



Conversion to Residential 108 London
Street and Prince Regent House,
Reading

Transport Statement

for

Aspire 108 London Street Limited

Document Control Sheet

Transport Statement

108 London Street and Prince Regent House, Reading

Aspire 108 London Street Ltd

This document has been issued and amended as follows:

Date	Issue	Prepared by	Approved by
02/07/2018	1 st Draft	Chris Saunders	James Bancroft
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1.0 Introduction

- 1.1 This Transport Statement has been prepared on behalf of Aspire 108 London Street Ltd to accompany a planning application for the conversion of an existing building from offices (Class B1) to residential flats (Class C3) at 108 London Street and Prince Regent House, Reading
- 1.2 The site is located within 500 metres from the centre of Reading within the administrative boundaries of Reading Borough Council (RBC). The local highway network is focused around London Street (A327), Crown Street (A4) and St Giles Close, with St Giles Close providing vehicular access to the site. The site is also accessible by the more sustainable modes of transport including foot, cycle and public transport. For example bus stops served by regular services are adjacent to the site. The application site currently comprises 456 square metres of office space (land use class B1) and benefits from four parking spaces.
- 1.3 The proposed scheme comprises the provision of seven residential dwellings which will include 3 x two bed dwellings and 4 x one bed dwellings, which will utilise the existing parking area.
- 1.4 This Transport Statement, which has been prepared in accordance with current best practice guidance, demonstrates that:
 - ▶ The site accords with national and local policies relevant to transport;
 - ▶ The site is accessible by public transport, walking and cycling;
 - ▶ Suitable and appropriate access to the site can be achieved from the existing site access on St Giles Close;
 - ▶ Having regard to relevant design guidance, appropriate provision is made for servicing and
 - ▶ The residual impact of the proposed development will not be severe.
- 1.5 Following this introduction, this Transport Statement is split into five sections as follows:
 - ▶ Section 2 outlines the transport planning policies that are considered to be pertinent to this application.
 - ▶ Section 3 considers the existing use of the site and reviews the accessibility of the site by all modes of transport;
 - ▶ Section 4 provides an overview of the proposed development together with the details related to the access, parking and servicing strategies that will be adopted;
 - ▶ Section 5 assess the trip generating potential of the proposed development, and provides an overview of the likely impacts that these are likely to have; and.
 - ▶ Section 6 summarises the key findings and conclusions of the report.

2.0 Transport Planning Policy

Overview

- 2.1 There are a number of documents that contain planning policies relevant to transport. Those that set the context for the development proposals are as follows:

- ▶ National Planning Policy Framework – March 2012;
- ▶ Planning Practice Guidance;
- ▶ Reading Borough Local Development Framework, Core Strategy – January 2008; and,
- ▶ Reading Borough Local Development Framework, Sites and Detailed Policies Document – October 2012

National Planning Policy Guidance

- 2.1 The National Planning Policy Framework (NPPF) was published in 2012 and sets out a presumption in favour of sustainable development that recognises the importance of transport policies in facilitating sustainable development, and that planning decisions should have regard to local circumstances. In this regard, paragraph 29 of the NPPF states:

"The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas."

- 2.2 Similarly, paragraph 30 states that:

"In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."

- 2.3 Moreover, paragraph 34 notes:

"Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However, this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas."

- 2.4 Paragraph 35 therefore requires developments (where practical to do so) to be located and designed to:

"...give priority to pedestrian and cycle movements, and have access to high quality public transport facilities..."

- 2.5 Ultimately, the NPPF requires local planning authorities to:

"...consider whether:

- *The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *Safe and suitable access to the site can be achieved for all people; and,*
- *Improvements can be undertaken within the transport network that cost effectively limit the impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"* (NPPF, paragraph 32)

Planning Practice Guidance

- 2.6 The Planning Practice Guidance (PPG), which is available of the Department for Communities and Local Government (DCLG) website, supports the overarching aims of the NPPF. Highways and transportation matters are dealt with at Section ID42 of the NPPG under the heading of “*Travel plans, transport assessments and statements in decision taking*”.
- 2.7 Paragraph 11 of ID42 recommends that Travel Plans submitted in support of a planning application should, where possible to do so, include:
- *benchmark travel data including trip generation databases;*
 - *Information concerning the nature of the proposed development and the forecast level of trips by all modes of transport likely to be associated with the development;*
 - *relevant information about existing travel habits in the surrounding area;*
 - *proposals to reduce the need for travel to and from the site via all modes of transport; and*
 - *provision of improved public transport services.*
- 2.8 With respect to Transport Assessments and Transport Statements paragraph 15 of ID42 notes a planning application should typically consider the following:
- *information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport);*
 - *information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;*
 - *data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;*
 - *a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;*
 - *an assessment of trips from all directly relevant committed development in the area (i.e. development that there is a reasonable degree of certainty will proceed within the next three years);*
 - *data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;*
 - *an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent three-year period, or five-year period if the proposed site has been identified as within a high accident area;*
 - *an assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas);*
 - *measures to improve the accessibility of the location (such as provision/ enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;*
 - *a description of parking facilities in the area and the parking strategy of the development;*
 - *ways of encouraging environmental sustainability by reducing the need to travel; and*
 - *measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.*

Reading Borough Local Development Framework

- 2.9 Planning applications within Reading Borough are assessed against the planning policies contained within the Core Strategy adopted in 2008 and The Sites and Detailed Policies Document adopted in 2012. A summary of the policies which are relevant to the proposals are as follows:
- ▶ *Core Strategy Policy CS22 - Transport Assessments:* Developments should ensure an adequate level of accessibility.
 - ▶ *Core Strategy Policy CS24 - Car/Cycle Parking:* Car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations to sustainable transport facilities.
 - ▶ *Sites and Detailed Policies Document Policy DM12:* Access and servicing arrangements to developments should be safe and comply with the Highway Authorities standards.
- 2.10 Having regard to Core Strategy Policy CS24 it should be noted that the adopted parking standards are set out in the Reading Borough Council Supplementary Planning Document entitled "*Revised Parking Standards and Design*" (SPD) adopted October 2011. The guidance operates on a zonal system depending on the proximity of sites to local centres and public transport provision.
- 2.11 The application site is within Zone 2, the Primary Core Area which surrounds the town centre is within Zone 1. Zone 2 extends to walking distances up to 2 kilometres from the town centre and includes areas well served by public transport. The boundary between Zone 1 and Zone 2 is the Inner Distribution Road and is noteworthy that the boundary between Zone 1 and Zone 2 is only circa 200 metres north of the application site.
- 2.12 The maximum parking standards for 1/2 bed dwellings within Zone 2 is 1 space per unit, while the maximum parking standards for 1/2 bed dwellings within Zone 1 is 0.5 spaces per dwellings. The SPD also requires cycle Parking to be provided at a minimum ratio of 0.5 spaces per dwelling.

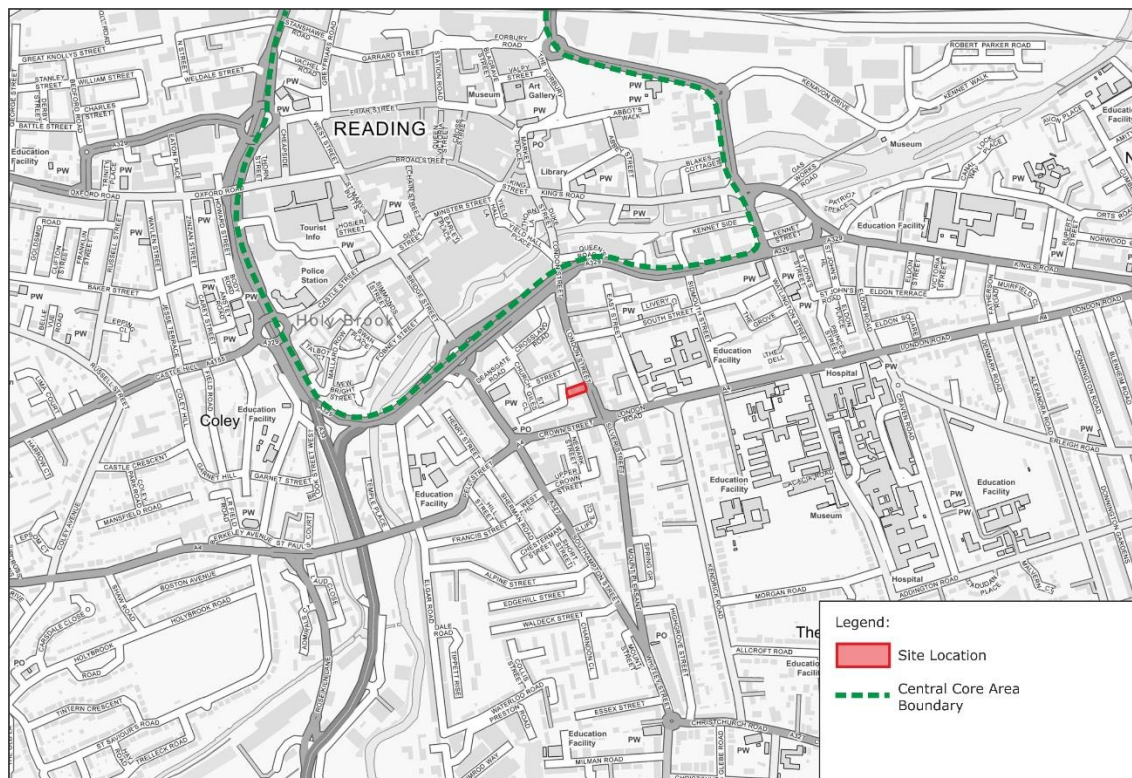
3.0 Baseline Conditions

Overview

- 3.1 So that the context of the site can be established, a review of local highway network in the vicinity of the site has been undertaken. The following text summarises this review and makes reference to the located of the site and baseline traffic conditions. It also sets out an overview of the accessibility of the site by a variety of modes of transport.

Site Details

- 3.2 The application site is located on the west side of London Street, approximately 500 metres to the south of Reading Town centre. A plan showing the location of the site in relation to the local highway network is shown below.



Site Location

- 3.3 The application site currently comprises of 456 square metres of office space (land use class B1), which gains pedestrian access direct from London Street and vehicular access from St Giles Close to the rear.

Highway Network

- 3.4 London Street is a one-way single carriageway road southbound with a contraflow bus lane northbound and is subject to a 30 mile per hour speed limit. The carriageway is circa 9 metres wide and benefits from circa 3 metre wide footways on either side of its carriageway. Pay and Display parking bays are provided along both sides of the carriageway with parking restricted to a maximum stay of 3 hours with no return within 2 hours between the hours of 8am and 8pm, Monday to Sunday.
- 3.5 St Giles Close is a cul-de-sac circa 5 metres in width with a 1.5 metre wide footway on its north side. It is subjected to No Parking restrictions between 8am and 6.30pm Monday to Saturday. St Giles Road connects to Mill Lane, which is adjacent to the Inner Distribution Road via Letcombe Street.

- 3.6 Letcombe Street is 5.5 metres wide with 2 metre footways and has parking restrictions along the carriageway edge. These restrictions are a combination of no parking at any time together with no parking between 8am and 6.30pm Monday to Saturday. Parking bays are provided perpendicular to the road where parking is allowed, however these bays are restricted to a maximum stay of 2 hours with no return for 2 hours between the hours of 8am and 6.30pm Monday to Saturday.

Baseline Traffic Flows

- 3.7 In order to quantify the levels of person trips that are likely to be attracted to the current uses that operates from the site, the TRICS database (version 7.5.1) has been interrogated using the following search parameters, which are representative of the existing situation:

- ▶ Land Use – Employment Office;
- ▶ Regions – England (excluding Greater London);
- ▶ Floor Area – Under 2000 square metres;
- ▶ Parking –1 space per 50m² or lower
- ▶ Selected Locations –Edge of Town Centre and Town/City Centre

- 3.8 The results of the TRICS interrogation are provided at **Appendix A**, whilst a summary of person trips that could typically be generated by the existing offices are set out in Table 3.1 below.

Time Period	Person Trip Rates (Per 100 sqm)			Person Trips (456 sqm)		
	Arrivals	Departures	Totals	Arrivals	Departures	Total
Weekday Morning (08.00-09.00)	3.146	0.264	3.410	14	2	16
Weekday Evening (17.00-18.00)	0.369	2.320	2.689	2	11	13
Daily (07.00-19.00)	12.637	12.267	24.904	58	56	114

Table 3.1 – Trip Rate and Traffic Generation for 456 square metres of Office Use

- 3.9 Table 3.1 indicates that the existing office at the site is likely to generate approximately 16 person trips in the weekday morning peak period, 13 person trips in evening peak periods, and approximately 114 person trips across a typical day.
- 3.10 The 2011 Census Data provided at **Appendix B** indicates circa 38% of trips to Central Reading for work purposes are made by car. Applying this percentage to the data within Table 3.1 suggests the current use has the potential to attract approximately five and six vehicle movements within the morning and evening peak periods respectively, and circa 40 vehicle movements across a typical day.

Sustainable Transport Accessibility

- 3.11 It is generally accepted that walking and cycling provide important alternatives to the private car and should also be encouraged to form part of longer journeys via public transport. Indeed, it is noteworthy that the Institute of Highways and Transportation (IHT) has prepared several guidance documents that provide advice with respect to the provision of sustainable travel in conjunction with new developments. Within these documents it is suggested that:

- ▶ Most people will walk to a destination that is less than one mile (Planning for Walking, 2015);
- ▶ The bicycle is a potential mode of transport for all journeys under five miles (Planning for Cycling, 2015);
- ▶ Walking distances to bus stops should not generally exceed 400 metres, and it is recognised that people are prepared to walk twice as far to rail stations (Planning for Walking, 2015); and,
- ▶ However, walking distances of 500 metres can be applied to bus stops served by two or more high frequency routes (Buses in Urban Developments, 2018).

Accessibility by Foot

- 3.12 London Street benefits from street lighting and wide footways that link the site to the town centre and The Oracle shopping and leisure centre, which is located 400 metres to the north. The town centre has an extensive network of pedestrianised streets which provide direct access to the railway station and main bus interchange which is within a 10 minute walk of the site. The Royal Berkshire Hospital is also within a 10 minute walk of the site which is reached by the wide footways provided along the adjacent London Road.

Accessibility by Cycle

- 3.13 Reading has an extensive network of cycle routes and these are shown within **Appendix C**. London Street is a designated cycle route linking the site to the station and town centre where access to various Reading cycle routes providing access to all areas of the town and suburbs can be obtained, including the employment areas within South Reading and Green Park.

Accessibility by Bus

- 3.14 Reading has an extensive network of bus routes as shown within **Appendix D**. The closest bus stops to the site which are located adjacent to the site entrance on London Street are served by services 5, 6, 6a, 21 and 21a. All the bus services serve the town centre, while services 5 and 6/6a serve the main employment areas in south Reading and services 21/21a serve Reading University.

Accessibility by Rail

- 3.15 Reading Rail station is located 850 metres to the north of the site and is easily accessible by foot. It is also shown within **Appendix C**, that it is possible to access the station by cycle. Indeed, it is worthy to note that a total of 700 cycle parking spaces are provided at the Station.
- 3.16 Reading Rail station is the second busiest interchange station in England after Birmingham New Street and is located at the cross point of the main western main line and north south cross country lines. Destinations including Newbury, Bournemouth, Birmingham, Manchester Piccadilly, London Paddington, Oxford, Penzance, London Waterloo, Cardiff Central, Newcastle, Bristol Temple Meads and Gatwick Airport can be accessed from Reading station.

Summary of Baseline Conditions

- 3.17 The above review demonstrates the site is readily accessible by a variety of modes of transport that have the potential to reduce reliance upon the private car. It is therefore considered that its location accords with the guiding principles of the National Planning Policy Framework.

4.0 Proposed Development

Overview

- 4.1 The following text outlines details of the proposed development, and summarises how it will be accessed along with providing details of the associated parking and servicing strategies.

Development Proposals

- 4.2 The Applicant is seeking to change the use of 456 square metres of the existing B1 office use at 108 London Street and Prince Regent House to seven residential dwellings (3 x two bed dwellings and 4 x one bed dwellings).

Access Arrangements

- 4.3 The existing vehicular access from St Giles Street to the site will be retained in order to serve the proposed development. The visibility splays available conform with the requirements of the Manual for Streets for an access onto a road with a 20 miles per hour speed limit.

Proposed Parking Provision

- 4.4 Similar to the current layout, the proposed car park layout provides four spaces which is in accordance with the parking standards detailed within Section 2 for a site within Zone 1. While the site is within Zone 2 as also detailed within Section 2 the Zone 1 boundary is located 200 metres to the north of the applications site. It is noteworthy that within the pre planning response from Reading Borough Council, included within **Appendix E**, the planning officer confirms that a parking provision in accordance with the Zone 1 standards would be acceptable.
- 4.5 A review of the parking provision of recent planning approvals for the conversion of offices to residential dwellings along London Street has been undertaken. Table 4.1 summarises the application number, the proposed development and the parking standard approved.

Planning Application and Address	Proposed Development	Agreed Parking Provision
131331 – 52 London Street	Change of use from A1/D1 to 2x1 bed flats and 1x2 bed flats	No parking provision given proximity to Zone 1
131560 – 88 London Street	Change of use from B1 office to a single residential dwellings	No parking provision given proximity to Zone 1
140604 - 83-85 London Street	Change of use from B1 office to 4x2 bed flats and 1x1 bed flats	Four parking spaces provided at 0.8 spaces per dwelling in existing parking area
150596 – 49-53 London Street	Change of use from B1 offices to mixed use of B1 offices and 3x3 bedroom flats and 1x1 bedroom flat	Five parking spaces required only three spaces provided.

Table 4.1 – Planning Application Review

- 4.6 Table 4.1 indicates that Reading Borough Council, when assessing the parking requirement for similar applications, have concurred that parking for residential dwellings can be in accordance with the SPD Zone 1 requirements instead of the requirements of Zone 2 given the proximity to the town centre and sustainable modes. The parking provision therefore proposed for development follows this precedence.
- 4.7 Seven Cycle parking spaces will be provided within the basement, while four cycle parking spaces will be provided by the rear refuse store which is in accordance with the requirements of Reading Borough Council.

Servicing Arrangements

- 4.8 The servicing arrangements for the building will mirror the existing situation given the listed building status with servicing and refuse collection occurring from the front and rear of the building. A refuse area will be provided at the rear of the car parking area, which will be used by the rear flats accessed from St Giles Close, while the flats accessed from London Street will store their waste within the basement and place it adjacent to the property on collection days.

5.0 Development Impact

Overview

- 5.1 This section outlines the levels of person trips that are likely to be generated by the proposed residential development comprising of seven dwellings, and how this relates to the trip attracting potential of the current office use that operates from the site.

Proposed Trip Generation

- 5.2 The TRICS database (version 7.5.1) has again been interrogated to find comparable sites in order to obtain trip rate information for the proposed land uses at the site. The affordable flats sub category has been used as this data set contains sites with a parking provision of less than one space per flat which is representative of the proposed development. The TRICS outputs are included within **Appendix F**, while a summary of the results are shown at Table 5.1. Weekday surveys for all sites in comparable locations (excluding sites in London) were selected from the database.

Time Period	Person Trip Rates (Per Unit)			Person Trip Generation (7 Units)		
	Arrivals	Departures	Totals	Arrivals	Departures	Total
Weekday Morning (08.00-09.00)	0.071	0.132	0.203	1	1	2
Weekday Evening (17.00-18.00)	0.118	0.104	0.250	1	1	2
Daily (07.00-19.00)	1.138	1.321	2.459	8	9	17

Table 5.1 – Traffic Generation Proposed Development

- 5.3 Table 5.1 indicates that the proposed development of seven flats has the potential to generate approximately two person trips in the morning and evening peak periods respectively. The typical weekday equivalent is expected to be in the order of approximately 20 person trips.

Net Impact

- 5.4 The net impact in terms of person trips associated with the existing and proposed development are set out in Table 5.2 below.

Scenario	AM Peak (08.00-09.00)	PM Peak (17.00-18.00)	Daily (07.00-19.00)
Existing Uses	58	56	114
Proposed Development	2	2	17
Net Change	-56	-54	-97

Table 5.2 – Net Change in Person Trips

- 5.5 Table 5.2 indicates that the proposed residential development is likely to result in an overall decrease of approximately 60 person trips in the morning peak period and 50 person trips in the evening peak period respectively. There is also expected to be an overall reduction in trips across to the course of a typical weekday that equate to approximately 100 movements.
- 5.6 Assuming that 38% of all trips made by future residents will be completed by car in accordance with the Census Data presented at Section 3, it is evident that the proposed development could generate 6 vehicle trips per day. This is some 34 fewer vehicles than has been shown at Section 3 to be associated with a 456 square metre office during a similar period (i.e. circa 40).

Summary

- 5.7 The proposed development will result in an overall decrease in person trips and vehicle movements to and from the site. In this regard, it will have an overall positive impact from a transportation capacity perspective. Accordingly the proposals should not be resisted on the basis that they will be detrimental to the free-flow of traffic on the local highway network, or lead to any demonstrable harm to the sustainable transport networks that service the site.

6.0 Summary and Conclusions

- 6.1 This Transport Statement has been prepared on behalf of Aspire 108 London Street Limited to accompany a planning application for the conversion of an existing building from offices (Class B1) to residential flats (Class C3) at 108 London Street and Prince Regent House, Reading
- 6.2 The site is located 500 metres from the centre of Reading within the administrative boundaries of Reading Borough Council. The site is situated in close proximity to bus stops which are served by several regular services that will encourage use of this mode of transport. It is also well located to an established network of pedestrian and cycle infrastructure that enable people to travel to and from the site by these important modes of transport. It is therefore clear that the site is well placed to encourage less reliance upon the private car, and thus represents an ideal location for residential development.
- 6.3 The application site currently comprises circa 456 square metres of office space (land use class B1). The proposals are to convert the building to seven dwellings, which will be provided with four car parking spaces. The vehicular access to the site will remain via St Giles Street and pedestrian access will be remain via St Giles Street and London Road.
- 6.4 In summary, this report demonstrates that:
- ▶ The location of the site accords with the relevant national and local transport planning policies;
 - ▶ The site benefits from access to a sustainable transport network that provides alternatives to the private car;
 - ▶ The site will continue to be accessed / serviced in line with current arrangements for the existing office; and,
 - ▶ The proposals conversion of the office space to residential use will result in a net overall decrease in person trips associated with the site and as such will have an overall positive impact from a transportation capacity perspective.
- 6.5 On the basis of the above, it is clear that the proposals can be accommodated for without detriment to the operation of the local transport network. The proposals therefore constitute a sustainable development for the future and should not be resisted on traffic or transportation grounds.

Appendix A

TRICS Output - Offices

LIST OF SITES relevant to selection parameters

The 'browse and select' feature in TRICS was used to choose the sites to be included in this selected set. The TRICS user browsed the full list of sites for this land use category and selected directly from this list.

1	DC-02-A-08	OFFICE		DORSET
	STATION APPROACH			
	DORCHESTER			
	Edge of Town Centre			
	No Sub Category			
	Total Gross floor area:	1550	sqm	
2	HF-02-A-03	OFFICE		HERTFORDSHIRE
	60 VICTORIA STREET			
	ST ALBANS			
	Edge of Town Centre			
	Built-Up Zone			
	Total Gross floor area:	610	sqm	
3	NF-02-A-02	FINANCIAL PLANNERS		NORFOLK
	NORTH QUAY			
	GREAT YARMOUTH			
	Edge of Town Centre			
	Commercial Zone			
	Total Gross floor area:	894	sqm	
4	TW-02-A-02	UNION OFFICES		TYNE & WEAR
	JOHN DOBSON STREET			
	NEWCASTLE-UPON-TYNE			
	Town Centre			
	Built-Up Zone			
	Total Gross floor area:	1675	sqm	
5	WK-02-A-01	OFFICES		WARWICKSHIRE
	WARWICK ROAD			
	COVENTRY			
	Town Centre			
	Built-Up Zone			
	Total Gross floor area:	960	sqm	

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
SO-02-A-01	To large car park not relalistic comparission

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30									
05:30 - 06:00									
06:00 - 06:30									
06:30 - 07:00									
07:00 - 07:30	5	1138	0.053	5	1138	0.000	5	1138	0.053
07:30 - 08:00	5	1138	0.598	5	1138	0.070	5	1138	0.668
08:00 - 08:30	5	1138	1.125	5	1138	0.053	5	1138	1.178
08:30 - 09:00	5	1138	2.021	5	1138	0.211	5	1138	2.232
09:00 - 09:30	5	1138	1.055	5	1138	0.229	5	1138	1.284
09:30 - 10:00	5	1138	0.615	5	1138	0.316	5	1138	0.931
10:00 - 10:30	5	1138	0.422	5	1138	0.193	5	1138	0.615
10:30 - 11:00	5	1138	0.510	5	1138	0.457	5	1138	0.967
11:00 - 11:30	5	1138	0.369	5	1138	0.492	5	1138	0.861
11:30 - 12:00	5	1138	0.193	5	1138	0.527	5	1138	0.720
12:00 - 12:30	5	1138	0.422	5	1138	0.949	5	1138	1.371
12:30 - 13:00	5	1138	0.703	5	1138	1.195	5	1138	1.898
13:00 - 13:30	5	1138	0.984	5	1138	0.879	5	1138	1.863
13:30 - 14:00	5	1138	1.248	5	1138	0.527	5	1138	1.775
14:00 - 14:30	5	1138	0.527	5	1138	0.580	5	1138	1.107
14:30 - 15:00	5	1138	0.229	5	1138	0.105	5	1138	0.334
15:00 - 15:30	5	1138	0.316	5	1138	0.439	5	1138	0.755
15:30 - 16:00	5	1138	0.404	5	1138	0.369	5	1138	0.773
16:00 - 16:30	5	1138	0.211	5	1138	0.809	5	1138	1.020
16:30 - 17:00	5	1138	0.193	5	1138	1.002	5	1138	1.195
17:00 - 17:30	5	1138	0.299	5	1138	1.336	5	1138	1.635
17:30 - 18:00	5	1138	0.070	5	1138	0.984	5	1138	1.054
18:00 - 18:30	5	1138	0.070	5	1138	0.352	5	1138	0.422
18:30 - 19:00	5	1138	0.000	5	1138	0.193	5	1138	0.193
19:00 - 19:30									
19:30 - 20:00									
20:00 - 20:30									
20:30 - 21:00									
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			12.637			12.267			24.904

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	610 - 1675 (units: sqm)
Survey date date range:	01/01/00 - 11/09/17
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix B

2011 Census Data – Method of Travel to Work

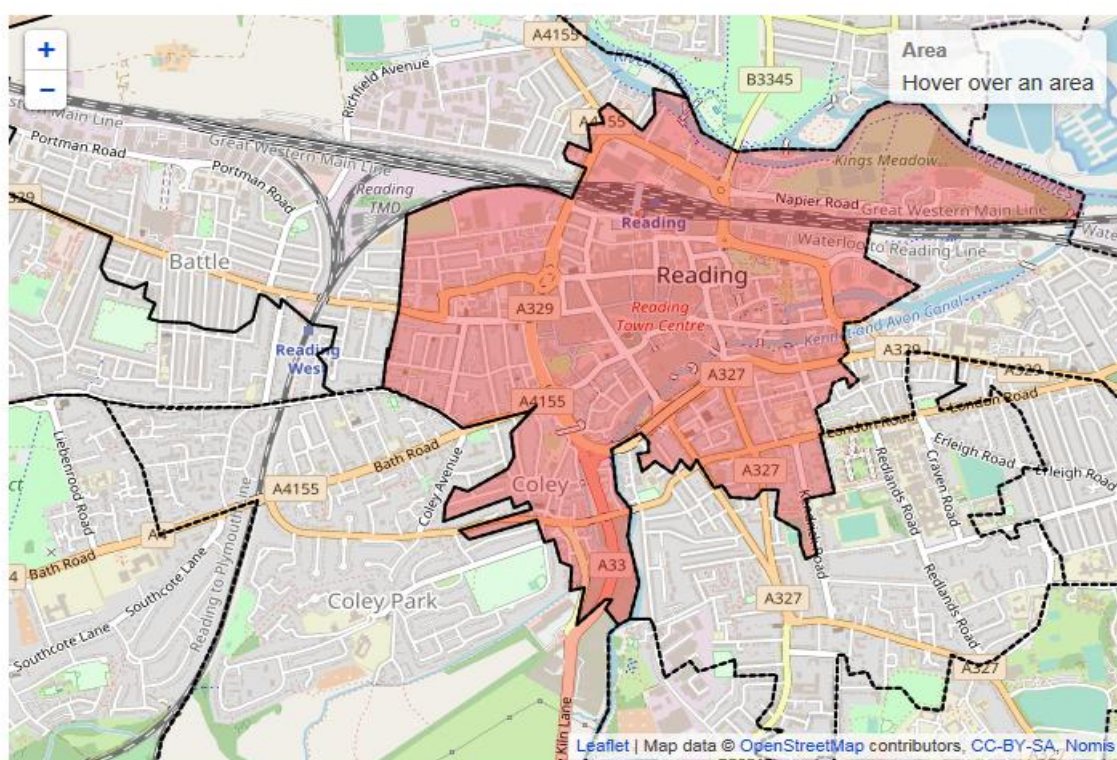
WP703EW - Method of travel to work (2001 specification) (Workplace population)

ONS Crown Copyright Reserved [from Nomis on 2 July 2018]

population
units
area type
area name

All usual residents aged 16 to 74 in employment in the area the
Persons
2011 super output areas - middle layer
E02003399 : Reading 011

Method of travel to work	2011	Percentage
Underground, metro, light rail or tram	127	0%
Train	5,430	17%
Bus, minibus or coach	5,735	18%
Taxi	64	0%
Motorcycle, scooter or moped	216	1%
Driving a car or van	12,511	38%
Passenger in a car or van	1,211	4%
Bicycle	1,263	4%
On foot	5,862	18%
Other method of travel to work	96	0%
Total	32,515	100%



Appendix C

Reading Cycleway Map

Legend



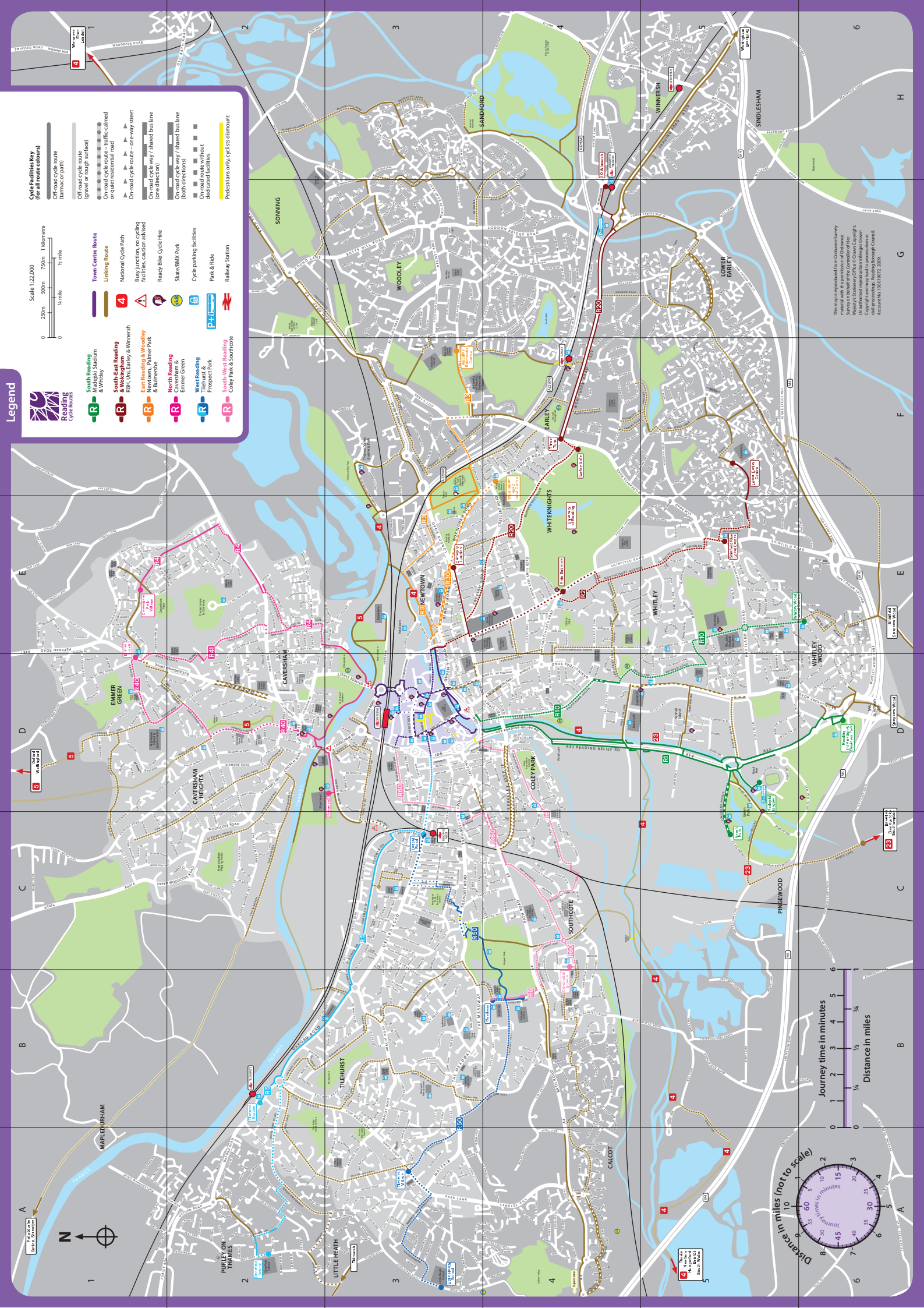
- South Reading**
Marple Stadium & Whitley
- South-East Reading & Wokingham**
Wokingham, Palmer Park & Sandford
- East Reading & Woodley**
Woodley, Palmer Park & Sandford
- North Reading**
Emmer Green
- West Reading**
Prospect Park
- South-West Reading**
Crayke Park & Southgate

- Town Centre Route**
Linking Route
- National Cycle Path**
Buy junction no cycling facilities, caution advised
- Ready Bike Cycle Hire**
- State/BMX Park**
- Cycle parking facilities**
- Park & Ride**
- Railway Station**

Cycle Facilities Key (for all route colours)

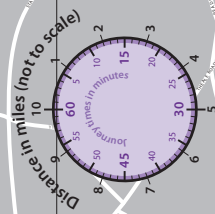
- Off-road cycle route (tarmac or path)
- On-road cycle route (gravel or rough surface)
- On-road cycle route - traffic-calmed or quiet residential road
- On-road cycle route - one-way street
- On-road cycle way / shared bus lane (one direction)
- On-road cycle way / shared bus lane (both directions)
- On-road route without dedicated facilities
- Pedestrians only, cyclists dismount

Scale 1:22,000
0 250m 500m 1 kilometre
0 1/4 mile 1/2 mile



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Journey time in minutes
Distance in miles



Appendix D

Reading Bus Map



jet black	1	pink	22 23 24 25 27 29
lime	2 2a	royal blue	33 33a
leopard	3 X3 10	greenwave	40-60
lion	4 X4	Marecot park & ride	60
emerald	5 6 6a	Winnersh Triangle park & ride	500
scarlet	9	community link	28
bronze	11	other routes	7 7K 60K
orange	12 13 14		
sky blue	15 15a 16		
purple	17		
nineteens	19a 19b 19c		
claret	21 21a		
yellow	26		

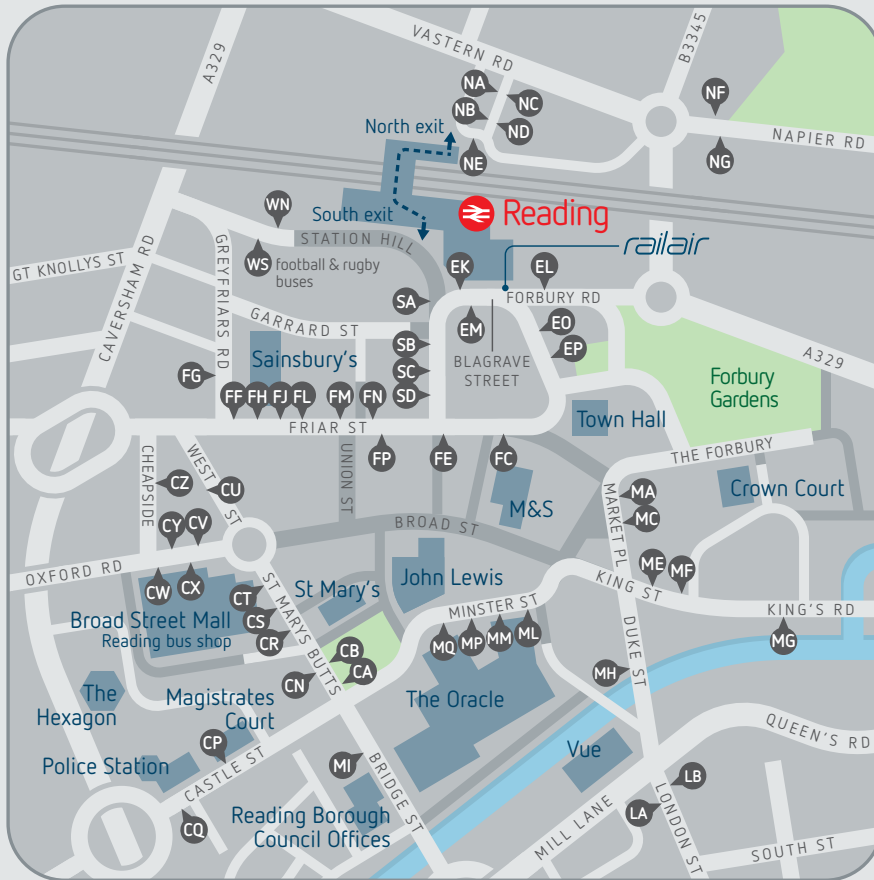
other operators	
Arriva	800 850
Carousel Buses	X80
Courtney Buses	127 128 129
Moretons	TR1
Stagecoach	7 8
Thames Travel	143 X39 X40

Central Reading

to Grazeley, Mortimer & Baughurst TR1
to Swallowfield, Riseley & Fleet 7 7K 8
to Spencers Wood 10

where to catch your bus in Central Reading

Readingbuses



download the Reading Buses app

buy mobile tickets, plan your journey &
get live bus times on your phone



route

jet black	1
lime	2 2a
leopard	3
leopard	X3
lion	4, X4
emerald	5
emerald	6 6a
scarlet	9
bronze	11
leopard	10
orange	12
orange	13 14
sky blue	15 15a
sky blue	16
purple	17
purple	17
nineteens	19a 19b 19c
claret	21 21a
pink	22
pink	23
pink	24
pink	25
yellow	26
pink	27
shuttle	29
royal blue	33 33a
Winnersh Triangle park & ride	500
Mere oak park & ride	60
greenwave	40-60
community link	18 28

towards

Theale/Thatcham/Newbury
Burghfield/Mortimer/Tadley
+ RBH/Arborfield/Wokingham
Shinfield Park (Direct)
College/Wokingham/Bracknell
Northumberland Ave
Whitley Wood/Tesco depot
+ RBH/Shinfield Park
Coley Park
+ RBH/Spencers Wood
College/Woodley Centre
College/Woodley Centre/Woodley/Woodley Green
Tilehurst/Dee Park/IKEA
Purley
College/Wokingham Road (Three Tuns)
College/Tilehurst (Water Tower)
+ RBH/ UoR/Woodley or Lower Earley
UoR/Lower Earley
Caversham Heights
Caversham Park
Emmer Green
Sonning Common/Peppard Common
Calcot
Lower Caversham via Caversham Centre
Lower Caversham
Turnhams Farm/Tilehurst
Winnersh Triangle park & ride
Mere oak park & ride
Kennet Island/Green Park/ Madejski Stadium/RIBP
Purley/Tilehurst Triangle/Caversham/Calcot/ Tesco (Napier Road)

your bus stops

EP FP CA CQ
EP FP CA CQ
CR FM SA MA MF
EP FP
CT FN EO ME
MI CR CU SC MC
MI CR CU SC MC
CR FM SA MA MF
MI CR FM EO MC
CR FM SA MA MF
EM MF
EM MF
FE CX
FE CX
CY FN EO ME
MG MM CN CW
CR FM SA MA MF
CR CU EK MA
FL EL NA
FJ EL NA
FL EL NA
FJ EL NA
EK FP CA CQ
FJ EL
FJ EL
FE CB CQ
MQ CS FM EO MC
CS SD MC
CS SD MC
EP FP CA CB CQ
CU NF NG MP

railair

operated by First

Heathrow Airport

see map

Appendix E

Reading Borough Council Pre-Planning Response

Rosalind Brace
Boyer Planning
Crowthorne House
Nine Mile Rise
Wokingham
RG40 3GZ
rosalindbrace@boyerplanning.co.uk

Our Ref: 171785/PREAPP

Direct: ☎ 0118 937 3625
e-mail: matthew.burns@reading.gov.uk

12 January 2018

Your contact is:

Matt Burns Planning & Building Control

Without prejudice

Dear Rosalind

171785/PREAPP - Second floor rear extension and conversion from offices to nine residential apartments - 108 London Street

This is a pre-application response further to the meeting at the Council offices on 30th November 2017.

Any planning application at the site would be considered within the context of the Council's LDF Core Strategy (2008, Altered 2015) and Sites and the Detailed Policies (2012, Altered 2015) documents. Supplementary Planning documents would also be applied where relevant, together with national guidance (the NPPF). Please use [this link](#) to view the local policies and guidance.

Site description

108 London Street, is a Grade II Listed, late 18th century mid terrace townhouse of three storeys located on the west side of London Street within the Market Place/London Street Conservation Area. The listing describes the building as being built of brick on a stucco plinth. It has stone cills, a flat cornice and parapet, with stone coping under an old tile roof. The windows are glazing bar sash windows, with three-over-six lights on the second floor. The door case has pilasters with shaped bracket caps and open moulded dentilled pediment and a six panelled door and a radiating fanlight.

A large two storey, modern brick extension forming an office block is located to the rear, which is adjoined to the original heritage building via a long, narrow link building and as such forms part of the listed structure.

The site is located within the designated Reading Centre Area as defined by the Reading Central Area Action Plan (RCAAP). The site is also located within an Air Quality Management Area (AQMA) and an area of archaeological potential.

The proposal

The pre-application enquiry seeks advice relating to a proposed second floor rear extension and internal alterations and conversion of the existing building from offices to nine residential apartments.

In summary the proposed works consists of:

- internal re-configuration of rooms and doorways at first, second and third floors within the historic core of the older Building;
- internal re-configuration of rooms and addition of a third storey to the existing two storey rear extension building; and

Relevant Planning History

1956/04570 - Change of use from living accommodation to offices and living accommodation - Granted

1956/04575 - Use of ground floor as offices use of 1st and 2nd 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 2-storey erection to rear of main building and erection of new 2-storey at rear with single Storey link block to main building - Granted

Appraisal

Land Use Principles

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

Whilst the site is not located within the Core Employment Area the loss of the existing employment use must be considered against the criteria set out in Policy CS11 of the Core Strategy (2008, 2015). This states that the following criteria will be used when addressing proposals which would result in the loss of employment land:

- (i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?

- (ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
- (iii) Is there a surplus of a similar size and type of accommodation in Reading?
- (iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
- (v) Is the need for alternative uses stronger than the need for the retention of employment land?
- (vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

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 the 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.

Whilst the proposal could be acceptable in land use principle terms the following material planning considerations are also considered highly pertinent to the suitability of the site for the proposed development.

The proposed works would require applications for both full planning permission and listed building consent.

Design and Impact on the Character of the Conservation Area and Listed Building

The proposals have been reviewed by the Council's Conservation Consultant (including undertaking a site visit internally) whose comments are incorporated within the remarks below.

In summary the proposed internal alterations to the older front part of the building include:

Ground Floor (proposed flat no.3)

- re-configuration including removal of doorways and insertion of new doorways;
- historic fireplace with fire-surrounds would be partly enclosed and bisected by proposed en-suite bathroom and proposed bedroom; and
- historic fireplace with marble fire surround and mantelpiece would be enclosed by a proposed kitchen area

There is a concern with the extent of internal alterations proposed in this part of the building. This is primarily related to the obstruction of existing chimney breast and fireplace to create a bathroom and kitchenette which together with blocking up of an existing doorway from the main entrance hall is considered harmful to the historic character of the listed building. Further to the pre-application meeting it is understood that the layout of the bathroom could be amended to avoid wrapping around the front/rear of the chimney breast whilst the internal layout of flat 3 could be amended to relocate the kitchen to the modern link part of the building which connects to the rear extension. It is

considered that these alterations would result in a development which would better preserve the character (original layout/compartimentation) of the listed building.

First Floor (proposed flat no. 6)

- re-configuration including removal of doorways and insertion of new doorways;
- proposed first floor bedroom with en-suite bathroom area would be located around a historic fireplace and fire-surrounds;
- the proposed main bedroom contains timber panelling and angled fireplace; and
- doorway would be removed and another inserted through this panelling.

Similar to proposed flat no. 3 at ground floor level there is concern with the extent of internal alterations proposed in this part of the building. Removal of the landing doorway and insertion of a new doorway through the wooden panelling in the front room which already has an access door is considered an unnecessary alteration. Whilst the date of the timber panelling is uncertain and further information could be provided in this respect it is considered that inserting additional doors into this area which is already adequately served would be an avoidable alteration which would harm the historic fabric and layout form of the listed building. Again, the bathroom would enclose the fireplace, which should be avoided and associated services should be moved away from enclosing the fireplace. Further to the pre-application meeting I understand the bathroom position could be amended as per proposed flat no. 3 and that the internal layout of flat no.6 is to be reviewed further in an attempt to reduce the extent of door way alterations.

Second Floor (proposed flat no. 9)

- re-configuration including removal of doorways and insertion of new doorways;
- only one surviving basic fireplace and surround; and
- proposed bathroom would not directly affect the surviving fireplace.

There are not many surviving internal features of interest on this floor however the general layout is considered reflective of the historic character of the listed building and as such and as discussed at the pre-application meeting the infilling of the top of stairs to form a landing which separates Flat 9 from the stairs is the preferred neater solution as this would remove the need to re-configure doors within the landing.

There is no objection to the internal alterations (and roof lights) to the proposed to the modern link extension and existing rear two storey building which is a modern addition and not of historic interest, subject use of 'conservation' style roof lights.

Proposed Second Floor Rear Extension

The existing two storey rear extension building dates from the 1980's and is of poor quality design and detailing and is not considered to contribute positively to the setting of the host grade II listed building or to contribute to the character of the Market/Place London Street Conservation Area. The building's hipped concrete tile roof together with the full width bands of windows are considered particularly inappropriate within the conservation area. Despite the poor design of the extension it is lower in height, bulk and massing than the host listed building. The additional of a further storey to

this part of the building would bring its height up to that of the listed part of the building and remove the element of subservience that the existing extension has, as well as increasing the dominance of built development to views within the Conservation Area.

The presence of other and some larger buildings to the rear of the site which also fail to make a positive contribution to the conservation area is noted; however this is not considered to be a justification for further unacceptable forms of development. In this respect Policy CS33 of the Core Strategy (2008, 2015) and the NPPF seek that new development should sustain or enhance the significant of heritage assets. Furthermore, it is noted that Alder House adjacent to the north of the site, whilst not listed, also has a large modern rear extension which is lower in height than the existing rear extension to no. 108, whilst the large single storey outbuilding (no. 112 London Street) located to the rear of no. 110 in use as the 'After Dark' club is also set below the form of the existing extension to no. 108.

It is considered that the additional of an extra storey would further exacerbate the presence of a poor quality building in the conservation area and result in further harm to the setting of the host grade II Listed Building and would be contrary to Policies CS7, CS33 of the Core Strategy (2008, 2015) and Policy RC5 of the Reading Central Area Action Plan (2009).

At the pre-application meeting it was suggested by the applicant that an option for a smaller, set back roof extension to the existing building would be explored. Without seeing plans it is not possible to comment on this option however I would retain concerns regarding an increase in massing of this part of the building as well as how a recessed roof extension would integrate with the existing roof form.

Details of any plant equipment also need to be considered to allow the Council to assess the potential impact of further alterations upon the historic character and form of the listed building. As discussed at the meeting locating plant to the rear modern extension part of the building would be the preferred approach, or ideally out of sight of all public vantage-points, given that this site has two public frontages.

Amenity of Future Occupiers

Policy DM4 of the Site and Detailed Policies Document (2012, 2015) seeks to protect the amenity of future occupiers of development whilst Policy CS34 of the Core Strategy (2008, 2015) seeks to minimise the impact of pollution on proposed developments. Policy RC9 of the Reading Central Area Action Plan (2009) also seeks that new residential development within the Town Centre is adequately protected from surrounding noise and disturbance sources.

The unit sizes proposed are considered to be adequate in size. The units served by windows to the front (onto London Street) and rear (onto St Giles Close) of the building are considered to be served by adequate outlook and daylighting. Similarly those units facing onto the internal courtyard at first and second floor level are also considered to be served by adequate outlook and daylighting. There is concern as to the level of daylighting that would be received by the ground floor units facing onto the internal courtyard given the close proximity of Adler House, in particular the two bedrooms to unit which would have very poor outlook. It is considered that any proposal which includes habitable rooms

facing on to this space should incorporate a day light assessment to these units to demonstrate that the flats would be served by adequate light levels.

In terms of overlooking and privacy policy DM4 seeks that back to back separation distances between windows should be no less than 20m for privacy purposes, but does acknowledge that in certain circumstances windows can be closer without a detrimental impact on privacy. In this instance the proposal would have a 13m separation distance between the first and second floor windows within the courtyard. There is concern as to the closeness of these windows and potential for overlooking within the development in terms of overlooking, however on balance, as a conversion in an urban context this separation is considered adequate.

However, there is concern as to the relationship and closeness of the first and second floor windows of flats no. 6 and 9 to the facing first floor windows of the rear part of Adler House within the courtyard. The rear part of Adler House is set further forward such that the courtyard separation is less at 10m. Officers consider this separation is insufficient and would result in unacceptable overlooking to living room windows and occupiers of flats no. 6 and 9 of the proposed conversion in conflict to Policy DM4.

There is also concern with regard to the 9.6m separation between the facing windows of the ground floor units which is considered to be insufficient and to result in any unacceptable loss of privacy and overlooking. Whilst there is a similar relationship at the adjoining property (Alder House) from the approved plans for this development it appears that not all of the accommodation at ground floor level is habitable, in addition the ground floor relationship was considered to be acceptable for the adjacent conversion on the basis of a 1.8m high screen wall/fence to the ground floor courtyard area which screened direct views between facing ground floor windows. Given the similar relationship to this part of the pre-application property a similar screen would be required to prevent overlooking between the facing ground floor courtyard windows. Any such screen or other privacy mitigation would also need to demonstrate that this would not result in any unacceptable loss of daylight to these units. Notwithstanding the current relationship within the courtyard at Alder House it is my opinion that this would be difficult to demonstrate given the proximity of any screen and enclosed nature of the courtyard which would provide for very poor outlook and conflict with Policy DM4 of the Sites and Detailed Planning Policies Document (2012, 2015).

Following the pre-application meeting held at the Council offices it is understood that the amendments to the ground floor layout discussed in response to the concerns raised by the Council's Conservation Consultant would result in non-habitable rooms/windows to the ground floor link part of the building facing onto the courtyard. On this basis it is considered that obscure glazing and fixed shut windows up to 1.7m in height from internal floor level would prevent any undue overlooking or loss of privacy from this part of the scheme. However, the concerns regarding the front and rear facing windows within the courtyard outlined above would remain.

In terms of noise and disturbance to future occupiers there are concerns as to potential impact from London Street from both commercial and traffic noise to the front of the property and not least the noise/vibration/disturbance from the adjacent 'After Dark' night club at no. 112 London Street which has opening until 2am.

Environmental Protection Officers have been consulted on the pre-application proposal and have raised the following concerns with the development:

- Noise impact on development
- Noise arising from development
- Construction and Demolition phase

They have commented as follows:

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas. The proposed development is next the After Dark night club which we have already received noise complaints about. The noise assessment would have to take this noise source into account by being carried out over a Friday and Saturday night when the club is at capacity.

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.

Where appropriate, the noise assessment data should also include noise events (L_AMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB L _{Aeq} ,8hour	
Living rooms (07:00 - 23:00)	<35dB L _{Aeq} ,16hour	
Gardens & Balconies	<50dB L _{Aeq} ,T	<55dB L _{Aeq} ,T

Applications which include noise generating plant when there are nearby noise sensitive receptors should be also be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology.

Officers also consider that given the closeness of the After Dark club (part of the club abuts the side wall of the building) there will be direct vibration transmission to the building. A vibration assessment should also be submitted to ensure that occupiers of the flats would not be subject to disturbance from the effects of associated with loud/bassy music.

It is considered that noise/disturbance associated with the proximity and late night operation of the adjacent After Dark club is a significant constraint to the proposed development. The noise/vibration disturbance assessments outlined above should be submitted with any subsequent planning application in order for these elements of the scheme to be fully considered. In this instance it is not considered

appropriate that such details could be secured by way of conditions attached to any subsequent planning consent.

Amenity of surrounding occupiers

Policies DM4 of the Sites and Detailed Policies Document (2012, 2015) and RC9 of the Reading Central Area Action Plan (2009) seek to protect the amenity of surrounding occupiers from the impacts of new development. Policy CS34 of the Core Strategy (2008, 2015) seeks to protect surrounding occupiers from the impacts of pollution associated with proposed development.

However, there is concern as to the relationship and closeness of the first and second floor windows of flats no. 6 and 9 to the facing ground and first floor windows of the rear part of Adler House within the courtyard. The rear part of Adler House is set further forward such that the courtyard separation is less at 10m. Officers consider this separation is insufficient and would result in any unacceptable level of overlooking for the occupiers of the rear part of Adler House, in conflict with Policy DM4.

There is also concern with regard to overlooking and loss of privacy to the courtyard windows of the residential units within Alder House from the first and second floor courtyard windows of the proposed pre-application conversion. In particular there is concern with regard to overlooking from the first and second floor windows to the rear of the older part of no. 108 to the facing windows of the rear part of the Alder House building within the courtyard. Due to the forward set of this part of Adler House within the courtyard there are concerns regarding the separation distance between these windows (10m) which it is considered would result in an unacceptable level of overlooking in conflict with Policy DM4. (This is the reverse relationship to that referred to in the 'Amenity of Future Occupiers' section of this letter above).

The existing courtyard relationship within the conversions that have been undertaken at Alder House is acknowledged. However, it is noted that the conversion of the front part of Alder House was permitted with a significant level of obscure glazing to the rear courtyard bedroom windows to mitigate against unacceptable overlooking to the residential conversion already permitted to the rear part of the building. In addition the ground floor rear windows serve a bike store. However, for the proposed conversion at no. 108 the affected windows to flats no. 6 and 9 would serve the primary living areas of these units. In my opinion obscure glazing to these windows would not be an appropriate solution given the living spaces are single aspect and the poor level of outlook to these spaces this would result in.

As such it is considered that the proposals would be detrimental to the occupiers of Alder House in terms of privacy contrary to Policy DM4 of the Sites and Detailed Policies Document (2012 ,2015).

There are concerns about potential noise and dust associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Measures to control noise and dust from the site should be submitted with the application as part of the Construction Method Statement.

A restriction on the hours of construction, demolition and associated deliveries is also recommended to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior approval.

Mix of units

A scheme for 9 units will be guided by Policy RC9 of the Reading Central Area Action Plan in terms of seeking a mix of different sized units. This policy, along with Policy CS15 of the Core Strategy (2008, 2015), seeks to provide for an appropriate range and mix of housing. The mix proposed includes 1 x studio unit, 5 x 1 bed units and 3 x 2 bed units. In my opinion for a scheme of 9 units I would expect to see an element of medium-sized family housing within the development and the inclusion of, as a minimum, 1 x 3 bed unit. Any proposal which failed to provide this would need to be accompanied by a viability assessment clearly demonstrating why family housing could not be included within the proposed development.

Amenity Space

The proposals would not incorporate any specific amenity space, aside from small ground floor terrace areas within the courtyard serving the ground floor units only. Whilst this would not accord with the requirements of Policy DM10 of the Sties and Detailed Policies Document, 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.

Transport Issues

The site is located within the Reading Central Area and within Reading's primary shopping area. The site is located within Zone 1 of the adopted Parking Standards and Design SPD which is an area at the very heart of Reading Borough, consisting primarily of retail and commercial office developments.

This area is well served by rail and bus links and also contains the largest proportion of public car parking spaces. In accordance with the adopted SPD, the development would be required to provide a parking provision of 0.5 spaces per 1-2 bedroom dwelling.

It is noted the proposal would retain 6 existing parking spaces to the rear of the site to serve the proposed two bedroom units with the remaining 4 spaces to be unallocated. Detailed layout of the parking arrangements would need to be provided as part of any application to be submitted.

Given the town centre sustainable location and parking restriction to surrounding roads any under provision of parking is not likely to be contentious. However, I am awaiting comments from our transport officer with regard to this and the layout/access arrangement to the existing parking spaces. Once I have received comments I will forward these on direct separate to this letter.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 0.5 cycle parking spaces for a C3 1-2 bedroom flat which should be in a conveniently located, lockable, covered store. Details of this would need to be provided as part of any application to be submitted.

Any planning application would also be required to be accompanied by details of bin store location/size and collection arrangements.

Policies CS20 and CS24 of the Core Strategy 2008, 2015 and Policy DM12 of the Sites and Detailed Policies Document 2012, 2015.

Natural Environment

A preliminary ecological appraisal to include a nesting bird survey and a preliminary bat roost assessment would be required to be submitted with any application to extend these buildings (Policy CS36 of the Core Strategy 2008, as amended 2015 applies).

Sustainability

The proposal would need to demonstrate how it had been designed to incorporate measures to adapt to climate change in accordance with Policy DM1 of the Sites and Detailed Policies Document 2012, 2015 and Policy CS1 of the Core Strategy.

In accordance with the Council's Sustainable Design and Construction SPD (2011) the proposal would need to demonstrate 'very good' standard for the BREEAM Residential Refurbishment Certificate. If it is not considered that this standard could be met, then justification for this should be provided as part of any application along with an indication of the standard that could be reached.

Affordable Housing

West Berkshire District Council and Reading Borough Council applied for a judicial review of the Secretary of State's Written Ministerial Statement (WMS) to Parliament in 2014 on changes to national planning policy. Those changes sought to exempt developments of 10 or less dwellings from planning obligations for affordable housing and social infrastructure contributions and to introduce a new measure known as the Vacant Building Credit.

The High Court handed down its judgment on the case on 31st July 2015. The High Court found in favour of the challenge by the local authorities and quashed the amendments to the NPPG. The Secretary of State appealed the judgment and the Court of Appeal then quashed the decision of the High Court.

At its meeting of the Strategic Environment Planning and Transport Committee on 13th July 2016, the Council discussed the outcome of the Court of Appeal's decision on its challenge (http://www.reading.gov.uk/media/5651/Item09-SEPT-C-Report-on-C-of-Appeal-judgement-05-16/pdf/Item09_SEPT_C_Report_on_C_of_Appeal_judgement_05_16.pdf).

Having considered its options, the Committee agreed the following as the basis for determining planning applications where Policy DM6 of the SDPD is relevant:

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 (i.e. not HMOs), or the replacement of dwellings by the same number of replacement dwellings where there is no net increase.

Whilst the proposal relates to the conversion of an existing property a significant extension is proposed to the rear which facilitates provision of two of the nine flats. On this basis Policy DM6 is applied to the units not forming part of the conversion only and as such in this respect is considered as a scheme for the formation of two new dwellings which would attract an equivalent contribution for provision of 10% of the housing to be provided off-site elsewhere in the Borough (the required contribution would equate to 5% of the GDV of the two units within the extension).

If any subsequent application would not comply with the requirements of DM6 in terms of affordable housing provision or contributions then this would need to be supported by a comprehensive viability appraisal. Content of a viability assessment should reflect that outlined under Item 27 of the Councils Validation Checklist ([Council's website](#)).

As the consideration of viability appraisals by the Council often involves negotiation and can be time consuming we advise that applications where viability is going to be an issue should be submitted as a pre-planning application enquiry. Applicants who submit planning applications without doing pre-app but rely on a viability appraisal to justify not complying with policy will be required to pay the Council's costs for considering the document (for an equivalent scheme of 2 dwellings this fee would be £2500).

Community Infrastructure Levy

From April 1st 2015 development will be subject to the Council's Community Infrastructure Levy (CIL), and this will include charges for residential development.

Further information on CIL is available to view on the Council's website at: <http://www.reading.gov.uk/businesses/Planning/planning-policy/community-infrastructure-levy/>

The additional floor space within the proposed extension would be liable for CIL, charged at a rate of £120/sq.m (subject indexation). The existing floor space within the building would also be liable unless it can be clearly demonstrated that each part of the building has been in use for a continuous period of at least six months within the past thirty six months.

Conclusion

In order for officers to be able to support this proposal it is considered that a number of revisions would be required in terms of the internal layout of units within the older part of the building as outlined in the assessment above, due to current concerns for unsympathetic interventions into the fabric of this structure, adversely affecting its character and architectural significance. Whilst there are also significant concerns regard the proposed second floor extension which is considered harm to the setting/character of the listed building and character of the surrounding conservation area contrary to Policy CS33 of the Core Strategy 2008, 2015.

There are also significant concerns with regard to outlook and privacy within the proposed development itself as well as privacy and overlooking to the adjoined property at Alder House which it is considered would conflict with Policy DM4 of the Sites and Detailed Policies Document 2012, 2015.

Additional information is also required in respect of daylighting, noise/vibration and disturbance in accordance with Policies DM4, RC9 and CS34 to overcome concerns raised.

Other issues outlined in respect of unit mix, sustainability, bat survey, bin/storage and affordable housing also need to be addressed.

Given the above it is not considered that officers could not support a planning application for the proposal in its current form.

Whilst not encouraged, if you were to submit an application of the nature shown at present, please note the validation requirements set out in the Validation Checklist (updated July 2015). Please refer to the [Council's website](#) for details.

This advice is given on a without-prejudice basis and not all policies have been considered. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. If you wish to discuss the contents of this letter, please contact me on the number given above.

Yours sincerely,

Matt Burns

Matt Burns

Senior Planning Officer

Appendix F

TRICS Output – Residential Flats

LIST OF SITES relevant to selection parameters

The 'browse and select' feature in TRICS was used to choose the sites to be included in this selected set. The TRICS user browsed the full list of sites for this land use category and selected directly from this list.

1	ES-03-D-05 WALWERS LANE	BLOCKS OF FLATS		EAST SUSSEX
	LEWES Town Centre Built-Up Zone			
	Total Number of dwellings:	24		
2	HC-03-D-04 ROMSEY ROAD	BLOCK OF FLATS		HAMPSHIRE
	WINCHESTER Edge of Town Centre Residential Zone			
	Total Number of dwellings:	23		
3	KI-03-D-01 THE BITTOMS	BLOCKS OF FLATS		KINGSTON
	KINGSTON Edge of Town Centre Built-Up Zone			
	Total Number of dwellings:	15		
4	TV-03-D-01 GRANGE ROAD	BLOCKS OF FLATS		TEES VALLEY
	MIDDLESBROUGH Edge of Town Centre Built-Up Zone			
	Total Number of dwellings:	61		
5	WY-03-D-01 NORTH STREET LOVELL PARK LEEDS	BLOCKS OF FLATS		WEST YORKSHIRE
	Edge of Town Centre Built-Up Zone			
	Total Number of dwellings:	45		
6	WY-03-D-02 REYHILL GROVE	BLOCKS OF FLATS		WEST YORKSHIRE
	BRADFORD Edge of Town Centre Built-Up Zone			
	Total Number of dwellings:	44		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

Motion High Street Guildford

Licence No: 734001

TRIP RATE for Land Use 03 - RESIDENTIAL/D - AFFORDABLE/LOCAL AUTHORITY FLATS

MULTI-MODAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	35	0.047	6	35	0.080	6	35	0.127
08:00 - 09:00	6	35	0.071	6	35	0.132	6	35	0.203
09:00 - 10:00	6	35	0.104	6	35	0.137	6	35	0.241
10:00 - 11:00	6	35	0.090	6	35	0.123	6	35	0.213
11:00 - 12:00	6	35	0.090	6	35	0.118	6	35	0.208
12:00 - 13:00	6	35	0.090	6	35	0.146	6	35	0.236
13:00 - 14:00	6	35	0.127	6	35	0.118	6	35	0.245
14:00 - 15:00	6	35	0.066	6	35	0.066	6	35	0.132
15:00 - 16:00	6	35	0.071	6	35	0.094	6	35	0.165
16:00 - 17:00	6	35	0.146	6	35	0.104	6	35	0.250
17:00 - 18:00	6	35	0.118	6	35	0.104	6	35	0.222
18:00 - 19:00	6	35	0.118	6	35	0.099	6	35	0.217
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.138			1.321			2.459

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	15 - 61 (units:)
Survey date date range:	01/01/00 - 10/10/14
Number of weekdays (Monday-Friday):	6
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Motion High Street Guildford

Licence No: 734001

TRIP RATE for Land Use 03 - RESIDENTIAL/D - AFFORDABLE/LOCAL AUTHORITY FLATS

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	35	0.000	6	35	0.000	6	35	0.000
08:00 - 09:00	6	35	0.000	6	35	0.000	6	35	0.000
09:00 - 10:00	6	35	0.005	6	35	0.000	6	35	0.005
10:00 - 11:00	6	35	0.000	6	35	0.005	6	35	0.005
11:00 - 12:00	6	35	0.000	6	35	0.000	6	35	0.000
12:00 - 13:00	6	35	0.000	6	35	0.000	6	35	0.000
13:00 - 14:00	6	35	0.005	6	35	0.000	6	35	0.005
14:00 - 15:00	6	35	0.000	6	35	0.005	6	35	0.005
15:00 - 16:00	6	35	0.000	6	35	0.000	6	35	0.000
16:00 - 17:00	6	35	0.000	6	35	0.000	6	35	0.000
17:00 - 18:00	6	35	0.000	6	35	0.000	6	35	0.000
18:00 - 19:00	6	35	0.005	6	35	0.000	6	35	0.005
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.015			0.010			0.025

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter summary

Trip rate parameter range selected:	15 - 61 (units:)
Survey date range:	01/01/00 - 10/10/14
Number of weekdays (Monday-Friday):	6
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

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Motion High Street Guildford

Licence No: 734001

TRIP RATE for Land Use 03 - RESIDENTIAL/D - AFFORDABLE/LOCAL AUTHORITY FLATS

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	35	0.080	6	35	0.217	6	35	0.297
08:00 - 09:00	6	35	0.170	6	35	0.458	6	35	0.628
09:00 - 10:00	6	35	0.217	6	35	0.311	6	35	0.528
10:00 - 11:00	6	35	0.236	6	35	0.236	6	35	0.472
11:00 - 12:00	6	35	0.236	6	35	0.340	6	35	0.576
12:00 - 13:00	6	35	0.189	6	35	0.283	6	35	0.472
13:00 - 14:00	6	35	0.231	6	35	0.302	6	35	0.533
14:00 - 15:00	6	35	0.292	6	35	0.222	6	35	0.514
15:00 - 16:00	6	35	0.288	6	35	0.245	6	35	0.533
16:00 - 17:00	6	35	0.349	6	35	0.231	6	35	0.580
17:00 - 18:00	6	35	0.448	6	35	0.203	6	35	0.651
18:00 - 19:00	6	35	0.259	6	35	0.179	6	35	0.438
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.995			3.227			6.222

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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