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# 17-27 Queen Victoria Street, Reading

Planning Statement

July 2018



**17-27 Queen Victoria Street, Reading**

**Planning Statement**

|                     |                            |                |                            |                            |
|---------------------|----------------------------|----------------|----------------------------|----------------------------|
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## 1.0 INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by IDREAM Reading Ltd to prepare a Planning Statement in support of a full planning application for the:

**“Proposed change of use of first, second and third floor from offices (use class B1) to serviced apartments (use class C1) comprising 15 x 1 bed units and 4 x 2 bed units with associated internal alterations.”**

- 1.2 The term ‘serviced apartment’ refers to furnished apartments available for short or long-term stays, alongside the provision of amenities, housekeeping and a range of services for guests.
- 1.3 The drawings and supporting documentation that accompany this application are listed below. The contents of the submitted planning application are based on the requirements of the Reading’s Planning Application Validation Information Requirements Checklist and Guidance (December 2016).

### Proposed Drawings:

| Drawing Number | Drawing Title                  | Scale                                                    |
|----------------|--------------------------------|----------------------------------------------------------|
| PR-A1.01       | Proposed Basement Plan         | 1:100                                                    |
| PR-A1.02       | Proposed Ground Floor Plan     | 1:100                                                    |
| PR-A1.03       | Proposed First Floor Plan      | 1:100                                                    |
| PR-A1.04       | Proposed Second Floor Plan     | 1:100                                                    |
| PR-A1.05       | Proposed Third Floor Plan      | 1:100                                                    |
| PR-A1.06       | Proposed Roof Plan             | 1:100                                                    |
| PR-A2.01       | Proposed Front Elevation       | 1:100                                                    |
| PR-A2.02       | Proposed Rear Elevation        | 1:100                                                    |
| PR-A3.01       | Proposed Section A             | 1:100                                                    |
| PR-A3.02       | Proposed Section B             | 1:100                                                    |
| PR-A4.01       | 3D Views                       | Not to scale - drawings are for indicative purposes only |
| PR-A4.02       | Entrance Façade Views          | 1:50                                                     |
| PR-A5.01       | Proposed Stair 03 Treatment    | Various                                                  |
| PR-A5.02       | Proposed Rear Window           | 1:10                                                     |
| DETAILS01      | Typical Details                | 1:10                                                     |
| DETAILS02      | Typical Details                | 1:10                                                     |
| DETAILS03      | Typical Details                | Various                                                  |
| DETAILS04      | Typical Details                | 1:5                                                      |
| DETAILS05      | Typical Details                | 1:50                                                     |
| DE-A1          | Basement Floor Demolition Plan | 1:50                                                     |
| DE-A10         | Demolition Side Elevations     | 1:50                                                     |
| DE-A11         | Demolition Section A           | 1:50                                                     |
| DE-A12         | Demolition Section B           | 1:50                                                     |

|            |                                 |       |
|------------|---------------------------------|-------|
| DE-A13     | Demolition Section C            | 1:50  |
| DE-A2      | Ground Floor Demolition Plan    | 1:50  |
| DE-A3      | First Floor Demolition Plan     | 1:50  |
| DE-A4      | Second Floor Demolition Plan    | 1:50  |
| DE-A5      | Third Floor Demolition Plan     | 1:50  |
| DE-A6      | Roof Demolition Plan            | 1:50  |
| DE-A7      | Demolition East Elevation       | 1:50  |
| DE-A8      | Demolition West Elevation       | 1:50  |
| DE-A9      | Demolition Side Elevations      | 1:50  |
| PR-A1.07.1 | Proposed Ground Floor Plan Bins | 1:100 |
| PR-A1.07.2 | Proposed First Floor Plan Bins  | 1:100 |
| PR-A1.07.3 | Proposed Second Floor Plan Bins | 1:100 |
| PR-A1.07.4 | Proposed Third Floor Plan Bins  | 1:100 |

### Supporting Documentation:

- Completed Application Form
- Completed CIL Compliance Form
- Planning Statement, prepared by Barton Willmore (dated July 2018)
- Design and Access Statement, prepared by Scenario Architecture (dated July 2018)
- Transport Statement, prepared by Scenario Architecture (dated July 2018)
- Waste Management strategy, prepared by Scenario Architecture
- Heritage Statement; prepared by WYG (dated July 2018)
- External Building Fabric Report, prepared by RBA Acoustics (dated 6th July, 2018)
- Interior Building Fabric Letter, prepared by RBA Acoustics (dated 6th July, 2018)
- Air Quality Assessment, prepared by Acoustic Air (dated July 2018)
- Energy (SAP) Analysis Report, prepared by CES (dated July 2018)
- Utilities Statement, prepared by CES (dated July 2018)

1.4 This application follows informal pre-application advice from Reading Borough Council that a pre-application submission would not be necessary in this instance.

1.5 This proposal presents the opportunity to deliver 19 serviced apartments in a highly sustainable location. In addition, it will constitute a compatible, appropriate use for the Listed Building.

### Structure of Planning Statement

1.6 **Chapter 2.0** of this statement (The Application Site and Surroundings) details the physical characteristics of the Application Site and its immediate surroundings.

1.7 **Chapter 3.0** (Planning History) sets out the planning history of the site.

- 1.8 **Chapter 4.0** (The Proposed Development) provides details of the Proposed Development.
- 1.9 **Chapter 5.0** (Pre-application Advice) sets out the response to the pre-application advice which has been sought previously from Reading Borough Council.
- 1.10 **Chapter 6.0** (Relevant Planning Policies) refers to the relevant policies from Reading Borough Council's Development Plan, as well as relevant national policies and guidance.
- 1.11 **Chapter 8.0** (Planning Issues) provides a response to the Development Plan Policies and other guidance which relate to the Application Site and the Proposed Development. It presents the planning balance to be made in determining the application. This chapter explains why the Proposed Development should be approved.
- 1.12 **Chapter 9.0** (Summary and Conclusions) sets out the conclusions of this Statement.

## **2.0 THE APPLICATION SITE AND SURROUNDINGS**

- 2.1 The application site is within the administrative area of Reading and is within the heart of Reading Town Centre. The site is within the designated Reading Central Area, Central Core, Primary Shopping Area, Office Core and Existing Active frontage as designated by the Reading Central Area Action Plan (RCAAP). The site is approximately 500m to the south of Reading station which has frequent services to London and the South West. Due to the central location of the site, it is well situated for services with a wide range of shops and restaurants within 100m.
- 2.2 The application site is to the west of Queen Victoria Street, a pedestrianised street with active frontages at ground floor level on both sides predominantly consisting of retail and food and drink uses. The site comprises a three-storey terrace with rooms in the roof and basement. The entire street is made up of three-storey 19<sup>th</sup> century terraces which have a collective Grade II listing.
- 2.3 The building currently comprises a town centre use at ground floor level which will be unaffected by this proposal. The first, second and third floors are currently within office use although it should be noted that all but one of the units are now vacant with unit No. 17 having been vacant since 2008.

### **3.0 PLANNING HISTORY**

3.1 The following planning and listed building consent applications are considered to be relevant to this application:

- 170650/FUL and 170651/LBC - Proposed change of use of first, second and third floor from office to residential use comprising 15no. 1 bed flats and 4no. 2 bed flats with associated internal alterations. - Planning Committee resolved to grant planning permission on 6<sup>th</sup> December 2018 subject to the conclusion of S106 discussions.
- 111190FUL and 111191LBC - Proposed change of use of first, second and third floors from office to 9 x 1 bed flats and 4 x 2 bed flats – Granted (26<sup>th</sup> September 2011)
- 06/00511/FUL and 06/00512/LBC - Change of use from office to residential on 1st, 2nd and 3rd floors. 13 no flats to include one studio, 4no two bed and 8no one bed. – Granted (24<sup>th</sup> August 2006).

## 4.0 THE PROPOSED DEVELOPMENT

- 4.1 Floors 1-3 of the application building currently consists of office floor space. The proposal comprises a change of use of the upper three floors of this Grade II listed building to serviced apartments (use class C1) and the internal alterations and reconfigurations necessary to form 19 independent units. The description of development is as follows:

**“Proposed change of use of first, second and third floor from office (use class B1) to serviced apartments (use class C1) comprising 15no.1 bed flats and 4no.2 bed flats with associated internal alterations.”**

- 4.2 The proposed development represents a good opportunity for the sustainable redevelopment of a listed building on a centrally located site. The proposal does not include any extensions or material external alterations to the exterior of the listed building but does proposed internal reconfiguration to deliver the 19 no. units put forward under this application. The proposal anticipated to be deliverable in the short term with terms having already been agreed with an operator of the proposed serviced apartments.

## 5.0 PRE-APPLICATION ADVICE

5.1 Following advice from the case officer for the previous scheme, no formal pre-application advice was sought for this scheme. Given that the only changes to the scheme relate to the proposed use - from C3 to C1 - and on the basis that the layout and proposed alterations to the listed building are exactly as per the previous application, the view was taken that further pre-application negotiations were not required. The detailed considerations relating to design, layout, amenity and the listed building were discussed at length during the previous round of pre-application and are equally applicable to the determination of the current scheme. The chronology of those events is set out below, for completeness.

5.2 A pre-application enquiry (reference 160494/PREAPP) was made to the Council in relation the proposal in 16<sup>th</sup> March 2016. Following this original submission there were various meetings / correspondence as follows:

- 16<sup>th</sup> March 2016, Pre-application submission made to the Council
- 5<sup>th</sup> May 2016, site visit undertaken
- 25<sup>th</sup> May 2016, initial meeting held at Council Offices with Matthew Burns (Senior Planning Officer) and Jon Mullis (Council's Conservation Consultant)
- 7<sup>th</sup> June 2016, revised drawings sent through to the Council
- 16<sup>th</sup> June 2016, Council's written response received
- 28<sup>th</sup> September 2016, revised drawings sent through to the Council
- 6<sup>th</sup> October 2016, meeting held at Barton Willmore with Matthew Burns (Senior Planning Officer) and Jon Mullis (Council's Conservation Consultant)
- 12<sup>th</sup> January 2017, revised drawings sent through to the Council
- 27<sup>th</sup> January 2017, telephone conversation with Matthew Burns in relation to revised drawings
- 3<sup>rd</sup> February 2017, revised floor plan sent to the council for review in relation to privacy of future occupiers
- 17<sup>th</sup> February 2017, phone call with Matthew Burns in relation to revised drawings

5.3 As a result of the previous pre-application process the layout was subject to significant alterations to address the concerns raised by Matthew Burns and Jon Mullis. The proposal as initially presented to the Council included extensions to the rear of the listed building. These no longer form part of the proposals for the site. The design was also revised to incorporate the case officer's advice in respect to the need for various obscure glazing / louvers to ensure that the privacy and amenity of future occupiers is protected.

## 6.0 PLANNING POLICY CONTEXT

### Overview

- 6.1 At the national level, relevant policy and guidance is set out within the Framework published in 2012 and the supporting Planning Practice Guidance ('the PPG') published in 2014.
- 6.2 S38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. The Development Plan for Reading comprises:
- Core Strategy (CS) (Adopted 2008, Altered 2015)
  - Reading Central Area Action Plan (RCAAP) (2009)
  - Sites and Detailed Policies Document (SDPD) (2015)

### Emerging Policy and Local Development Scheme

- 6.3 Reading Borough Council is in the process of producing a new Local Plan. The Examination in Public into the new Local Plan is due to commence late September 2018 with adoption anticipated early 2019.

### National Planning Policy Framework

- 6.4 Relevant national planning policy guidance can be found in the Framework which was published on the 27<sup>th</sup> March 2012 and superseded 24<sup>th</sup> July 2018.
- 6.5 The Framework establishes that while planning decisions should be taken in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, they should also be made in the context of a presumption in favour of sustainable development.
- 6.6 Paragraph 10 of the Framework highlights that at the heart of the Framework is a presumption in favour of sustainable development for both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the development plan without delay.

- 6.7 Paragraph 184, identifies conserving 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 as a core planning principle. This proposal would ensure the positive and sustainable use of a heritage asset and therefore, would be consistent with the delivery this principle.

### **Building a Strong, Competitive Economy**

- 6.8 Paragraph 80 of the Framework states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

### **Promoting Sustainable Transport**

- 6.9 According to Paragraph 102 of the Framework, transport policies should take opportunities to promote walking, cycling and public transport use. Paragraph 103 focuses development on locations which are or can be made sustainable.

### **Requiring Good Design**

- 6.10 The NPPF carries a clear statement requiring good design as an integral part of achieving sustainable development. There is a clear emphasis on how the design of the proposed development contributes positively to an area rather than the architecture of the built form; proposals must therefore be grounded within good urbanism that performs over time in terms of function, connectivity and sense of place.

### **Planning Practice Guidance (PPG)**

- 6.11 PPG was published on 6 March 2014 and is supplementary to the National Planning Policy Framework. The guidance should be read in conjunction with the Framework and is also a material consideration in the determination of planning applications.
- 6.12 Of particular interest, is the PPG relating to design which focuses on good quality design as an integral part of sustainable development. Paragraph 002 requires that good design enhances and quality of the buildings and spaces including form and function, efficiency and effectiveness. Paragraph 007 promotes character in the townscape and reinforcing locally distinctive patterns of development with view into and out of sites being carefully considered as part of the design process.

- 6.13 In addition, Paragraph 004 considers that local planning authorities should give great weight to outstanding or innovative designs and the proposals “economic, social and environmental benefits.”
- 6.14 PPG (Historic Environment) states that decisions relating to listed buildings and their setting and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant National and Local Planning Policies.
- 6.15 Conservation is defined within paragraph 003 (Reference ID: 18a-003-20140306) as ‘an active process of maintenance and managing change’ requiring a ‘flexible and thoughtful’ approach. It goes on to say that ensuring heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time.

### **The Development Plan**

- 6.16 As set out above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the development plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless other material considerations indicate otherwise. Of direct relevance to the determination of this application are the following Reading Borough Council Plan Documents:

- Core Strategy (CS) (Adopted 2008, Altered 2015)
- Reading Central Area Action Plan (RCAAP) (2009)
- Sites and Detailed Policies Document (SDPD) (Adopted 2012, Altered 2015)

### **Core Strategy (Adopted 2008, Altered 2015)**

- 6.17 The adopted Reading CS (2008, 2015) is the Council’s key planning document and is used as the basis for all planning decisions taken within the Borough. Of the policies contained within the CS those which are relevant to the determination of the proposed development are summarised below.
- 6.18 **Policy CS1** (Sustainable Construction and Design) states that proposals for new development including refurbishment of existing building stock will be acceptable where energy, water, minerals and other natural resources are used appropriately, efficiently and with care. The policy is supported by Reading Borough Council’s Sustainable Construction SPD and requires that planning applications for major development are accompanied by a Sustainability Statement and an Energy Statement.

- 6.19 **Policy CS9** (Infrastructure, Services, Resources and Amenities) requires development proposals to provide the necessary level of infrastructure. Since the adoption of this policy, the council has adopted a Community Infrastructure Levy charging scheduled which largely supersedes the requirements of this policy. It is understood that the development will not be CIL liable.
- 6.20 **Policy CS11** (Use of Employment Land for Alternative Uses) resists the loss of employment land within the Core Employment Areas. The application site is not within one of these areas and, as such, the loss of office space falls to be considered against the following criteria:
- Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?
  - Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
  - Is there a surplus of a similar size and type of accommodation in Reading?
  - Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
  - Is the need for alternative uses stronger than the need for the retention of employment land?
  - Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?
- 6.21 **Policy CS15** (Location, Accessibility, Density and Housing Mix) encourages development to provide an appropriate mix of housing types, sizes and tenures. Supporting paragraph 6.22 notes that flatted development in urban areas is often more attractive than housing although encourages the provision of an element of family housing within developments. The delivery of 16no. serviced apartments in this central urban location is considered compatible with the broad objectives of policy CS15.
- 6.22 **Policy CS16** (Affordable Housing) requires all development of 15 dwellings and above to provide 30% on site affordable housing. It goes on to state that in all cases where the proposal falls short of the policy target as a result of viability, an open book approach will be taken, with the onus on the developer/landowner to demonstrate circumstances justifying a lower affordable housing contribution. Cross reference to future discussion on AH. Policy CS16 does not apply given that the proposal now seeks consent for a C1 use as opposed to C3.

- 6.23 **Policy CS23** (sustainable travel and travel plans) encourages major development proposals to promote sustainable transport facilities including the encouragement of walking, cycling and the use of public transport.
- 6.24 **Policy CS24** (Car/Cycle Parking) states that car parking standards and cycle parking requirements will be applied in relation to the accessibility of the location and availability of public transport.
- 6.25 **Policy CS33** (Protection and Enhancement of the Historic Environment) of the CS supports the policy position within the NPPF by stating that historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced.

Sites and Detailed Policies Document (SDPD) (Adopted 2012, Altered 2015)

- 6.26 Reading's Sites and Detailed Policies Document was originally adopted October 2012 with revisions adopted January 2015. The purpose of the document is to provide the detailed planning policies to identify the specific development sites and designations necessary to deliver the Core Strategy. The following policies summarised below are considered relevant to the determination of this application.
- 6.27 **Policy SD1** (Presumption in Favour of Sustainable Development) states that the Council will take a positive approach to consider development proposals and that planning application that accord with the policies within the development plan will be approved without delay.
- 6.28 **Policy DM1** (Adaption to Climate Change) requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 6.29 **Policy DM4** (Safeguarding Amenity) seeks to prevent new development from having a significant adverse impact on the living environment of existing or new residential properties. Considerations include privacy and overlooking, access to sunlight and daylight and noise and disturbance.
- 6.30 **Paragraphs 9.1.22 – 9.1.23** (Nationally and Locally Listed Buildings and Structures) relate to the development and change of use of heritage assets. Whilst the content of these paragraphs is of note, there are no specific policies relating to Listed buildings within the SDPD. Instead, the SDPD directs the reader towards policy CS33 of the Core Strategy and National policy (both summarised above).

- 6.31 **Policy DM19** (Air Quality) states that development should reduce the effects of poor air quality. It requires any detrimental effects on residential development within an Air Quality Management Area to be mitigated and for these mitigation measures to be detailed in any planning application.

Reading Central Area Action Plan (2008)

- 6.32 The Reading Central Area Action Plan (RCAAP) (2008) establishes the planning framework and vision for central Reading for the period until 2026. The application site falls within this area and the relevant policies are set out below.
- 6.33 The site falls within the following areas designations of the RCAAP: Primary shopping area, central core, office core and existing active frontage.

**Emerging Planning Policy**

*New Local Plan*

- 6.34 The Council's New Local Plan is at an advanced stage of the Plan making process and as such it is relevant to consider relevant policies contained therein.
- 6.35 Policy CR6 'Living in Central Reading' addresses residential development within the central area. CR6 (iv) is clear that *'...where proposals for serviced apartments and apart-hotels fall outside the C3 use class, they will be located in the Central Core. Such proposals will not be permitted unless the duration of occupation of residents is restricted, to ensure the units are used on a short stay basis and not as residential flats, and information monitoring the implementation of this restriction is regularly supplied.'*
- 6.36 The submitted proposals are compliant with emerging Policy CR6. The Applicant acknowledges the need to restrict the occupation of the proposed units to ensure that they are not used as residential flats (C3).

Community Infrastructure Levy (adopted April 2015)

- 6.37 We understand that in accordance with the adopted Charging Schedule, hotel development is liable for a charge of £120 per sqm of new floorspace. The proposal does not involve the creation of new floorspace and, as such, is not CIL liable.

## 7.0 PLANNING CONSIDERATIONS

7.1 The following section provides our assessment of the proposal against relevant planning policy.

### Principle of Development

7.2 The proposal would result in the creation of 19 new serviced apartments in a sustainable location which is consistent with the presumption of sustainable development within National Planning Policy and within policy SD1 of Reading's Sites and Detailed Policies Document (2015). Notwithstanding this, the existing use of the site is employment, and so the acceptability of the loss of this use against the development plan must be considered.

7.3 The site does not fall within a 'Core Employment Area' as established by the Core Strategy. Therefore, the loss of employment land must be considered against the criteria within CS11 as follows:

- Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?
- Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?
- Is there a surplus of a similar size and type of accommodation in Reading?
- Would continued employment use of the site detrimentally affect the amenity and character of a residential area?
- Is the need for alternative uses stronger than the need for the retention of employment land?
- Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

7.4 In relation to the first criteria, the site is well positioned in relation to a range of transport methods although it should be noted that it lies on a pedestrianised street so access via private vehicle is limited.

7.5 In relation to the second and third criteria, it is not considered that the continued use of the building for office is viable nor is it considered that there is a demand for this type of office space. The existing office floorspace available at the site is small and convoluted in nature, split over three floors and with a collection of relatively small rooms.

- 7.6 As such, it is not considered to meet the requirements of modern-day office occupation which favours an open plan layout often set over the same floor. As a result, the office units are vacant (and have been for quite some time) and it is not considered that a continued office use is viable, especially given the scale of new high quality office development currently under construction within Reading Town Centre and the surrounding areas. In relation to the final criterion, it is understood that there is a prevalence of residential uses within the upper floors of neighbouring and surrounding buildings along Queen Victoria Street and, due to the listed nature of the buildings and land ownership considerations, there would not be an opportunity for a comprehensive redevelopment scheme.
- 7.7 On balance, the loss of employment use on the application site is consistent with policy and there should be no in principle objection to the loss of office accommodation and conversion to residential.
- 7.8 In addition to the above policy support is found within emerging policy CR1 subject to the imposition of appropriate controls relating to occupancy.
- 7.9 In addition to the overarching policy compliance, the principle of conversion of the existing offices to residential has been established under applications 111190FUL (associated listed building consent 111191LBC) and 06/00511/FUL (associated listed building consent 06/00512/LBC). Whilst it is acknowledged that there have been changes to planning policy since these decisions, notably, the adoption of the NPPF in 2012 at a national level and locally, the adoption of the Sites and Detailed Policies Document (SDPD) also in 2012, it is not considered that the policy position in respect of the consideration of matters relevant to the principle of this development have materially changed. As such, the principle of the development should continue to be considered acceptable as was the case under applications 111190FUL and 06/00511/FUL, which, although lapsed without implementation, both merit material planning considerations for the purposes of this application.

#### Design and Impact on Listed Building

- 7.10 National and local planning policy as summarised above has a strong presumption in favour of the protection and enhancement of heritage assets. This proposal relates to part of a Grade II listed building and is, therefore, supported by a Heritage Statement. The report has assessed the importance of the site in its own right and as part of the wider listed building.

- 7.11 The report concluded that the alterations would result in a very low level of less than substantial harm which would be outweighed by the considerable public benefits arising from the scheme.

Amenity of Future Occupiers / Standard of Residential Accommodation

- 7.12 In relation to the amenity of future occupiers, the following aspects need to be considered:

- Noise
- Internal space
- Outlook
- Privacy
- Air Quality
- Amenity Space

- 7.13 **Noise.** Due to the town centre location, the application is accompanied by an External Building Fabric Report and Interior Acoustics Strategy produced by RBA Acoustics. The external building fabric report has established the glazing and trickle ventilator requirements to ensure suitable internal noise levels are achieved within the proposed development. The interior acoustics strategy clearly establishes a range of internal insulation measures between the commercial and serviced apartment space and between serviced apartment units. It is understood that these measures will be incorporated within the development.

- 7.14 **Outlook.** The arrangement of units has been carefully considered to ensure that all habitable rooms are provided with a non-obscurely glazed window to ensure that future guests at the serviced apartments are provided with an outlook and an appropriate level of daylight.

- 7.15 **Privacy.** The layout and arrangement of the existing listed building is such that there are windows within close proximity of one another and, in some cases, directly opposite each other at close quarters. To ensure privacy and the feeling of privacy for future guests, we propose a combination of obscure glazing on non-habitable rooms/to secondary windows and the introduction of small panels to prevent any views. The details of these proposed measures can be seen on the Proposed First Floor Plan (drawing PR-A1.03).

7.16 **Air Quality.** Due to the location of the site within an Air Quality Management Area, an Air Quality Assessment produced by AcousticAir accompanies this application. The Assessment concludes that due to the pedestrianised location of the proposal site and the distance from the nearest traffic sources, the overall degree of harm due to air pollution will be small. It also states that because the development is car free, the proposal would not interfere with or prevent implementation of measures within the Council's Air Quality Management Plan. Therefore, the proposal is consistent with the requirements of policy DM19 of the SDPD (2012, 2015) and policy RC9 of the Reading Central Area Action Plan (2008).

7.17 **Amenity Space.** The proposal does not include the provision of any outdoor amenity space. This is due to the constrained nature of the proposal site and the fact that the proposal relates to a change of use of the upper floors of an existing building within a town centre location. The provision of amenity space is not considered necessary, nor is it a policy requirement for a C1 use.

#### Sustainable Design and Construction

7.18 An energy efficiency statement (Energy (SAP) Analysis Report, March 2017; CES) is submitted in support of this application. This report concludes that new development achieves an average of 20.6% CO2 reduction above the notional building which meets the notional building which meets the Council's Planning requirements.

#### Transport

7.19 No car parking provision is included as part of this proposal. The application site is located within a highly sustainable location with shops, facilities and services within close walking distance. The site is also within close reach of Reading mainline station with services between London and the South West and local bus stops with frequent services across Reading and the surrounding area. As such, where required, sustainable choices of transport will be readily available to future occupiers of the site.

#### Ecology

7.20 In the run-up to the submission of this application, the case officer provided confirmation that that an ecology appraisal would not be required. This is because the proposal does not seek permission for significant external alterations.

Community Infrastructure Levy

- 7.21 The Community Infrastructure Levy maybe payable on development which creates net additional floor space with the gross internal area of new build exceeds 100 square metres. The proposal for which we seek permission does not result in any net additional floor space and, as such, is not liable to pay Community Infrastructure Levy. – indicate that a small proportion is likely to be liable as per the submitted CIL form.

## **8.0 SUMMARY AND CONCLUSIONS**

- 8.1 This application is submitted on behalf of IDREAM Reading Ltd for the proposed change of use of first, second and third floor from office to residential use to create 19 no. serviced apartments.
- 8.2 It is considered that the proposed development will see positive investment into a new use for this listed building. The site is located in a sustainable location within Reading town centre, immediately surrounded by key services and facilities. In addition, the site is within short walking distance of Reading railway station and bus stops with frequent services locally within Reading and the wider surrounding area. We believe that the proposal represents an efficient and effective use of the existing building which will deliver significant and tangible benefits including the creation of 19 high quality serviced apartments in a central location.
- 8.3 This Statement, in conjunction with the other statements and reports which have been submitted in support of this application, demonstrate, that the proposed development is in accordance with the policy objectives of the Framework, policies contained within Reading Borough Council's Development Plan and other relevant considerations.
- 8.4 Having regard to the details contained within this Statement, it is considered that the proposal being put forward in this planning application is consistent with the policies of the Development Plan and, in light of paragraph 14 of the National Planning Policy Framework, planning permission should be approved without delay.