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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning, Heritage Impact, Design & Access Statement

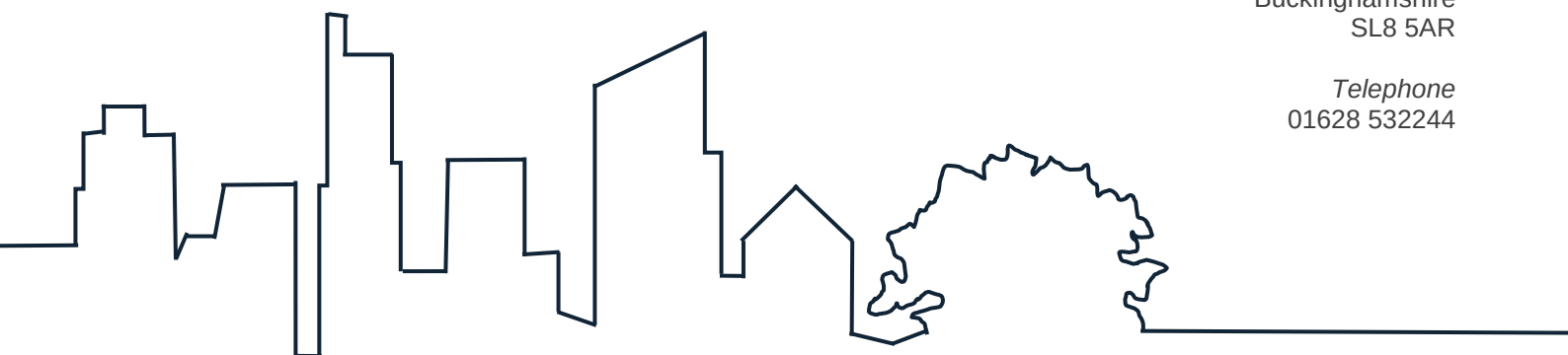
1-2 Market Place, Reading RG1 2EQ

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1. INTRODUCTION

- 1.1 Walsingham Planning has been instructed by The City Pub Group PLC to submit applications for planning permission and listed building consent at 1-2 Market Place, Reading for the following development:

“Change of use of building from a bank (Use Class A2) and offices (Use Class B1a), to a food hall with bars (Use Class A3/A4) at ground floor level with 24 guest bedrooms (Use Class C1) at 1st and 2nd floor levels; alterations at second floor level to create roof terrace.”

- 1.2 An advertisement consent application will follow if required.
- 1.3 This report has been prepared based on a site inspection, an analysis of relevant policy documents, and provides the background information on the site and an assessment of the proposals in relation to planning policy and other material considerations.
- 1.4 The applications are also made following a pre-application enquiry with Reading Borough Council and a meeting on site with Matthew Burns to discuss the proposals.
- 1.5 This report is set out under the following sections:
- Chapter 2 provides the factual background to the site;
 - Chapter 3 sets out the proposals;
 - Chapter 4 sets out the relevant planning policy and guidance;
 - Chapter 5 discusses the planning issues, and provides a Heritage Statement; and
 - Chapter 6 sets out our conclusions.

Supporting Information

1.6 This Planning, Design & Access Statement includes a Heritage Impact Assessment and should be read in conjunction with the following documents submitted in support of the application:

- Site plan
- Existing and proposed plans, elevations, and sections
- Mood boards
- Management Plan
- Noise report
- Drawings, data sheets, specification details of the proposed plant
- Odour Control Assessment

2. SITE & SURROUNDINGS

- 2.1 The site to which this application relates is 1-2 Market Place, Reading. The site is entirely occupied by an existing building arranged over 3 storeys, formerly in use as a bank and offices. The building also benefits from a basement level, and a part-third floor level within the roof at the front of the property. A plant room and lift overrun is at roof level at the rear.
- 2.2 The building is Grade II listed and lies within the Market Place Conservation Area. The front façade is original and retains most of its original character and features, however the remainder of the building behind the original façade is modern and unremarkable in its appearance, both internally and externally.



Front elevation

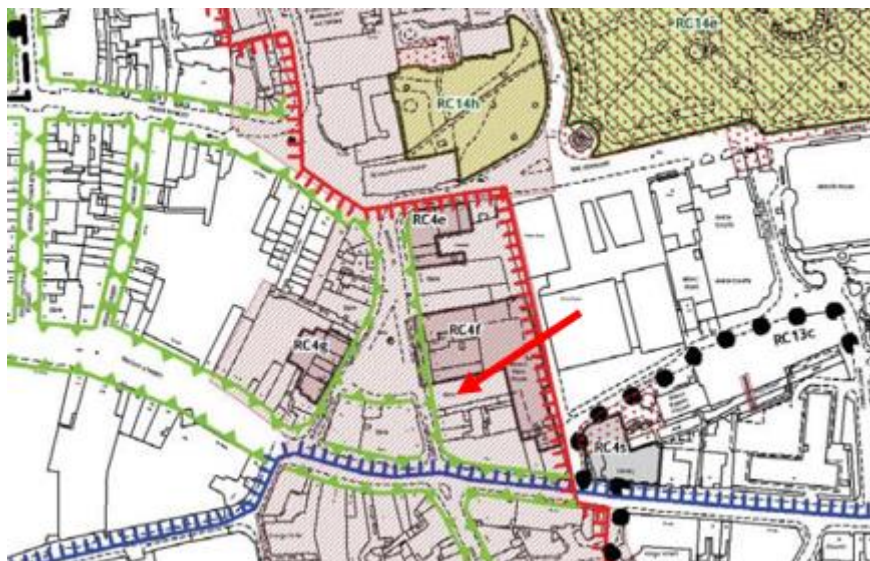


Side (south) elevation and adjoining alleyway

2.3 The building was listed in December 1978, and the listing description is as follows:

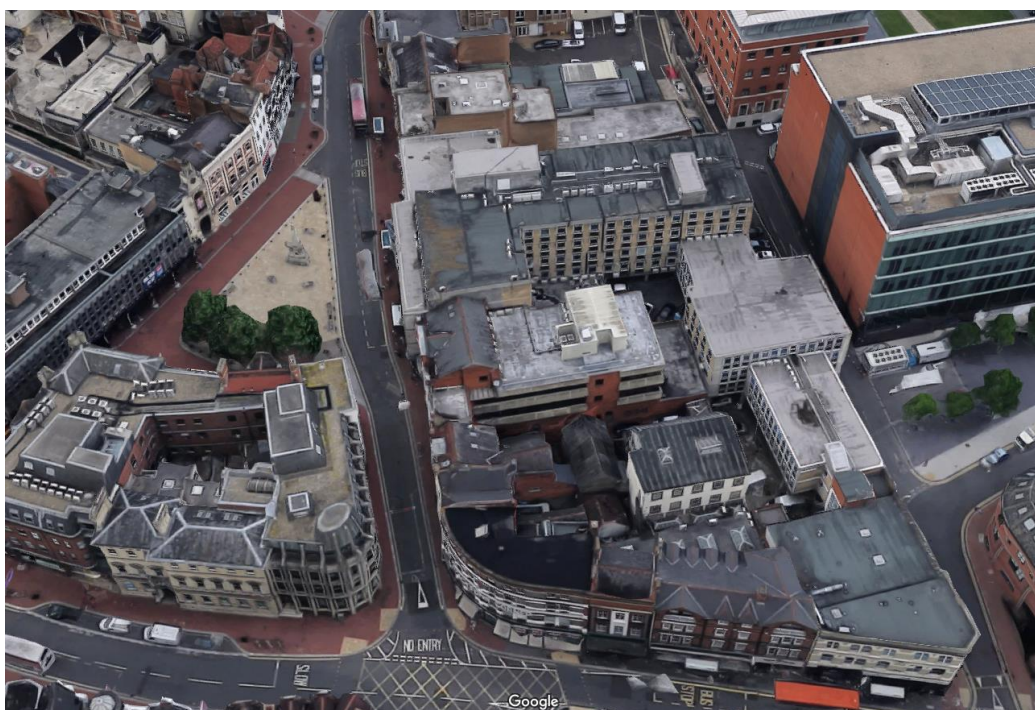
MARKET PLACE 1. 5128 (East Side) Nos 1 and 2 SU 7173 SE 3/531 II GV 2. Probably 1870s. Rubbed brick classical. 5 bays. Dividing Doric pilasters with reed-fluted pilasters over ground floor. 3 storeys with pedimented feature to attic in 2nd bay from left. Moulded and carved modillion cornice, interrupted by shaped pediment over 2nd floor windows of feature bay. Slate roof. Plate glass sash windows, 3 tripartite, feature bay has paired windows. Moulded architraves and enriched entablature on 1st floor. Cast iron parapet rails with semi-circular capped dies. Lunette to feature bay with reed-fluted bracket pilasters. Stone faced ground floor with rustic piers between bays. Large entrance to left in pink and grey polished granite, Segmental pediment, carved tympanum, bracket-pilasters with reed fluted tops. Arched fanlight over modern door. Arched through passage to right with wrought iron guille to upper part carrying "Lloyds Bank Chambers" in gilt letters. Interior has 4 bay classical (circa 1930s) banking hall with 3 Rain beams on central row of piers

2.4 The site lies within the designated Primary Shopping Area, Central Core, and the west (front) elevation is a designated Existing Active Frontage.



Extract from the Reading CAAP Proposals Map showing the application site

- 2.5 The building is east-west orientated, with its western (front) elevation fronting Market Place. To the north is a mixed use building comprising retail at ground floor level (Tesco) with offices above. To the south is another mixed use building with retail at ground floor level. Adjacent to this building is the Jackson's Corner building and redevelopment currently taking place at the site which, when built, will introduce new residential development 'behind'.



Aerial image of Market Place

- 2.6 Built in the 1870s it underwent significant remodelling in the 1930s and again in the late 1970s / early 1980s. With the exception of the front façade which has been retained, the rest of the building dates from the late 1970s / early 1980s and is typical of its era in terms of design, appearance and construction. The main building is a of modern concrete and steel construction, and features large open plan floor slabs interspersed with columns. The building now sits vacant, having been vacated in 2016.
- 2.7 The basement of the building comprises storage rooms, bank vaults, and staff areas including toilets. It is smaller than the floors above, extending under only part of the footprint.
- 2.8 The ground floor of the building retains the proportions of a large room, in use as a banking hall since the 1930s.



The banking hall at ground floor level

- 2.9 Investigative works inside the suspended ceiling and the beams within the banking hall show that these decorative beams and pillars are of a plaster cast composition, likely added when the building was rebuilt in the late 70s / early 80s.
- 2.10 The modern concrete ceiling and concrete beams which forms the structure of the building sit above these decorative plaster cast 'beams' and the suspended ceiling. Metal straps have been attached to the concrete structure and the plaster cast boxing is suspended from the concrete beams above.

- 2.11 These decorative elements are not structural and they do not extend all the way up to support the structure above, they stop at the suspended ceiling and there is a sizable space between the top of these boxes and the building's concrete structure above. A scaffolding-type system supports the suspended ceiling, the plaster cast boxes, and services running throughout.
- 2.12 The photographs below show the space between the suspended ceiling and the floor slab above, the hollow interior of the plaster cast boxes, and the metal support structure supporting the decorative beams along with the suspended ceiling. Text on the side of some of these boxes suggests they were manufactured off site.



- 2.13 These elements are a modern (1980s) replica of the 1930s banking hall, as opposed to being original historic fabric. These plaster cast 'beams' are recent non-structural decorative additions and are simply suspended from the modern concrete frame above.

- 2.14 Lastly at ground floor level at the rear of the building is a single storey element which houses the bank vault.
- 2.15 At first and second floor levels are a series of modern internal partitions and subdivisions associated with its former use as offices.



The office accommodation at first and second floor level

- 2.16 The building benefits from two lift and stair cores, one at the front and one at the rear. At roof level is a small third floor level at the front of the building, and a full height 'box' which houses plant and machinery. Additional plant and a/c units are located on the open roof between these two elements of massing.



Roof level, looking towards the third storey of the building (left)

- 2.17 The side (south) elevation at ground floor level has direct level access to the adjacent alleyway, which provides a means of servicing the building and a means of escape in an emergency via the gated archway onto Market Place.

Relevant Planning History

- 2.18 A planning application was withdrawn in 2016 (ref. 161015) for the “*Change of use of basement and ground floor from financial and professional services (Class A2) to restaurant and café (Class A3) and associated works, including replacement rooftop plant, two grills to ground floor side (south) elevation and flue on rear elevation from first floor to roof level*”.
- 2.19 Permission was granted on 02/02/2006 for the “*change of use of 1st, 2nd and 3rd floors from ancillary bank use to Class B1 (offices)*”.

- 2.20 Permission was granted on 16/09/05 for the *“introduction of 2 no. cash tills through a recently constructed plasterboard partition at ground floor level.”*
- 2.21 An application was withdrawn 28/07/05 for *“internal alterations and introduction of cash machines”*.
- 2.22 Planning permission & listed building consent were granted on 12/01/2000 for the *“change of use from A2 Bank to A3 Food & Drink, with single storey extension to rear at first floor and external alterations”*.
- 2.23 There are numerous applications for signage and cash machines, and internal alterations & repairs.
- 2.24 In the late 1970s / early 1980s the building was extensively remodelled, with the modern steel and concrete-framed building present today constructed behind the retained façade.

3. PROPOSED DEVELOPMENT

- 3.1 It is proposed to change the use of the building from a bank and offices to a food hall with bars (a mixed A3/A4 Use offer) at ground floor level, with 24 guest bedrooms above at 1st and 2nd floor levels (a Class C1 hotel use). A smaller bar and roof terrace will be created at roof level.
- 3.2 The existing building will be retained. No significant external alterations are proposed to the front façade of the listed building. Here, external alterations are limited to new signage and the fitting of secondary glazing to the hotel bedroom windows, in addition to the necessary repairs and restoration to address the dilapidation of the building.
- 3.3 On the modern building behind, the changes are focused in three key areas: 1) alterations to the windows to the hotel bedrooms, 2) the creation of a terrace at roof level, and 3) the cutting back of the roof slab to the existing bank vault at the rear of the building at ground floor level.
- 3.4 The aim is to create a unique venue that takes full advantage of the prime, central location the site occupies, and highlights the various features of the building in a style sympathetic to the history of the local area.
- 3.5 The venue will have a wide-ranging appeal to a broad spectrum of customers, befitting its position in the heart of Reading and proximity to Reading Station, a major transport hub and interchange.
- 3.6 The degree of flexibility incorporated into the operation will ensure the feel is kept fresh and in tune with modern sensibilities. Operationally, the venue will be divided into three trading areas – the ground floor marketplace and food hall, the hotel rooms at 1st and 2nd floor level, and the sky bar and terrace at 3rd floor level.

Basement level

- 3.7 The existing basement will be utilised to provide a cellar, toilets for customers, and a small staff office. The customer-facing area at the front of the building (the WCs) will be accessed via the front stair and lift core.

Ground floor level

- 3.8 The ground floor will be remodelled to provide the main food and drinking hall. It will involve the removal of the modern partitions, suspended ceilings, and decorative plaster cast moulding on the ceiling to create a room which retains the scale and grandeur of the banking hall space.

-
- 3.9 The proposal is essentially an extension of the Market Square on which the building sits. The intention is to create a permanent internal food market with a modern twist. The venue will feature a permanent, artisanal bakery, café, and pizza stall (all one stall), plus three further stalls that will rotate regularly to allow an ever-changing range of Streetfood-style food offers that can be altered as the seasons and consumer trends dictate.
- 3.10 These stalls will have a very defined niche, such as vegan food, Asian curries, gourmet burgers, smoked meats etc, and offer small, focussed menus with an emphasis on quality, healthy options that are quick to prepare.
- 3.11 The bakery will open for breakfast for hotel guests as well as non-residents, and provide a selection of breads, pastries, brunch items, gourmet sandwiches, authentic pizzas, hot beverages, and juices/smoothies. This area at the front of the building – which does not feature a bar – will be open from 7am, whilst the rest of the ground floor will open at 11am.
- 3.12 There will be a main bar featuring a range of independent cask and craft beers, a carefully curated wine list, a wide range of premium spirits and cocktails, and healthy smoothies and juices. In addition, there will be a second satellite bar that can be changed and which will be focussed on a particular product (e.g. gin bar or cocktail bar).
- 3.13 The emphasis is on flexibility, so a group of friends can all sit together and enjoy food from whichever kitchen (or kitchens) they choose, mix and matching as they wish.
- 3.14 All of the stalls and bars will open out onto the central area which will create the marketplace feeling, an extension of the existing market outside. The central area will consist of seating with lots of nooks and crannies, so guests can choose to sit in a busy, buzzing atmosphere, or a quieter laid back atmosphere.
- 3.15 In addition to the central seating area, there will be a mezzanine level over the centre of the room, which will give customers a birds-eye view of the hustle and bustle below. This could also be used as a private area for functions and will also be used to hold a programme of events and classes such as healthy living, meditation, and cocktail masterclasses.
- 3.16 The rear of the ground floor will see the former bank vault transformed into a secret garden with a retractable roof, a small open area for al-fresco drinks and dining.
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Examples of what the food hall may offer

First and second floor levels

- 3.17 The first and second floors will be a separate distinct operation from the ground floor offer, and will be for the exclusive use (and access) of hotel residents only. The upper floors will be capable of being occupied separately to the ground floor, including a separate entrance and staircase.
- 3.18 It will consist of 24 boutique rooms, all en-suite and furnished in a contemporary, design-led style. There will be a mix of 1-bed and 2-bed rooms, including accessible bedrooms. The rooms will be wide-ranging in terms of their appeal and will be perfectly suited equally to business travellers and those enjoying a leisurely break. Each room will feature facilities such as TVs and bar fridges, and wifi will be available throughout.
- 3.19 The proposal also provides accommodation for a manager, ensuring there will be a responsible member of staff on-site at all times. This is a single room of non self-contained ancillary residential, accessed from within the 'hotel' area of the building.
- 3.20 A number of rooms on the south elevation will feature obscure glazing and fixed internal louvres within the rooms to ensure there is no opportunity for overlooking of the properties under construction to the south.



Examples of what the bedrooms may look like

Third floor level

- 3.21 Within the small third floor level it is proposed to create an intimate cocktail bar, opening out onto an external roof terrace which is furnished with seating booths. The bar will have a sophisticated feel, in keeping with what is expected of a premium boutique hotel such as one of the Soho House venues. The bar will be available to both hotel guests and non-residents, and can be accessed from all floors by both lift and staircase. It will be available for private hire for special occasions.



Examples of the look and feel of the roof terrace

- 3.22 A 2500mm in height visual and acoustic screen will be installed along the edge of the terrace, positioned so that it is pulled back from the parapet and enclosing the external seating area from the properties under construction to the south. This screen features a sloping roof, part-enclosing the terrace and the booths underneath.

4. PLANNING POLICY

- 4.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise.
- 4.2 In this instance the Development Plan comprises Reading's Core Strategy (adopted in 2008, updated in 2015), Reading's Sites and Detailed Policies Document (adopted in 2012, updated in 2015), and Reading's Central Area Action Plan (adopted 2009). The Market Place/London Street Conservation Area Appraisal is also of relevance.
- 4.3 Reading submitted their new Borough Local Plan to the Secretary of State in March 2018. At the time of writing the new policies have not yet undergone independent examination and the policies therefore carry only limited weight for the purposes of decision making. Nevertheless, the document is at a relatively advanced stage and provides an indication of the direction of travel for the Borough.
- 4.4 The policies and guidance considered relevant to the determination of the application are set out below.

National Planning Policy Framework

- 4.5 The National Planning Policy Framework (NPPF) was published in March 2012. It sets out the Government's intention for the planning system to contribute to the achievement of sustainable development, performing an economic, social and environmental role.
- 4.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14) which for decision-taking means that development proposals that accord with the development plan should be approved without delay.
- 4.7 The NPPF sets out how there are three dimensions to sustainable development: economic, social, and environmental. There is a need for planning to contribute to building a strong, responsive and competitive economy. Investment in business should not be over-burdened by planning policy expectations.
- 4.8 Paragraph 17 sets out a series of core planning principles, and includes a requirement to proactively drive and support sustainable economic development to deliver the homes, businesses, infrastructure and thriving places that the country needs; and a requirement to

conserve 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.

- 4.9 Paragraphs 18 and 19 explain that the Government is committed to securing economic growth in order to create jobs and prosperity with significant weight being placed on the need to support economic growth.
- 4.10 Section 7 of the NPPF promotes the importance of good design of the built environment to make places better for people. Paragraph 57 states that it is important to plan positively for the achievement of high quality and inclusive design for all development.
- 4.11 Paragraph 58 requires planning decisions to ensure that development establishes a strong sense of place, creating attractive and comfortable places to visit. It looks to optimise the potential of sites and ensure they are visually attractive.
- 4.12 Paragraph 70 of the NPPF states how *“to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments*
 - *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”*
- 4.13 With regards to Heritage Assets, paragraph 128 states that *“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*
- 4.14 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 vitality; and*

- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

4.15 Paragraph 132 continues, stating that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Paragraph 134 states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

4.16 Finally, paragraph 187 of the NPPF deals with decision making and states that: “*Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area*”.

Reading's Core Strategy

4.17 Policy CS5 concerns Inclusive Access and states that “*all buildings should be located, sited and designed to provide suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.*”

4.18 Policy CS7 concerns Design and the Public Realm and states:

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials*

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives:

- *Character - a place with its own identity and sense of place*

- *Continuity and enclosure*
- *Quality of the public realm*
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*
- *Adaptability – capable of adaptation over time*
- *Diversity – meets a wide range of needs.*

Developments will also be assessed to ensure that they:

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them; and*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping*

4.19 Policy CS25 concerns the Scale and Location of Retail, Leisure and Culture Development and states:

Major retail and main town centre leisure and culture development will take place in, or as an extension to, the centre of Reading. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, a sequential approach should be adopted to identifying alternative sites.

All development will comply with the relevant tests for retail, leisure and culture development set out in government guidance

4.20 Policy CS26 sets out the hierarchy of centres – Reading Centre is a ‘Regional Centre’ – and states:

The vitality and viability of these centres should be maintained and enhanced. This will include widening the range of uses, environmental enhancements and improvements to access

Development for main town centre uses in or adjoining these centres should be of an appropriate scale. Where proposed levels of development would be of a greater scale, it should be clearly demonstrated that the catchment the development will serve is in keeping with the role of the centre

- 4.21 Policy CS27 'Maintaining the Retail Character of Centres' states *"a strong retail character will be maintained in the centres identified as being part of the network. Significant groupings of non-retail uses in one part of a centre will not be allowed."*

- 4.22 Policy CS33 concerns the protection and enhancement of the historic environment. It states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located

Reading Central Area Action Plan

- 4.23 Turning to the Reading CAAP, Policy RC5 concerns design in the centre and states:

Applications for development within the Reading central area should demonstrate the following attributes

- a. *Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower*

levels, and contributing towards enhanced ease of movement through and around the central area;

- b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscape, public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;*
- c. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;*
- d. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety*

4.24 Policy RC6 'Definition of the Centre' states:

Retail development will take place in the Primary Shopping Area, as defined on the Proposals Map. The extension to the Primary Shopping Area (RC6b) will be in place once a new pedestrian link is operational across the railway between Caversham Road and Vastern Road.

Major office development of over 1,000 sq m will take place in the Office Core, as defined on the Proposals Map.

Other main town centre uses will take place in the Central Core, as defined on the Proposals Map

4.25 Policy RC7 concerns leisure, culture and tourism in the centre and states:

The Reading Central Area will be the prime focus for major leisure, cultural and non-regionally significant tourism development. These uses should be concentrated within the Central Core, as defined on the Proposals Map. Leisure, cultural and tourism uses that would attract a wide range of people into the centre will be encouraged. Existing leisure facilities that add to the range and offer in the centre will be retained, unless it can be demonstrated that these uses can be provided for on a suitable site within the Central Core. There should be no net loss of the Centre's overall leisure provision

Innovative solutions to leisure provision will be encouraged, particularly those that make best use of available (often limited) site area. The scale and design of the proposal must

not have an adverse impact on the appearance and amenity of the surrounding development

- 4.26 Flowing from RC7, Policy RC8 concerns drinking establishments and states:

A range of complementary evening and nighttime uses that appeal to all sections of Reading's society, and contribute to the 18-hour welcome, will be provided. Such uses should not give rise to adverse impacts on the amenity of nearby residents and other town centre users. Those uses that are likely to have an adverse impact on amenity or the character and/ or function of the Central area, will not be permitted.

The location of drinking establishments (including pubs, bars and nightclubs) will be limited to Reading's Central Core.

Proposals for pubs, bars and clubs should be accessible to current and proposed night-time public transport services.

- 4.27 Market Place is within the defined Central Core.

- 4.28 Policy RC10 concerns active frontages and states:

Uses on the ground floor along the designated active frontages will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors. New developments (or alterations to existing uses) that front onto any of the designated active frontages will provide an active building frontage with a display window or glazed frontage at ground floor level, in order to contribute to the vibrancy of the Town Centre, and provide visual interest.

Frontages should be of a high visual quality. Any frontages that have the potential to hinder movement or cause unnecessary safety risk will not be permitted

- 4.29 Market Place is a designated 'Active Frontage'.

Sites and Detailed Policies Document

- 4.30 Policy SD1 sets out the council's approach to considering development proposals in the context of the presumption in favour of sustainable development contained in the National Planning Policy Framework
- 4.31 Policy DM4 'safeguarding amenity' states:

Development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of:

- *Privacy and overlooking; Access to sunlight and daylight;*
- *Visual dominance and overbearing effects of a development;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell; or*
- *Crime and safety.*

The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.

As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable.

4.32 Policy DM15 concerns the protection of leisure facilities and public houses and states:

Developments that would result in the loss of a leisure facility or a public house outside the Central Area will be assessed against the following criteria: (i)

- (i) Within a defined district, major local or local centre, development involving the loss of a leisure facility or public house will not be permitted where it is the only facility of that type in the centre;*
- (ii) Development involving the loss of leisure facilities or a public house not covered in (i), will not be permitted unless it can be clearly demonstrated that:*
 - a. There is no need for this type of facility in this area; or*

- b. *The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or*
- c. *The impacts on amenity of residents of retaining the facility could not be dealt with through other measures, and would be so severe as to outweigh the benefits to the wider community of retaining the facility.*

Emerging Local Plan

4.33 Of relevance to this application at this stage are a number of policies relating to town centre uses and development within Reading's central core.

4.34 CR4 'leisure, culture and tourism in central Reading' which continues to support such uses which would attract a wide range of people into the centre, and encourages innovative solutions to leisure provision, particularly those that make the best use of available (often limited) site area.

4.35 CR5 specifically concerns drinking establishments and states:

A range of complementary evening and night-time uses that appeal to all sections of Reading's society, and contribute to the 18-hour welcome, will be provided. Such uses should not give rise to adverse impacts on the amenity of nearby residents and other town centre users. Those uses that are likely to have an adverse impact on amenity or the character and/ or function of the Central area, will not be permitted

Proposals for pubs, bars and clubs should be accessible to current and proposed night-time public transport services

4.36 Policy CR7 'primary frontages in central Reading' states:

Uses on the ground floor along the designated primary frontages as shown on the Proposals Map will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors. New developments (or alterations to existing uses) that front onto any of the designated primary frontages will provide an active building frontage with a display window or glazed frontage at ground floor level, in order to contribute to the vibrancy of the town centre, and provide visual interest

Frontages should be of a high visual quality. Any frontages that have the potential to hinder movement or cause unnecessary safety risk will not be permitted

Proposals that would result in the loss of A1 or A2 use such that the proportion of the length of frontage within the street in A1 or A2 use falls below 50% will not be permitted, unless the proposal introduces a use that makes a positive contribution to the overall diversity of the centre.

4.37 The application of the policies and guidance set out above is discussed in the next chapter.

5. PLANNING AND HERITAGE ASSESSMENT

5.1 This chapter of the Planning Statement assesses the development proposals against the national and local planning policy framework and other relevant material planning considerations and considers each main aspect of the proposed development, namely:

- Principle of Development
 - Loss of existing use
 - Proposed use
- Design & appearance
- Heritage Impact
- Amenity
 - Privacy and overlooking
 - Noise
 - Odours
- Transport and servicing
- Access Statement

Principle of Development

5.2 The National Planning Policy Framework (NPPF) promotes sustainable economic development and places substantial weight on re-using sustainably located land and buildings, securing economic growth and creating jobs and prosperity through the planning system. The proposed development would support these aims by adding 24 guest rooms that generate and capture spending in the town centre, and creating a vibrant new food and drink offer, in turn creating jobs when in operation and providing employment during the construction phase.

5.3 The proposed reuse of a vacant building will support the tourism, leisure and business sectors of Reading's economy. The NPPF makes clear that there should be a presumption in favour of sustainable development and that "*development which is sustainable can be approved without delay*" (Paragraph 15). The proposed change of use of the building constitutes sustainable development and should therefore be supported.

Existing Use

- 5.4 The building currently sits vacant, with the ground floor banking use having ceased around July 2016. The A2 Use will be replaced by an A3/A4 Use at ground floor level, continuing the building's 'A'-use class function serving visiting members of the public and maintaining an active frontage in accordance with Policy CS27 and Policy RC10.
- 5.5 Offices are not explicitly protected in this location – subject to an acceptable alternative – and the loss of vacant office floorspace will be replaced with another employment-generating use – directly and indirectly – which will contribute to Reading's economy.
- 5.6 The change of use of the building is acceptable and in accordance with national and local policy on the basis of the nature and type of replacement use proposed.

Proposed Use

- 5.7 Policy RC7 of the CAAP states how the Reading Central Area will be the prime focus for major leisure, cultural and non-regionally significant tourism development. These uses should be concentrated within the Central Core, which this site lies within. Policy RC7 goes on to encourage "innovative solutions to leisure provision" which makes the best use of available (often limited) site area.
- 5.8 Drinking establishments are dealt with by Policy RC8 of the Central Area Action Plan (CAAP), stating that a range of complementary evening and nighttime uses that appeal to all sections of Reading's society, and contribute to the 18-hour welcome, will be provided.
- 5.9 The A3/A4 Use at ground floor level is innovative and will offer a unique food and drink offer, an extension of the food market combined with the provision of bars. It will not be a conventional public house or bar, but rather a series of food franchises and individual bars arranged within a large room – the former banking hall – providing breakfast, lunches, dinners, and a variety of drinks throughout the day.
- 5.10 The ground floor use will introduce vibrancy, animation to the locality, and variation and choice in terms of the food and drink offer in this part of Reading. The uses will complement each other and complement the surrounding area, providing a venue for visitors, workers, and Reading residents to socialise. The role and function of the town centre will be enhanced, supported and maintained.

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- 5.11 At first and second floor level, the guest rooms will be built and managed by The City Pub Group and will be marketed alongside the food hall in order to provide interplay between and boost the business of both operations.
- 5.12 Check in at the guest rooms will be at first floor level, separate from the ground floor use. However, the two uses will be operationally linked with guests using the food hall for breakfast – the ‘café / bakery’ element at the front – and probably for other meals too. This is particularly helpful for business travellers.
- 5.13 The guest accommodation would complement the food and drinking hall as an extension of Market Place outside, and the number of rooms is considered appropriate to the likely market in this central Reading location as well as the size of the building (which is retained). The site is well positioned to provide hotel bedrooms with easy access to Reading town centre and the main railway station which is a short walk away.
- 5.14 The ‘hotel’ element of the proposal is bedrooms only – there is no independent restaurant or function rooms or gymnasium etc. – and it is therefore not a hotel in the conventional sense, but merely the provision of 24 guest rooms above a food hall and drinking venue. Guests comings and goings, and servicing and deliveries, will be part of the wider use of the building.
- 5.15 As discussed above, there are significant benefits to the business and customers through the linked benefits of the co-location of uses. Guest bedrooms, food hall and a drinking venue all complement each other very well.
- 5.16 Policy RC10 or the CAAP concerns active frontages, and states that uses on the designated active frontages – this site is on one such designated frontage – will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses. The proposal falls within these permitted uses, comprising a mix of A3, A4, and C1 throughout the building. A balance needs to be struck between the building’s listed façade and the provision of an active frontage, nevertheless the existing window and door openings will be utilised to create an inviting frontage to attract potential customers.
- 5.17 Policy CS27 seeks to maintain the retail character of centres, which this proposal will do through the provision of the ground floor ‘Market House’ providing breakfast, lunch, dinner, and drinks throughout the day. Furthermore, it will complement and support retail uses throughout the town centre. The retail character of the area will be maintained through this market hall offer, providing an extension of the existing market outside and providing a unique eating and drinking experience.
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- 5.18 Investment in this large building currently sitting vacant in the heart of Reading and which has been the unfortunate victim of vandalism and break-ins in the past is essential, and City Pub Group will be investing a significant financial sum to make the necessary repairs, maintenance and overall high-quality refurbishment of the building, and in doing so creating a business which will provide local employment and contribute economically. These are significant benefits.

The proposal is in accordance with CAAP policies RC8 and RC10 and Core Strategy Policy CS27, and emerging policies CR4 and CR5 in providing a daytime and evening use which retains an active frontage and will cater to a wide variety of customers, complementing the Market Place / Square area and wider the town centre.

Design and appearance

- 5.19 Behind the historic façade the building is of modern steel and concrete frame construction. No significant changes to the building are proposed externally. The building will be cleaned, tidied up, and repaired and restored where necessary (e.g. maintenance to the timber sash windows on the front elevation). At roof level a small extension to the existing plant room is proposed which will house the emergency escape route, an extension to the stair core below.
- 5.20 The front façade will be retained as existing, no significant changes are proposed beyond cleaning and repairs, signage, and discrete lighting to the architectural features of the façade.
- 5.21 Internally, the existing building is made up of modern partitions, fixtures and fittings associated with the bank and office use. The original space of the 1930s banking hall will be retained and utilised to create the centre piece of the building, the ground floor food and drink offer.
- 5.22 The new internal refurbishment and fit out of the food hall and guest accommodation will be of a high-quality construction and appearance. Please refer to the accompanying mood boards for a selection of images of the type and quality of offer which is proposed.

In design terms the changes are largely cosmetic, and are considered to significantly enhance the appearance, function, quality and customer experience of the building. The change of use of the building is in accordance with Core Strategy Policy CS7 and CAAP Policy RC5.

Heritage Impact

- 5.23 Paragraph 128 of the NPPF requires an applicant to describe the significance of heritage assets that are to be affected by the proposal. The level of detail to be provided need be no more than is needed to understand the impact, and proportionate to the asset's importance.
- 5.24 The building is Grade II listed and situated within a Conservation Area. Whilst the original building dates from the 1870s, it was extended south in the 1930s which included the façade being widened from 3 bays to 5 bays (as exists today) and included the internal refurbishment of the building to form a banking hall at ground floor level. The building has been in use as a bank since at least the 1930s.
- 5.25 The front façade of the building has been retained, however the building behind has been rebuilt during redevelopment in the late 70s / early 80s. Behind the façade the building is a modern steel and concrete framed construction, featuring floor slabs supported by evenly spaced columns across all floors of the building.
- 5.26 Internally, and when viewed from the south, the building exhibits an entirely modern character. Very little original historic fabric of the original building remains – this is focused within the front façade, which will not be altered.
- 5.27 The significance of the building primarily lies in the front elevation, and to a lesser extent the large room at ground floor level which has been a banking hall since the 1930s. This is reflected in the listing description, its external appearance being of significance and the interior of the building less so.
- 5.28 To allow the proposed food/drink use to function effectively, it is necessary to strip out and redecorate the ground floor of the building. This space will be retained and reused as the focal point of the building once again. The alterations to facilitate the new use at ground floor level will retain the main space and plan form in this part of the building. The form and shape of this main room will remain largely unaffected by the change – the building is being retained including the floor slabs and columns – and it is necessary to find a new use for this vacant building.
- 5.29 As detailed in Chapter 2 of this document, an investigation by the contractor has demonstrated that the classically-detailed banking hall features present at ground floor level are plaster cast boxes suspended from the modern concrete frame of the building, designed to replicate the appearance of the 1930s banking hall as opposed to being original.
- 5.30 At first and second floor levels no historic fabric or historic plan form is present due to the building's modern construction. There is no heritage impact as a result of the works to create
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- 24 guest rooms, except for the installation of secondary glazing to the sash windows on the front façade to improve the acoustic performance of the rooms.
- 5.31 The character and significance of the Market Place / London Street Conservation Area – first designated in 1972 – focuses on the historic town centre core of Reading, which contains a number of listed buildings and is characterised by a mix of architectural styles and ages of buildings, and a vibrant mix of uses.
- 5.32 The proposed change of use of the building and associated alterations would not harm the significance of this Heritage Asset. The building's function and contribution to the character of the Conservation Area will be maintained – the proposal is compatible with and supports other uses within the Area, whilst at the same time the external façade of the building and its physical contribution to the street scene is maintained.
- 5.33 The proposed alterations are not considered to amount to harm to the heritage assets – the listed building and the Conservation Area – and, while the NPPF only refers to “substantial” and “less than substantial” harm, the latter is, by these limited criteria, certainly applicable.
- 5.34 Indeed, it is considered that the heritage assets, comprising the listed building and the contribution made by the building to the Conservation Area, will be enhanced by the food hall and drink offer and change of use of on the upper floors to guest accommodation, and the works undertaken to effect that change.
- 5.35 The proposal is therefore in accordance with Paragraph 134 of the NPPF when weighed against the significant public benefits of the proposal.
- 5.36 The financial investment in the building being made by the City Pub Group will ensure the Grade II listed building is retained, repaired where necessary, and continued to be put to a viable economic use which is fully compatible with the surrounding land uses in this part of the Conservation Area.
- 5.37 Paragraph 131 of the NPPF states that, in determining planning applications, LPAs 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 vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.”*
- 5.38 Neither the listed building – which is now essentially the front façade – nor its setting would be diminished as a result of the proposed change of use and associated fit-out, and the activity

associated with the hotel / food / drink use on Market Square will contribute to its setting and the character of the Conservation Area. This is a positive change.

- 5.39 The modest external changes will be open and inviting, attracting custom without detracting from the building's appearance or significance. Indeed, given the significance of the building is primarily in its external appearance on the front elevation, what is proposed can be considered an enhancement in terms of its appearance, use, and function.
- 5.40 On balance the changes are considered positive. Any limited ("less than substantial") harm – for example the removal of the modern plaster cast decorative beams at ground floor level or the installation of secondary glazing to the front elevation – is more than outweighed by the public benefits of the wider refurbishment of the building, enhancements to its appearance, and enhancements to its use in contributing to the area. The proposal is bringing an empty building back into use for use by visiting members of the public, in doing so contributing to the character of the Market Square area; this is a public benefit to the building, and to the area.

The proposal is in accordance with Paragraphs 131 & 134 of the NPPF, and Core Strategy Policy CS33.

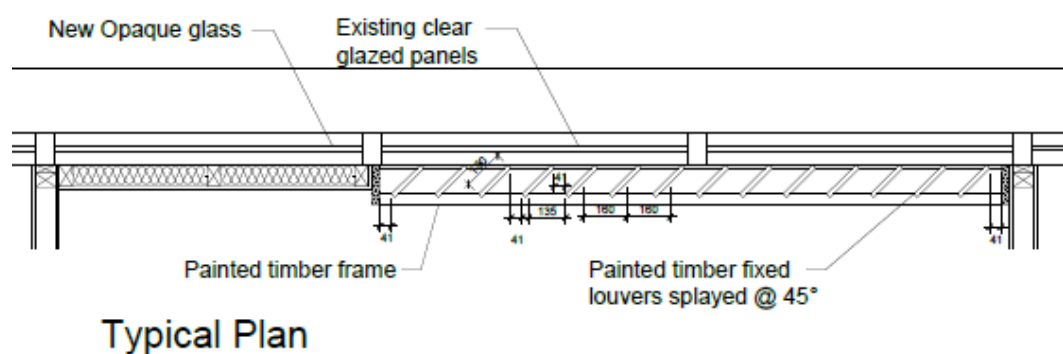
Amenity

- 5.41 This is a constrained site in a busy town centre location, surrounded by a mix of uses and variety of building types, and it is this prevailing character of the area that is the starting point for any assessment of amenity impact. Nevertheless, it is important that new development does not worsen existing situations or introduce new sources of adverse amenity impact.

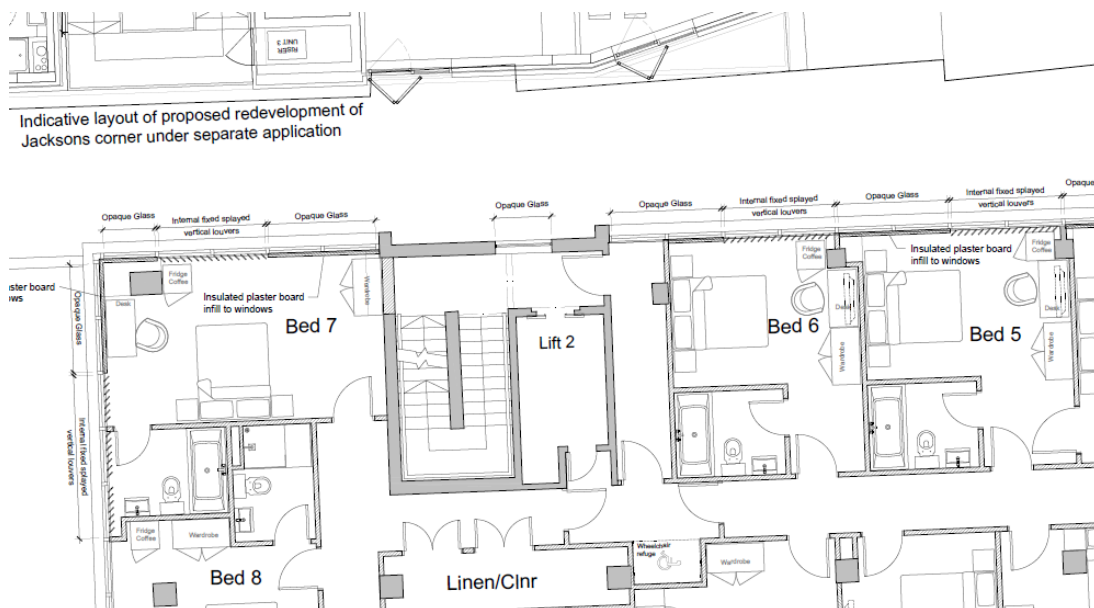
Privacy and overlooking

- 5.42 It should be emphasised how the existing windows within the building are unobscured and run the full length of the building's south and east elevation. An office use arranged across the two upper floors is an intensive use which has the potential to operate throughout the day and evening. Curtainless windows would give rise to overlooking and light spillage.
- 5.43 A hotel use is far more compatible with a residential use, the nature of the types of use are similar as both will wish to have privacy, peace and quiet.
- 5.44 Nevertheless, at the pre-application stage concern was raised at the potential for overlooking of the soon to be constructed (at the time of writing) residential units to the south of the site. In response, the scheme has been developed and architectural devices utilised to ensure there will be no opportunity for loss of privacy or overlooking.

- 5.45 It should be noted that there are not many windows to habitable rooms in the north elevation of the building opposite, which immediately limits the opportunity for amenity impact.
- 5.46 At first and second floor levels a system of fixed vertical louvres is proposed within some of the hotel rooms closest to the building opposite. These architectural devices are full height and integral to the interior design of the room, designed such that an occupant of the room is forced to look in a specific direction. As a result, it is simply not possible to look directly across at any windows to habitable rooms opposite.
- 5.47 The remainder of the window to these rooms will be obscured with internal partitioning to block them off, with opaque glass externally such that the overall appearance of the building externally will be maintained.



- 5.48 The first floor plan on the next page shows which rooms these devices will be installed in, and the direction the louvres will be angled in. From bedrooms 5, 6, and 7 – those which have the potential to affect the windows to habitable rooms opposite – a combination of the position of the obscure glazing (panelling internally) and the angled louvres away from the windows ensures these guest bedrooms will not overlook the windows to habitable rooms opposite. This arrangement is repeated on the second floor above.



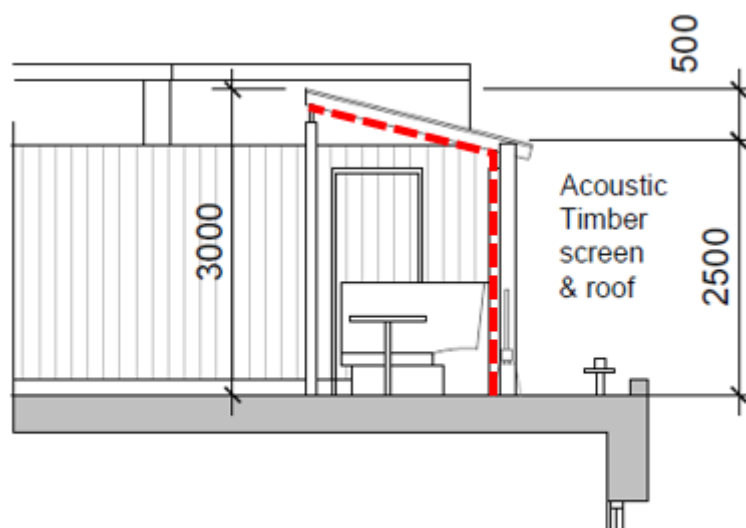
First floor plan showing the angled louvres and obscured windows to rooms 5, 6 & 7

- 5.49 Together, these solutions ensure no windows to habitable rooms in the new development being constructed opposite will be overlooked by the new hotel, whilst at the same time allowing natural light to enter the rooms and provide a good quality of accommodation and amenity for the hotel guests.
- 5.50 Indeed, the situation will be enhanced. As set out above, the existing situation is a poor one and gives rise to the opportunity for overlooking and loss of privacy. Introducing a more compatible residential-style use (i.e. a "C" use class) and upgrading the windows to feature obscure glazing and louvres will significantly reduce – indeed eliminate – any opportunity for overlooking or loss of privacy. The guest bedrooms will have curtains – something the office building does not have – and on arrival in a hotel room a guest would likely have the desire to immediately draw their curtains. The proposed use is more residential in nature where guests would be expected to want privacy.
- 5.51 At third floor level a series of booths has been added to the southern extent of the rooftop terrace area, where the southern elevation is formed by a high screen which will block both views and noise egress. This screening is angled at the top to further reduce any potential for overlooking and noise egress, partially enclosing the space closest to the development to the south.

There will be no opportunity for overlooking or loss of privacy as a result of the mitigation proposed, in accordance with Policy RC7 of the CAAP and Policy DM4 of the Sites and Detailed Policies Document.

Noise

- 5.52 An acoustic report has been prepared by RSK which has informed the development of the design in a number of areas and which provides an assessment of the potential noise impact generated from the development. It considers noise from new rooftop plant, noise egress from customers using the roof terrace, and the façade noise insulation requirements.
- 5.53 With regards to the recommendations of the report within Chapter 10, a partial covering of the terrace is proposed, and acoustic treatment applied to the fence/roof on the southern elevation of the terrace to prevent noise egress.



Section Through Acoustic Fence & Roof

- 5.54 The acoustic timber screen is continued along the south elevation to enclose the plant. A timber acoustic screen also encloses the roof terrace, preventing noise egress from the rooftop condenser units and preventing noise egress from the terrace.
- 5.55 Internally, secondary glazing is proposed to be fitted to the windows in the front elevation of the property. These will serve hotel rooms and directly overlook Market Place, which is busy and has traffic (buses and taxis) late into the night. The building's listed front elevation and existing sash windows needs to be balanced with the need to ensure a good standard of accommodation and amenity to hotel guests, and secondary glazing is considered to be a suitable approach.

- 5.56 In terms of guests, noise will be carefully managed and a draft management plan is provided which deals with (amongst other things) door management policy, closing time, and guest dispersal.
- 5.57 Finally, it should also be emphasised that the proposed change of use involves two floors of high-quality guest accommodation. It is simply not in the interests of the applicant to allow the proposed food and drink operation at ground floor and the bar at third floor level to be noisy, late night venues. Hotel guests will expect a good standard of amenity to the rooms, and therefore the A3/A4 elements of the proposed use will be carefully managed to ensure noise egress is kept to a minimum and residential amenity is preserved.

The development can be undertaken and the premises operated without adverse impact on nearby amenity, in accordance with Policy RC7 of the CAAP and Policy DM4 of the Sites and Detailed Policies Document.

Odours

- 5.58 An odour control assessment accompanies the application, as new food franchises are proposed which includes associated extract ducting. It identifies the proposal as a 'high risk odour control' and therefore proposes baffle filters within canopies and 1no. purified air UVO unit per canopy by way of mitigation. Specification details are provided.

The development can be undertaken and the premises operated without adverse impact on nearby amenity, in accordance with Policy RC7 of the CAAP and Policy DM4 of the Sites and Detailed Policies Document.

Transport and Servicing

- 5.59 The context is that the existing use is intensive and traffic generation into Reading would be expected, in addition to workers using public transport or walking the final part of their journey to the building. The existing building and the uses within it is serviced from the street, via the alleyway to the side of the building.
- 5.60 The site constraints do not allow for any vehicle or bicycle parking on site, the existing building which occupies the footprint of the entire site is being retained.
- 5.61 The building is in a highly sustainable location, with a bus stand immediately outside the property and the main railway station a short walk away. Bicycle parking stands are located in Market Place, and bicycle hire stands are a short walk away on King Street. Trip generation by

employees is expected to be less than an office, and hotel guests – and particularly customers to the food hall – would be expected to arrive by foot or public transport. The proposal is considered to be an improvement on the existing situation.

- 5.62 Servicing and deliveries to the building will continue as per the existing arrangement, via the gated alleyway running up the side of the building. It should be noted that this access is for deliveries and emergencies only, it is not for use by staff, customers, or guests.
- 5.63 Servicing bays are located within close proximity to the site on King Street to the south and on Market Place to the north. Vehicles will use these bays and carry/wheel deliveries to and from the premises.
- 5.64 A dedicated refuse and recycling storage is located at the eastern end of the alleyway, utilising the shed currently located there. On collection days a staff member or manager will be responsible for taking the bins to the kerbside of Market Place for collection.
- 5.65 A draft management plan accompanies this application and sets out how deliveries and servicing will be managed.

Accordingly, the development can be undertaken and operated without adverse impact on the highway network, without impacting highway safety, and without adverse impact on nearby residential amenity. The proposal is in accordance with policies RC7 and DM4.

Access Statement

- 5.66 Access to the building remains as existing, entrances will not be altered.
- 5.67 The main entrance fronting Market Place will be used by customers, guests, and staff; the emergency exit on the side elevation is for deliveries and will be used in case of emergency. The rear stair and lift core can be used in case of emergency, whilst the front stair and lift core is the primary customer-facing core providing access to all levels. A new emergency stair enclosure is provided at third floor (roof) level as a second means of escape, as this currently does not exist.
- 5.68 The building is fully accessible on all floors for wheelchair users via the customer lift at the front of the building. Level access is achieved from the street into the main food hall area, where at ground floor level is an accessible WC (with the remainder of the customer WCs located at basement level).
- 5.69 Wheelchair refuge points are located on first, second and third floor levels in case of emergency when the lifts cannot be used. Bedroom 4 at first floor level is fully accessible.

The proposal is in accordance with Core Strategy Policy CS5.
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6. SUMMARY AND CONCLUSIONS

- 6.1 1-2 Market Place currently sits vacant, having been previously used as a bank at ground floor level with offices above. Planning permission and listed building consent is sought for the creation of a new unique high-quality eating and drinking offer at ground floor level, and the creation of 24 guest bedrooms above.
- 6.2 Behind the retained façade the building is modern and capable of easy adaptation and change, evidenced by the modern interior and use as offices.
- 6.3 The proposed use of the ground floor as an eating and drinking venue and on the upper floors as guest accommodation are appropriate uses in accordance with national and local policy. The proposals represent a significant financial investment which would bring the building back into gainful use, in doing so creating new jobs and being a significant benefit to the local economy.
- 6.4 The bank and office uses are not explicitly protected in this location in the context of the types of uses proposed: the use of the building for a food hall and drinking venue is supported in this location, as is hotel accommodation; an active frontage will be retained, indeed reinstated.
- 6.5 The proposal accords with the NPPF with regard to the town centre uses and in respect of bringing a town centre Listed Building back into an active use which is compatible with and supports the surrounding town centre uses. The development is sustainable and, in line with the NPPF, should be afforded full and swift support.
- 6.6 The development can be carried out without adverse impact on residential amenity, and without adverse impact on the local road network in terms of deliveries and servicing.
- 6.7 The heritage assets are properly retained and respected, and any minor harm to the listed building is, in this application, comprehensively outweighed by the public benefits arising from the proposal. The scheme satisfies all policy tests, and the proposal is in accordance with Paragraph 134 of the NPPF.
- 6.8 For all the above reasons, it is considered the proposal accords with the policies and objectives of the development plan and the National Planning Policy Framework, and it is respectfully requested that planning permission and listed building consent are granted.