over a year. To the rear of Prince Regent House is a small surface car park which contains six car parking spaces. This is accessed from St Giles Close.
- 2.4 108 London Street is a Grade II Listed Building and the whole site lies within the Market Place/London Street Conservation Area.
- 2.5 The site is also located within an Air Quality Management Area (AQMA) and an area of Archaeological Potential as defined on RBC's Proposals Map.
- 2.6 The site is also located in Flood Zone 1 which carries the lowest risk of flooding.

Surrounding Area

- 2.7 The site lies in a predominantly built up urban area that contains a mixture of office, residential and retail buildings.
- 2.8 The site is situated in a sustainable location with accessible links to multiple forms of public transport. A bus stop is located outside of 108 London Street and serves a number of bus routes. The main Reading train station is located within 0.6 miles.
- 2.9 The Oracle Shopping Centre, which contains a wide variety of retail and leisure facilities, is approximately 0.3 miles away; again highlighting its sustainable location.

3. PLANNING HISTORY

- 3.1 This section summaries the planning history which is of relevance to the site and the surrounding area.

Application Site

- 3.2 Online planning history records from 1989 onwards indicate that there have not been any planning applications for the site. However, there are a number of applications that were submitted for the site that precede this date which are summarised below.

Table 3: Summary of Relevant Planning History for the Site

Reference Number	Proposal	Decision
1956/04570	Change of use from living accommodation to offices and living accommodation	Granted
1956/04575	Use of ground floor as offices use of 1 st and 2 nd floor as flats	Granted
1966/13528	Extension to ground floor office	Granted
1971/19321	Office accommodation	Granted
81/TP/1010	Alterations and extensions to existing building for office use with car parking	Refused
83/TP/0452	Demolition of existing two storey twentieth century addition at rear of main building and erection of new two storey building at rear with single storey link block to main building.	Granted
83/TP/0422	Demolition of existing two storey erection to rear of main building and erection of new two-storey at rear with single storey link block to main building.	Granted

Surrounding Area

102 London Street

- 3.3 In December 2000, a planning application was submitted (ref: 990662) for 102 London Street for a residential development of 6 x 1 bedroom and 7 x 2 bedroom apartments, situated around a courtyard. This application was granted planning permission in June 2001.

106 London Street

- 3.4 A prior approval notification application (ref: 130847) was submitted for the adjacent property at 106 London Street in June 2013, with the description of development as follows:

Change of use of building from Class B1(a) (offices) to C3 (dwellinghouses) to comprise 7 x 1 bedroom flats.

- 3.5 This application was approved in July 2013 and has subsequently been implemented.

112 London Street

- 3.6 An application for the demolition of the existing night club and erection of 10 new residential Class C3 apartments (5 x 1 bed and 5 x 2 bed) with courtyard garden, cycle and bin storage was submitted in October 2016 (ref: 161935). This application was refused on the grounds of poor design, sub-standard accommodation and living standards and the failure to comply with a number of policies.

- 3.7 Subsequently, an amended application (ref: 172213) for this site was submitted in December 2017. The description of development is as follows:

Demolition of existing building and erection of 2 x Class C3 residential apartment blocks comprising 6.No. flats.

- 3.8 This application was referred to Committee with the recommendation for refusal on similar grounds as outlined above. Consequently, the application was withdrawn.

4. PROPOSED DEVELOPMENT

4.1 The description of development is as follows:

“Planning and listed building consent for the conversion from office buildings to seven residential apartments with associated parking and refuse storage”.

4.2 The apartments range in size from 1-2 bedrooms and comprise of all apartments which helps to meet the needs of the local community. The proposed housing mix is set out in Table 4 below:

Table 4: Proposed Housing Mix

Dwelling Size	Number
1 Bedroom Flat	4
2 Bedroom Flat	3
Total	7

- 4.3 It is proposed to retain four of the existing car parking spaces for the proposed apartments which are situated to the rear of the existing buildings.
- 4.4 Access to the four apartments within Prince Regent House would be from St Giles Close and includes a safe pedestrian route to the rear entrance of the building.
- 4.5 The remaining three apartments within 108 London Street will utilise the existing access directly from London Street.
- 4.6 There are also two separate dedicated areas proposed for refuse and recycling storage. For Apartments 1, 2, 4 and 5, a secure refuse and recycling storage area is located at the rear of Prince Regent House in the southern portion of the car park. For Apartments 3, 6 and 7 located within 108 London Street, refuse and recycling storage will be located within the existing basement.
- 4.7 Twelve bicycle parking spaces will also be provided within the basement which will serve the apartments located within 108 London Street. Similarly, for the four apartments in Prince Regent House, two Sheffield Stands (accommodating four cycle parking spaces) will be located adjacent to the refuse storage area within the existing car park, which will provide adequate cycle parking for those four apartments.
- 4.8 The existing front exterior of 108 London Street consists of brick construction in Flemish bond with a stucco plinth, with a tiled hipped roof. The window openings on the front elevation consist of flat arch brick heads and 6 over six sash windows with slender glazing bars.

- 4.9 As 108 London Street is a Grade II Listed Building, the internal layout of the building has been remodelled in order to respect the historically important aspects of the building, whilst retaining as many of the original features as possible.
- 4.10 The proposed internal alterations to the ground floor of 108 London Street includes the blocking of a door near the front entrance to the building; the removal and reinstatement of one of the fire surrounds in the two rooms at the front of the building; the removal of a section of wall on the western side of the rear room of 108 London Street; and the removal of a partition in the existing hallway, with a new partition inserted.
- 4.11 Proposed alterations to the first floor of 108 London Street include the infilling of the door from the landing; the removal of the panelled partition and insertion of a partition to create a bathroom across the two rooms located at the front of the building; the creation of a new opening on the right side of the existing chimney breast in the rear part of the building; the infilling of the door on the landing; and the partial removal of the partition between the two rear rooms.
- 4.12 There would also be a number of alterations made to the existing second floor which include the removal of a partition wall and the creation of a new partition to create a bathroom between the rooms located at the front; the blocking up a doorway between the central room and the rear left room; and the partial removal of a partition between the two rear rooms.
- 4.13 As described within the Heritage Statement, these proposed alterations would have a minimal impact on the significant historic fabric of the building and therefore will not have an adverse harm on 108 London Street and will in fact ensure the long term preservation of the Listed Building.
- 4.14 Apartments 2 and 3 on the ground floor will also have access to their own external private courtyards which are located in the link area between the two existing buildings. A screen is provided within the courtyard to ensure that both the future residents of the development and the residents of the neighbouring properties are ensured suitable privacy.
- 4.15 Further details on the design of the proposed development can be found in the Design and Access Statement and the Heritage Statement which accompany this application.

Pre-Application Engagement

- 4.16 A pre-application meeting was held with Council officers on 30 November 2017. The meeting was attended by Matthew Burns (Senior Planning Officer), a Conservation Officer, as well as representatives from the applicant and members of the consultant team.
- 4.17 The meeting was held as part of pre-application discussions with the Council. This provided an opportunity for the Applicant to discuss an indicative layout with the Council and explain the proposed design rationale, which at the time included a second floor rear extension and conversion from offices to nine residential apartments.

4.18 A written pre-application response was subsequently received on 12 January 2018. The pertinent points from this response are summarised below:

- The principle of residential development on this site is acceptable and the loss of office accommodation to residential is in principle supported;
- Concerns were raised by the Conservation Officer in regards to the internal alterations of 108 London Street, which could adversely affect the character and architectural significance of the building. It is considered that a number of revisions would be required in terms of internal layout of apartments to overcome this;
- A concern was also raised in regards to outlook and privacy within the proposed development itself as well as the relationship between the proposed housing and the adjoining property at Alder House;
- No objections were raised to the internal alterations to the proposed 'modern' link and two storey building existing at the rear;
- Additional information would be required for an application in terms of daylighting, noise and vibration and disturbance;
- A scheme of nine apartments was expected to include an element of medium-sized family housing, and the inclusion of, as a minimum, 1 x 3 bed unit;
- It was accepted that future occupants will benefit from nearby parks and recreation facilities and therefore the lack of amenity space provided on site should not be a concern; and
- Details of the parking arrangements would need to be provided as part of the application.

4.19 In response to the points raised within the pre-application letter, some changes were made to the proposals including changes to the internal layout and the removal of the second floor rear extension.

4.20 Furthermore, the application submission includes relevant supporting information as requested as part of the pre-application discussions.

4.21 Engagement with the Conservation Officer has influenced the final design of the proposed development. Their comments have been taken into account within the accompanying Heritage Statement.

5. PLANNING POLICY CONTEXT

- 5.1 This section provides a summary of the relevant planning policy framework against which the planning application will be determined.
- 5.2 The relevant planning policy framework comprises the Core Strategy (2008, as altered in 2015), the Reading Central Area Action Plan (AAP) (2009) and the Sites and Detailed Policies Document (SDPD) (2012, altered 2015). Alongside this are several relevant Supplementary Planning Documents (SPD) which are detailed below.
- 5.3 The National Planning Policy Framework (2012) is also a relevant material consideration.

National Policy

National Planning Policy Framework (2012)

- 5.4 The National Planning Policy Framework (NPPF) provides the overarching planning policy framework against which all local plans and neighbourhood plans should be prepared and against which all planning applications are determined.
- 5.5 Paragraph 7 of the NPPF establishes that there *“are three dimensions to sustainable development: economic, social and environmental.”* These dimensions give rise to the need for the planning system to perform a number of roles:
- *“an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
 - *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*
 - *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy” (p.2).*
- 5.6 As detailed in Paragraph 14, at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as *“a golden thread running through both plan-making and decision-taking”* (p.4). NPPF Paragraph 14 sets out how the presumption in favour will apply to plan-making and decision-taking. As the development plan is already in place for RBC in the form of the adopted Core Strategy, Area Action Plan and adopted Site and Detailed Policies Document, it is the policy in the second part of NPPF paragraph 14 concerning the application of the presumption in favour to decision taking that is relevant. This advises that development that accords with the development plan should be approved *“without delay”*.

5.7 Paragraph 17 of the NPPF states that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These principles include that planning should (pp. 5-6):

- *“not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *take account of the different roles and character of different areas [...];*
- *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change [...];*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with the other policies in this Framework; and*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.*

5.8 With regard to delivering a wide choice of high quality homes, paragraph 47 requires local planning authorities to *“boost significantly the supply of housing”* (p.12) and paragraph 49 states:

“Housing applications should be considered in the context of the presumption in favour of sustainable development” (p.13).

5.9 Paragraph 111 of the NPPF supports the redevelopment of brownfield land provided that it is not of environmental value as detailed below:

“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”.

5.10 When discussing development which relates to a heritage asset or Listed Building, Paragraph 131 states that:

“In determining planning applications, local planning authorities should take account of:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness”.*

5.11 The Government also attaches great importance to the design of the built environment, which is illustrated in section 7 of the NPPF. In particular, NPPF paragraph 58 states that planning policies and decisions should aim to ensure that developments:

- *“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;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.”*

Local Policy

5.12 As indicated above, adopted local planning policy is currently set out within the Reading Borough Core Strategy (2008, as altered in 2015), the Reading Central Area Action Plan (2009) and the Sites and Detailed Policies Document (2012, altered 2015).

5.13 Relevant local planning policies for this application are as follows:

Core Strategy

5.14 The Core Strategy provides the overall planning strategy and principles of development for the Borough. It was formally adopted in 2008, with an alteration made in 2015 to the affordable housing policy.

5.15 Relevant policies from the Core Strategy are summarised below:

- Policy CS1 – Sustainable Design and Construction: Proposals should ensure that the design of buildings and site layouts use energy, water, minerals, materials and other natural resources efficiently by meeting several requirements
- Policy CS4 – Accessibility and Intensity of Development: This Policy states that any new development must be at a scale, density and intensity appropriate to the level of accessibility to defined districts and local centres
- Policy CS5 – Inclusive Access: Policy CS5 states that all buildings should be located, sited and designed to provide suitable access for all potential users, including disabled people
- Policy CS7 – Design and the Public Realm: The Policy states that all development must be of a high design quality and that new development should make a positive contribution to the Council’s urban design objectives. The Policy states that development will need to respond positively to the local context and create or reinforce local character and distinctiveness and be visually attractive as a result of high quality built form and spaces

- Policy CS11 – Use of Employment Land for Alternative Uses: For sites located outside of Core Employment Areas, proposals which would result in the loss of employment land are assessed against a set of criteria which determines whether the loss of employment land for other uses such as residential, is viable
- Policy CS14 – Provision of Housing: Provision will be made for the completion of an average 521 dwellings per annum in the period 2016-2026 through various sources of supply
- Policy CS15 – Location, Accessibility, Density and Housing Mix: Policy CS15 requires an appropriate density and mix of residential development to be informed by an assessment of the characteristics of the site and surrounding area. In terms of density, the Policy advises that net densities below 30 dwellings per hectare (dph) will not be acceptable and that development in an 'urban' location should target a residential density of between 40-75 dph
- Policy CS20 – Implementation of The Reading Transport Strategy (Local Transport Plan 2006-2011): This policy states proposed developments should contribute to the transport network as defined in the Reading Transport Strategy, including the provision of making alternative uses to the private car more attractive
- Policy CS24 – Car/Cycle Parking: This Policy requires that maximum car and cycle parking standards are applied in relation to the accessibility of locations within the Borough
- Policy CS33 – Protection and Enhancement of the Historic Environment: This Policy details that historic features and areas of historic importance, which include Listed Buildings and Conservation Areas, will be protected and where appropriate, enhanced
- Policy CS34 – Pollution and Water Resources: This policy seeks to reduce the impact of pollution on proposed developments through mitigation measures
- Policy CS36 – Biodiversity and Geology: This policy states that any features of biodiversity or geological interest that are found on a site, should be retained and protected

Reading Central Area Action Plan

- 5.16 This document was formally adopted in 2009 and focuses on development within the centre of Reading. It aims to guide future development to ensure Reading is developed sustainably and areas of opportunity are recognised.
- 5.17 Policies considered relevant to the site are summarised below:
- Policy RC5 – Design in the Centre: Development within the Reading central area should demonstrate that it will build on and respect the existing grid layout structure of the central area, it will provide appropriate well design public spaces and that the architectural details and materials used should be high quality and respect the form in area local to the development site

- Policy RC9 – Living in the Centre: Proposals for residential development will be assessed against a set of criteria which ensures residential development will contribute towards a mix of sized units, that an application has demonstrated how issues surrounding noise and air quality have been mitigated, amongst other factors

Sites and Detailed Policies Document (SDPD)

5.18 This document sets out RBC's specific and detailed policies used for determining planning applications. It was formally adopted in 2012, with an alteration made in 2015 to the affordable housing policy.

5.19 Policies considered relevant to the site are summarised below.

- Policy SD1 – Presumption in Favour of Sustainable Development: This policy states that a positive approach will be taken when considering development proposals, in compliance with national policy
- Policy DM1 – Adaptation to Climate Change: Developments should demonstrate how the design has incorporated measures to adapt to climate change
- Policy DM4 – Safeguarding Amenity: Policy DM4 states that the design of a scheme for existing and new residential properties should have regard to the following key areas:
 - Privacy and overlooking,
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of a development; and
 - Artificial lighting.
- Policy DM5 – Housing Mix: Policy DM5 requires that all new-build dwellings in any location should be built to Lifetime-Homes standards. The Policy will also ensure an appropriate range of housing types and sizes are supplied
- Policy DM6 – Affordable Housing: Policy DM6 states that on development sites between 5 – 9 dwellings, 20% of affordable housing provision should be provided. However, it should be noted that the High Court decision following West Berkshire District Council and RBC's Judicial Review of the Written Ministerial Statement (2014) led to RBC's Committee agreeing that Policy DM6 would not apply for proposals that solely involve the conversion of an existing property which involves the provision of 10 or less dwellings
- Policy DM8 – Residential Conversions: Proposals to convert properties into self-contained flats will only be acceptable where the proposal respects the physical character of the area and there are no unacceptable adverse impacts to other residential properties
- Policy DM10 – Private and Communal Outdoor Space: This policy requires dwellings to be provided with functional private or communal open space that allows for suitable multiple uses. Design of outdoor areas should respect the size and character of other similar spaces in the vicinity, ensure they are appropriately related to the main entrances, and not compromise the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing

- Policy DM12 – Access, Traffic and Highway-Related Matters: Development will only be permitted where it would not have a material detrimental impact on the functioning of the transport network
- Policy DM19 – Air Quality: Where a development introduces sensitive uses such as residential into an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measure should be detailed in any planning application

Pre-Submission Draft Emerging Reading Borough Local Plan (2017)

- 5.20 RBC is undertaking a review of their policies in their emerging Local Plan. Consultation of a Pre-Submission Draft Local Plan took place between the 30 November 2017 and 26 January 2018. After this consultation period, the Council submitted the Local Plan to the Secretary of State on 29 March 2018.
- 5.21 The Council envisage adopting the emerging Local Plan in January 2019. This will supersede all existing documents containing the main planning policies including the Core Strategy, the SDPD and the Reading Central AAP.
- 5.22 Due to the stage of progression of the emerging Local Plan, it will be worth noting relevant policies in relation to the site, although they carry limited weight in planning decisions at the current time.
- Policy CC1 – Presumption in Favour of Sustainable Development: This policy states that a positive approach will be taken when considering development proposals, in compliance with national policy
 - Policy CC2 – Sustainable Design and Construction: Proposals should ensure that the design of buildings and site layouts use energy, water, minerals, materials and other natural resources efficiently by meeting several requirements
 - Policy CC3 – Adaptation to Climate Change: The development should maximise resistance to climate change through the implementation of several measures. Some of these include solar shading, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight
 - Policy CC6 – Accessibility and the Intensity of Development: This policy states that any new development must be at a scale, density and intensity appropriate to the level of accessibility to defined districts and local centres
 - Policy CC7 – Design and the Public Realm: The Policy states that all development must be of a high design quality and that new development should make a positive contribution to the Council's urban design objectives. The Policy states that development will need to respond positively to the local context and create or reinforce local character and distinctiveness and be visually attractive as a result of high quality built form and spaces
 - Policy CC8 – Safeguarding Amenity: states that the design of a scheme for existing and new residential properties should have regard to the following key areas:
 - Privacy and overlooking,
 - Access to sunlight and daylight;

- Visual dominance and overbearing effects of a development; and
 - Artificial lighting.
- Policy EN1 – Protection and Enhancement of the Historic Environment: Historic features, including their setting will be protected and where possible enhanced
- Policy EN6 – New development in a Historic Context: New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities
- Policy H2 – Density and Mix: The indicative density range for an urban area is 40-75dph. Net densities of below 30 dph will not be acceptable
- Policy H3 – Affordable Housing: All developments of 10 dwellings and above should identify 30% of the total number of dwellings as affordable housing
- Policy H10 – Private and Communal Outdoor Space: This Policy requires dwellings to be provided with functional private or communal open space. Houses will be provided with private outdoor space whereas flats may be provide with communal outdoor space, balconies and/or roof gardens
- Policy TR1 – Achieving the Transport Strategy: Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan

Revised Parking Standards and Design SPD (2011)

- 5.23 The SPD divides the Borough into four different zones for parking standards, depending on its level of accessibility. Zone 1 is the Central Core Area that is seen as the most accessible, and Zone 4 is identified as the Wider Urban Area, with the least accessibility to public transport.
- 5.24 The SPD confirms that the site is located in Zone 2, which is defined as the primary core area and is well served by public transport, with much of this area within an acceptable walking distance of the main railway station. The parking standards for Zone 2 are summarised in Table 5 below.

Table 5: Reading Borough Car Parking Standards Zone 2 (2011)

Housing Mix	Car Spaces Required
1-2 bed flat	1

- 5.25 In addition to this, the SPD also details the standards for cycle provision for new developments, which is summarised in Table 6 below.

Table 6: Reading Borough Cycle Parking Standards (2011)

Housing Mix	Cycle Spaces Required
1-2 bed flat	0.5 spaces per flat

- 5.26 The SPD states that provision for cycle parking is considered essential for most development. It also sets out that if no individual secure facility is required, communal cycle parking can be provided.

Planning Obligations under Section 106 (2015)

- 5.27 With the introduction of a CIL charge, the use of S106 obligations is restricted to site specific impacts, for instance enabling works such as site access, or the provision of facilities and infrastructure directly required as a result of large scale developments, and the provision of affordable housing.
- 5.28 The Planning Obligations under Section 106 (2015) sets out the Council's approach in securing contributions and requiring obligations from development, alongside the CIL charge.
- 5.29 S106 obligations are typically secured for affordable housing and infrastructure which is required as a result of specific development (and which is not included in the CIL Regulation list as being funded wholly or partly by CIL).

6. CONSIDERATION OF PLANNING ISSUES

- 6.1 This section of the Planning Statement provides an assessment of the proposed development against relevant planning policy and other material considerations.
- 6.2 Where relevant, this section also summarises the findings of other documentation submitted in support of the application in the context of the relevant planning policy framework, and as such this Statement should be read alongside all the other application documents listed in the supporting schedule of documentation.

Principle of Residential Use / Loss of Offices

- 6.3 The site currently accommodates two interlinked buildings, namely 108 London Street and Prince Regent House, both of which are lawfully in office use however have been vacant for over a year. As the site is within a sustainable location, the principle of conversion to residential use is in line with Paragraph 111 of the NPPF which states that planning decisions should encourage the effective use of land by re-using land that has been previously developed. The development proposed in this application ensures that efficient use is made of the previously developed land. In addition to this, it is worth noting that there are no local plan policies which resist the loss of offices to other uses.
- 6.4 The site represents an opportunity to convert an existing building in order to provide much needed housing. Indeed, the proposed development will see 108 London Street return to its original use.
- 6.5 The site lies within the southern part of central Reading. London Street contains a mixture of uses including ground floor retail units, office buildings and residential uses especially on the upper floors. St Giles Close to the rear of the site comprises a mix of office space and residential uses.
- 6.6 The principle of conversion to residential use was confirmed through the pre-application response from RBC which states:

“The site is on previously developed land within the urban area and is therefore considered suitable for residential development in principle.

Given the evidence of other conversions from office to residential in the nearby area, the fact that the offices have been vacant for some time, together with the availability of office accommodation within the Borough, small and convoluted nature of accommodation within the proposal building and the prevalence of other residential uses to the upper floors of buildings elsewhere within London Street, it is not considered that there would be an in principle objection to the loss of office accommodation in this instance.”

Design, Scale and Layout

- 6.7 In accordance with Policy RC5 of the Reading Central AAP, the proposed development delivers a high standard of design and layout and takes into account context and appropriate materials. Indeed, the existing scale of development, which will remain unchanged, reflects the character and scale of buildings in London Street and St Giles Close and is therefore in accordance with Policy RC5.
- 6.8 Furthermore, in accordance with Policy CS7 of the Core Strategy, the proposed development responds positively to its local character, including the need to protect and enhance the historic environment; and address the needs of all in society. The proposed apartments would be located within the existing buildings along London Street and St Giles Close and no amendments are proposed to the frontage of 108 London Street to ensure that the proposed development would not harm the Listed Building or the character of the Conservation Area.
- 6.9 No change is proposed to the external materials of the building to ensure that there is no harm to the Listed Building and to ensure that the proposed development does not harm the character of the wider Conservation Area.

Residential Amenity

- 6.10 In accordance with Policy DM4 of the SDPD which seeks to protect the amenity of future occupiers of development in terms of privacy and outlook, no extensions are proposed to the existing built form.
- 6.11 The proposal has been carefully designed in order to be sympathetic to surrounding residential properties to ensure that the conversion would not adversely impact their outlook or privacy.
- 6.12 Policy DM4 of the SDPD states that to achieve privacy, a back to back distance of 20 metres is required between properties, although circumstances on individual sites may enable homes to be closer without a detrimental impact on privacy.
- 6.13 It is recognised that the distance from the window of the first floor of Apartment 6 to the rear part of the neighbouring property, Alder House, is less than 10 metres. This relationship currently exists as no extensions or new window openings are proposed which would reduce residential amenity from that which currently exists. On this basis, the proposed development will have no greater harm to privacy for existing or new residents.
- 6.14 In addition to this, although there is a 13 metre separation distance between the first and second floor windows within the courtyard, the pre-application response received from RBC confirmed that *“on balance, as a conversion in an urban context this separation is considered adequate”*.

- 6.15 It is recognised that the supporting text of Policy DM10 of the SDPD requires 25 sq. m of outdoor amenity space to be provided for 1 and 2 bedroom apartments, although given the proposal comprises the conversion of existing buildings within a central location, it is not possible to comply with this.
- 6.16 The ground floor apartments will both have access to a private courtyard. However, all of the apartments would benefit from the sustainable location of the site with outdoor public amenity space being provided in close proximity. This includes the Forbury Gardens within Reading Town Centre.
- 6.17 The pre-application response for this site also recognises that although the amenity space provided in the proposed development does not accord with the requirements of Policy DM10:

“Given the central location of the proposals, as with other town centre sites, it is considered reasonable that future occupants will benefit from nearby parks and recreation facilities and that the desirability of securing a future use of the listed building would outweigh any concerns regarding lack of amenity space in this location”.

- 6.18 Therefore, that the level of amenity space provided as part of this development should be considered acceptable.

Housing Mix and Tenure

- 6.19 Policy RC9 of the Reading Central AAP states that all proposals for residential development within the central area are required to provide a mix of different sized units and that ideally, a mixture of one, two and three bedroom homes should be provided.
- 6.20 As the proposed housing mix comprises 1 and 2 bedroom apartments, it will deliver a mix in accordance with Policy RC9. Given the limitations associated with converting existing buildings, its central location, and the small number of homes proposed, inclusion of any three bedroom apartments would be inappropriate.
- 6.21 Policy DM6 of the SDPD states that on sites of 5-9 dwellings, a 20% affordable housing provision will be sought. However, RBC’s guidance for determining planning applications against Policy DM6 states that:

“To implement Policy DM6 as currently adopted in the SDPD but excluding proposals that solely involve the conversion of an existing property, where the conversion involves the provision of 10 or less dwelling units”.

- 6.22 On this basis, it is acceptable for this development to not provide affordable housing.

Sustainability

- 6.23 Policies CS1 and CS2 of the Core Strategy state that new developments will be acceptable where the design of buildings and site layouts use energy, water, minerals and materials appropriately and efficiently. Developments should also demonstrate measures to minimise the generation of waste in the construction, use and life of buildings, and promote more sustainable approaches to waste management.
- 6.24 A Sustainability Statement, prepared by Blew Burton Ltd accompanies this application. This assesses a number of factors impacting the proposed development such as the energy conservation and carbon emission impact, water resource management, ecology and biodiversity, waste and pollution, and materials selection and the sustainable construction methods used.
- 6.25 The report determines that the building should remain energy efficient for its entire lifetime and details that each apartments will have an individual, easily accessible water meter installed in order to encourage the future residents to keep their water usage to a minimum.
- 6.26 It concludes that the development can demonstrate a strong commitment to sustainability, and incorporates many sustainable features which are consistent with achieving a high level of overall sustainability. It is concluded that the proposed development should meet the BREEAM Domestic Refurbishment Scheme requirement of 'Very Good'.
- 6.27 Further details on the sustainability of the proposed development can be found within the Sustainability Statement which accompanies this application.

Highways and Parking

- 6.28 Policies CS22 and CS24 of the Core Strategy state that development should ensure an adequate level of accessibility, with car and cycle parking requirements applied in relation to the accessibility of locations to sustainable transport facilities.
- 6.29 In addition to this, Policy DM12 of the SDPD states that access and servicing arrangements for developments should be safe and comply with the Highways Authorities standards.
- 6.30 The site is located in a sustainable location, with the town centre retail facilities located within 0.3 miles of the site and a number of key facilities including schools, restaurants and shops within this distance. In addition, there are two railway stations within a 1.5 mile area (one of which is less than a mile away) which provide direct access into London. Finally, there is a bus stop directly outside of 108 London Street.
- 6.31 Access to the site would remain as the existing, with pedestrian access provided directly off London Road which is a one-way single carriageway and vehicular and pedestrian access from St. Giles Close which consists of a 5 metres cul-de-sac.

- 6.32 RBC sets out their parking standards within their Revised Parking Standards and Design SPD, which identifies the site as being located within Zone 2 'Primary Core Area'. For Zone 2, the SPD states that 7 spaces parking spaces are required. The proposal provides 4 car parking spaces. However, the proximity of the site to the two railway stations and to the bus stop must be taken into account. With such close proximity to public transport, it can realistically be considered that residents would use public transport.
- 6.33 The SPD also states that cycle parking provision should be provided at a minimum of 0.5 spaces per dwelling. The proposal is providing twelve bicycle spaces in the basement of the building, with a further four spaces to the rear of the property which complies with local policy standards.
- 6.34 In addition to this, the pre-application response received in relation to this application stated that *"given the town centre sustainable location and parking restriction to surrounding roads any under provision of parking is not likely to be contentious"*.
- 6.35 The Transport Statement considers the proposed traffic generation from this development and, based on TRICS data, calculates that there could be approximately two person trips in the morning and evening peak periods respectively. The Transport Statement confirms that the proposed development would result in an overall decrease in person trips and vehicle movements from the site, having an overall positive impact from a transportation capacity perspective.
- 6.36 For further consideration on the highways impacts of the proposed development please see the Transport Statement.

Flooding and Drainage

- 6.37 Policy CS1 of the Core Strategy seeks to ensure that development minimises water runoff and seek opportunities to reduce the risk of flooding. The site is located in a Flood Zone 1 which carries the lowest risk of flooding and therefore any residential development at this location is unlikely to experience detrimental issues surrounding flooding.
- 6.38 The proposed drainage strategy for the site includes connecting the drainage to the existing drainage system that is already in place for the building. Therefore, the proposed development will not have any detrimental impact on the existing drainage infrastructure.

Daylight / Sunlight

- 6.39 Policy DM4 of the SDPD states that developments must not cause a detrimental impact to the living environment of residential occupiers in terms of access to sunlight and daylight.
- 6.40 A Daylight and Sunlight (Within Development) study accompanies this application. The study checks whether the proposed ground floor apartments will receive satisfactory levels of daylight and sunlight.

- 6.41 The study confirms that all rooms on the ground floor meet or surpass the Building Research Establishment (BRE) Average Daylight Factors targets with the exception of one of the bedroom windows. However, as daylight in a bedroom is less important than in other habitable rooms, the BRE guide can be used flexibly. As such, the study concludes that the proposed development is acceptable on daylight grounds.
- 6.42 In terms of sunlight, all rooms which face within 90 degrees of due south were tested for direct sunlight. Although not all ground floor rooms receive the ideal levels of direct sunlight, the BRE guide acknowledges that it is not always possible for all apartments to be situated in a position to receive direct sunlight and given the highly dense urban location the site is situated within, the study concludes that levels of direct sunlight received by the ground floor rooms are acceptable.
- 6.43 The study concludes that the proposed development design is compliant with the BRE recommendations.

Heritage

- 6.44 Paragraph 17 of the NPPF sets out the twelve principles which should underpin plan making and decision taking in planning. One of these principles include the conservation of *“heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”*.
- 6.45 A Heritage Statement has been provided in support of the application to demonstrate that the internal alterations proposed for the existing building will not result in significant harm to the Listed Building at 108 London Street.
- 6.46 The statement suggests that the building has already undergone a substantial number of alterations made internally during the 20th Century, which has impacted on its historic significance. Therefore, the proposed internal alterations would only result in limited harm to the significant historic fabric and that these changes can be mitigated through the retention of some of the more historically significant features such as the fireplaces.
- 6.47 The statement concludes that the proposed conversion of the building will provide a future use and ensure the long term preservation of the building. The necessary internal alterations proposed are needed in order to achieve a viable development, and in turn the result of the development will enhance and protect the Listed Building for the long term.
- 6.48 The proposed development accords with the core principle of the planning system as stated within the NPPF in that it would deliver the restoration and long term sustainable future for 108 London Street. Further details of the heritage asset and the impacts of the proposed development can be found within the Heritage Statement.

Noise

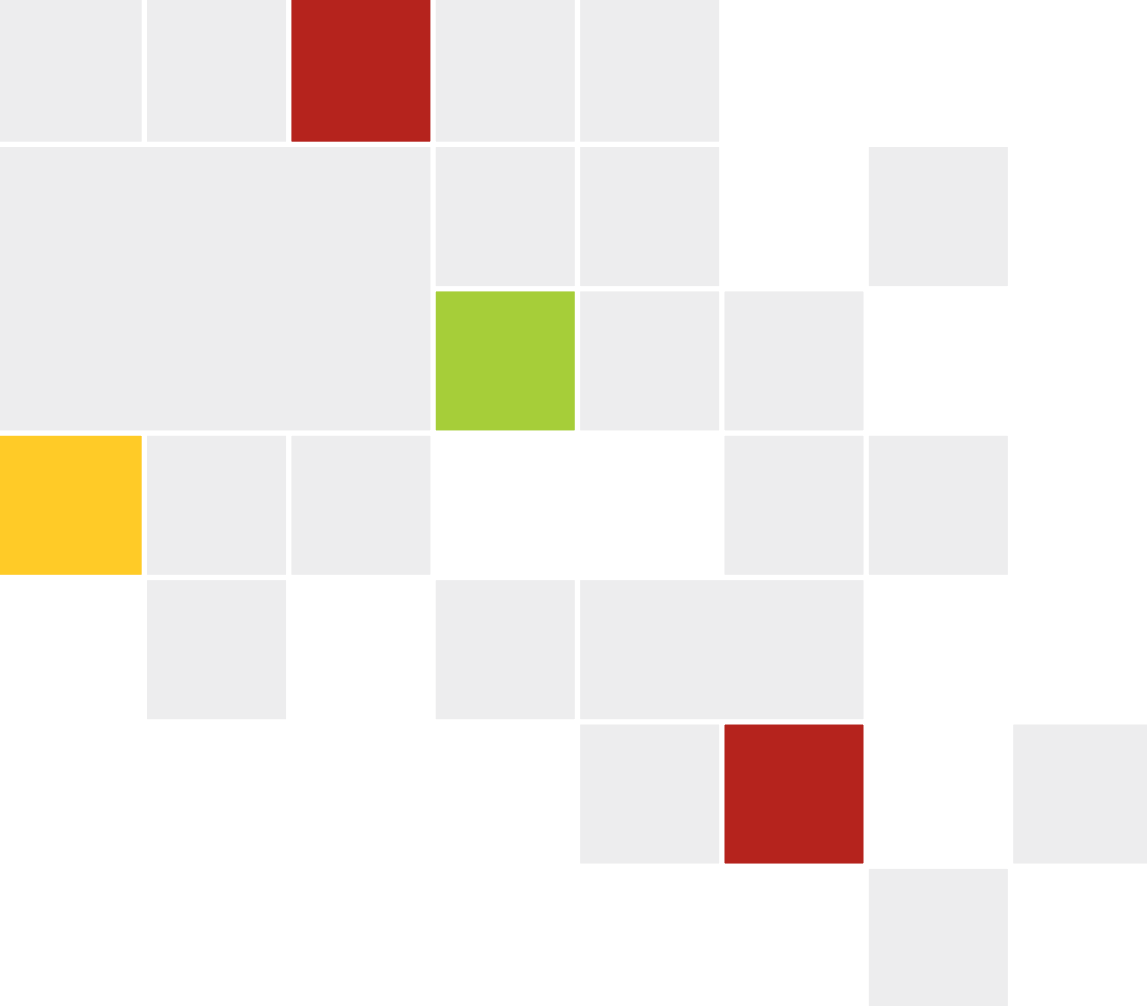
- 6.49 Policy RC9 of the Reading Central AAP requires that new residential development within the central area are adequately protected from surrounding noise and disturbance sources.
- 6.50 Environmental Noise and Vibration Assessments have been undertaken by Paragon Acoustic Consultants in support of this application. Noise measurements were taken 1 metre from the façade of Prince Regent House at first floor level and 1 metre from the façade of the London Road elevation, at first floor level in order to gain a full insight in to the noise levels from traffic and neighbouring properties on London Street. Measurements were recorded in continuous 5 minutes samples over 30 minute periods for the survey duration of 11 days at Prince Regent House and 3 days on the London Street elevation.
- 6.51 The measurement demonstrated that the site is not exposed to high noise levels, despite the proximity of the site to neighbouring properties, including the night club.
- 6.52 The report confirms that noise insulation mitigation can be provided to ensure that noise levels inside rooms would comply with British Standards.

Refuse/Recycling

- 6.53 Policy CS2 of the Core Strategy states that all developments should provide adequate space to facilitate waste storage, refuse, recycling and composting.
- 6.54 A secure refuse/recycling storage point is proposed to the rear of the building located within the car park, only a short distance from the entrance to Prince Regent House which will provide refuse storage for Apartments 1, 2, 4 and 5.
- 6.55 An additional refuse and recycling storage area is proposed within the basement of 108 London Street, which will utilise the existing ventilation in this area. This storage area will have capacity to store the refuse generated from Apartments 3, 6 and 7, and refuse will be placed adjacent to the property on collection days.

7. SUMMARY AND CONCLUSIONS

- 7.1 The application to which this Planning Statement relates is submitted on behalf of Aspire 108 London Street Ltd and seeks full planning permission and Listed Building consent for the conversion of existing offices to residential apartments at 108 London Street and Prince Regent House, Reading.
- 7.2 This Planning Statement demonstrates that the proposed development complies with the adopted development plan and national policy and will contribute to meeting the spatial strategy and housing needs within Reading.
- 7.3 The proposed development would provide seven high quality designed apartments in a highly sustainable location with associated parking and refuse storage.
- 7.4 Pre-application discussions have been undertaken with the Council which have subsequently resulted in changes being made to the proposal, including changes to design, size and massing of buildings.
- 7.5 This Planning Statement demonstrates that the proposed development fulfils the potential of the existing buildings and will ensure the long term preservation of the Listed Building. The proposed development would respect the importance of the heritage asset and would not adversely impact the surrounding area or the existing road network.
- 7.6 Overall, the proposed development is therefore considered to comprise a suitable and sustainable development that would contribute towards the Council's housing need. It has been demonstrated throughout this Planning Statement and the suite of technical documents that support the application submission that any harm arising from the proposals will not "significantly and demonstrably outweigh the benefits" of the scheme.
- 7.7 The planning application and proposals contained within are therefore commended to RBC for due consideration.



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