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JR Properties

2 Bedford Road, Reading, RG1 7HS

Planning and Heritage Statement



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Full Planning Application to Reading Borough Council for the demolition of the former Royal Public House and erection of a part 5 storey building which would provide a new unit (Use Class A1/A2/A3) at ground floor and 6 self-contained flats (Use Class C3).

Our REF: APA/JRPRO/16/1448

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1.0 INTRODUCTION

- 1.1 This Planning and Heritage Statement has been prepared by Aspbury Planning Limited on behalf of JR Properties Ltd in support of the planning application for Full Planning Permission for the demolition of the former Royal Public House, 2 Bedford Road, Reading, RG1 7HS and the erection of a part 5 storey building which would provide a new unit (Use Class A1/A2/A3) at ground floor and 6 self-contained flats (Use Class C3) above.
- 1.2 The Statement describes, firstly, the Application Proposal, the site and surrounding area, and goes on to examine the relevant planning history of the site. Thereafter, it sets out the planning policy considerations, the heritage assessment and the conclusions.

2.0 THE APPLICATION PROPOSAL

- 2.1 The Applicant is proposing to demolish the Royal Pub which has been vacant since 2015 and erect a 5 storey mixed use building comprising an A1/A2/A3 unit and 6 self-contained flats. There would be no vehicular access to the development and no on-site car parking. The proposed A1/A2/A3 unit would be situated at ground floor level on the corner of Oxford Road and Bedford Road and would provide 106 m² of floor space. The introduction of a UCO Part A element at ground floor is essentially a design device to 'insulate' the sensitive residential uses above from the conditions obtaining at ground level on the busy road junction and to afford them greater privacy. Pedestrian access for customers would be from Oxford Road and would provide an active (shop window) frontage onto both roads. The 6 no. residential units would also be accessed from Oxford Road and the refuse and recycling area would be situated to the rear of the circulation area. At first floor there would be 3 no. 1 bedroom flats, at second and third floor there would be 1 no. 2 bedroom flat and 1 no. 1 bedroom flat would be situated on the fourth floor. The development would be served by 6 external bicycle spaces and 6 internal spaces, which would be located within the entrance to the residential unit.
- 2.2 The proposed development has been designed to ensure that it is appropriate in context and responds positively to the site's constraints. The two storey rear element would have a flat roof and the front element which would be 4 and 5 stories in height would have a mansard roof with dormer windows. The proposed glazing at ground floor would provide an active frontage onto the street scene. The proposed openings on the properties southern

and western elevations have a vertical emphasis and have a proportional layout. To the rear (northern elevation) the residential units would be lit/ventilated by smaller square high level windows.

3.0 THE SITE AND SURROUNDING AREA

- 3.1 The Application Site is situated on the (north west) corner of the traffic-light controlled junction of Bedford Road and Oxford Road. Oxford Road is a principal arterial route leading into/out of Reading Town Centre, which is located appropriately 260m to the west. It is also an important bus route. Bedford Road is a major distributor road within the Town which connects Oxford Road to the Town's Inner Ring Road to the east via Chatham Street. Both roads are heavily trafficked. The junction is clearly the result of significant 'improvement' (widening) in the last century.
- 3.2 The Site is currently occupied by the vacant and semi-derelict 'The Royal' Public House, which closed in 2015 and has subsequently been acquired by the Applicant Company. The former Public House building, which is constructed of smooth rendered masonry and a pitched slate roof, fronts onto Oxford Road. It is set back from that road by approximately 3.8m to 7.7m, within which area there was previously an outdoor drinking terrace contained by a low post and rail timber fence. Its western elevation immediately abuts the back of the pavement on Bedford Road.
- 3.3 The building, which was clearly much altered in its life, is of no architectural or historic merit and its appearance has a negative impact on the visual amenity of the area. Latterly during its life as a public house, it had a recorded history of and a reputation for criminal and anti-social behaviour which was severely detrimental to the amenity of adjoining occupiers/residents. There are, moreover, other public houses in the vicinity so its permanent removal will not result in the loss of a community asset.
- 3.4 The area surrounding the Application Site comprises a mix of uses including residential, retail, leisure, places of worship, business uses and hot food takeaways and a diversity of architectural styles, scales and ages, especially on the north side of Oxford Road and astride Bedford Road/Chatham Street. Most development here is of a modern, functional and undistinguished character. Except for the predominantly residential area to the south of

Oxford Road (which is also subject to Conservation Area protection), there is, therefore, no uniformity of architecture and townscape style in the local street scene.

- 3.5 Immediately adjoining the site on its eastern boundary is a modern, two storey, flat-roofed retail unit that has planning permission for an additional floor (Planning reference 130602 and 141780). This development has now commenced in accordance with Section 56 of the Town and Country Planning Act (Planning reference: 171173). Directly to the rear of the site is a large red-brick building, known as '10 Trinity Place', which comprises sheltered retirement apartments. Lying between this development and the Application Site is a walled service yard, car parking area and a garage/store.

4.0 RELEVANT PLANNING HISTORY

- 4.1 A pre-application enquiry was submitted to Reading Borough Council for the *'part redevelopment (2 Bedford Road) and part refurbishment and extension (118a Oxford Road) of the site to provide retail use at ground floor and residential use at upper levels. More specifically, 3 retail units at ground floor and 9 residential units (2x1 bed and 7x2-bed) at first, second and part third floor level'* (LPA reference: 160113/PREAPP). A formal response to the pre-application enquiry was received on 7th March 2016. In summary the response concluded that that the principle of residential development on the site would be supported. With regards to the proposed residential mix the response stated that a full planning application would need to provide justification for not providing any 3 bed units. In terms of design the letter states that *'at present, officers are unconvinced by the design quality shown and whether this would preserve or enhance the setting of the nearby listed buildings (118, 120 and the Church) and views into the conservation area opposite. It is considered that the site has the potential to incorporate the highest quality design, and indeed this is necessary in this case given the characteristic and context of the site'*. Finally, with regard to impact on nearby occupiers the response considered that the proposed development has potential to cause loss of outlook, sense of enclosure, loss of daylight/sunlight and overlooking.
- 4.2 A second pre-application enquiry was submitted to the Council in June 2016 (LPA Reference: 161134). The revised proposal was for 2 retail units at ground floor (totalling 70 sqm GIA and 49 sqm storage for existing use) and 9 residential units (totalling 5660 sqm

GIA). A pre-application meeting was held on 13 September 2016. A formal written pre-application response is however still outstanding and the Agent requested this response as recently as 12th September 2017.

- 4.3 The most recent pre-application enquiry was submitted to Reading Borough Council on 2nd January 2018. A pre-application meeting was held on 7th March 2018 with a Planning Officer and a subsequent meeting on 29th March 2018 with the Planning Officer and Conservation Officer. The agent has requested on numerous occasions a formal pre-application response, however this remains outstanding.

5.0 PLANNING POLICY CONTEXT

- 5.1 In accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004, section 70(2) of the Town and Country Planning Act 1990 and paragraphs 11 and 150 of the National Planning Policy Framework, planning law requires that applications are determined in accordance with the Development Plan, unless material planning considerations indicate otherwise. In this case the Development Plan is the Core Strategy (2008), Reading Central Area Action Plan (2009) and Site and Detailed Policies Document (2012). The Submission Draft Reading Borough Local Plan (2018) was submitted for examination in March 2018. In accordance with paragraph 216 of the Framework, some weight can be afforded to the emerging Plan according to its stage of preparation, extent of unresolved objections and degree of consistency with the Framework. The National Planning Policy Framework is itself a material consideration which should be given great weight in the decision making process.

5.2 Core Strategy (2008) (with Alterations Adopted 27th January 2015)

- 5.2.1 The adopted Core Strategy (2008) forms part of the Reading Borough Local Development Framework and it sets out the Council's planning strategy to achieve the 2020 vision.
- 5.2.2 **Policy CS1 (Sustainable Construction and Design)** supports proposals for new development *'where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change'.*

- 5.2.3 **Policy CS4 (Accessibility and the Intensity of Development)** requires the scale and density of new development to relate to its level of accessibility by walking, cycling and public transport to a range of services and facilities.
- 5.2.4 **Policy CS5 (Inclusive Access)** 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'*.
- 5.2.5 **Policy CS6 (Settlement Boundary)** states that no development will be permitted outside the identified settlement boundary.
- 5.2.6 **Policy CS7 (Design and Public Realm)** requires all development proposals to be designed to a high quality and maintain and enhance the appearance and character of the surrounding area. Amongst other things this includes ensuring that development proposals respond positively to their local context, protect and enhance the historic environment and create safe and accessible environments.
- 5.2.7 **Policy CS15 (Location, Accessibility, Density and Housing Mix)** outlines the need to provide an appropriate density and mix of residential development across the Borough. It states that *'developments should provide an appropriate range of housing types, size and tenures, in accordance with the findings of a housing market assessment).'*
- 5.2.8 **Policy CS24 (Car/Cycle Parking)** states that cycle parking requirements will be applied in relation to the accessibility of location within the Borough to sustainable transport facilities, particularly public transport.
- 5.2.9 **Policy CS22 (Transport Assessments)** requires proposals to make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport.
- 5.2.10 **Policy CS25 (Scale and Location of Retail, Leisure and Culture Development)** states that *'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'*.

5.2.11 **Policy CS26 (Network and Hierarchy of Centres)** sets out a network of identified centres. The most relevant identified centre to the Application Site is Reading Centre which is a Regional Centre.

5.2.12 **Policy CS33 (Protection and Enhancement of the Historic Environment)** states that *'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.'*

5.3 Reading Central Area Action Plan (2009)

5.3.1 The Reading Central Area Action Plan forms part of the Reading Borough Local Development Framework and it sets out planning policies to guide development until 2026.

5.3.2 **Policy RC5 (Design in the Centre)** sets out a criteria which new development within the Reading central area should meet. Amongst other things development proposals should provide frontages that engage with the street at lower levels and architectural details and materials used in the central area should be of high quality and respect the form and quality of the detailing and materials in the local area.

5.3.3 **Policy RC9 (Living in the Centre)** outlines a development criteria which proposals for residential development will be assessed against. Amongst others this includes ensuring development contribute towards delivering a mix of different sized units, contribute towards providing affordable housing and will not result in an adverse impact on community facilities.

5.4 Sites and Detailed Policies Document (2012) (with Alterations Adopted 27th January 2015)

5.4.1 The Sites and Detailed Policies Document was adopted by Reading Borough Council in 2012 and it sets out detailed policies which sit alongside the Core Strategy.

5.4.2 **SD1 (Presumption in Favour of Sustainable Development)** reiterates the sustainability approach set out in the National Planning Policy Framework.

5.4.3 **Policy DM4 (Safeguarding Amenity)** supports development that will not have a detrimental impact on existing and 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, vibrating, dust and fumes and crime and safety.

5.4.4 **Policy DM6 (Affordable Housing)** requires that sites of 5-9 dwellings provide a provision of 20% affordable housing.

5.4.5 **Policy DM14 (Impact of Main Town Centre Uses)** sets a local floorspace threshold of 1,000 sq m for requiring an impact assessment in support of applications for retail development in an edge-of-centre or out-of-centre location.

5.4.6 **Policy DM15 (Protection of Leisure Facilities and Public Houses)** states that *'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.'

5.5 **Submission Draft Reading Borough Local Plan (March 2018)**

5.5.1 The Submission Draft Reading Borough Local Plan (2018) was submitted for examination in March 2018. As set out in paragraph 5.1 of this Statement some weight can be given to the emerging Plan in accordance with paragraph 216 of the Framework.

5.5.2 **Policy CC1 (Presumption in Favour of Sustainable Development)** reiterates the presumption in favour of sustainable development as set out in the National Planning Policy Framework.

- 5.5.3 **Policy CC6 (Accessibility and the Intensity of Development)** states that *'the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations'*
- 5.5.4 **Policy CC7 (Design and the Public Realm)** states that all new development must be of high quality design that maintains and enhances the character and appearance of the surrounding area. Proposals will be assessed against the following urban design objectives; character, continuity and enclosure, quality of the public realm and provision of green infrastructure and landscaping, ease of movement and permeability, legibility, adaptability and diversity. Amongst other things development proposals will also be required to respond positively to their local context, create safe and accessible environments and be visually attractive.
- 5.5.5 **Policy EN1 (Protection and Enhancement of the Historic Environment)** states that *'all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance.'*
- 5.5.6 **Policy EN6 (New Development in a Historic Context)** requires development proposals in areas characterised by heritage assets to make a contribution to the historic character *'by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development'*.
- 5.5.7 **Policy H2 (Density and Mix)** sets out the need for an appropriate residential mix which will be informed by the following criteria;
- *the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;*
 - *its current and future level of accessibility by walking, cycling and public transport;*
 - *the need to achieve high quality design;*
 - *the need to maximise the efficiency of land use; and*

- *the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers*

5.5.8 **Policy H3 (Affordable Housing)** requires sites which deliver 5-9 dwellings to provide 20% provision of the total dwellings in the form of affordable housing.

5.5.9 **Policy H5 (Standards for New Housing)** sets out a criteria for new housing.

5.5.10 **Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging)** states that '*development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.*'

5.5.11 **Policy RL1 (Network and Hierarchy of Centres)** identifies a network of centres. Relevant to the determination of this application is Reading which is identified as a Regional Centre.

5.5.12 **Policy RL2 (Scale and Location of Retail, Leisure and Culture Development)** requires development proposals for retail to comply with the relevant tests set out in the National Planning Policy Framework.

5.5.13 **Policy RL5 (Impact of Main Town Centre Uses)** requires development proposal that include more than 1,000 sq m of new or additional floorspace for a main town centre use in an edge of centre or out of centre location to demonstrate that it would not significantly impact the identified centres.

5.5.14 **Policy RL6 (Protection of Leisure Facilities and Public Houses)** seeks to protect leisure facilities and public houses unless the following can be demonstrated;

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. Unless the site is a sports or recreation facility, the impacts on amenity of residents or on crime and security 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.

5.5.15 Policy OU5 (Shopfronts and Cash Machines) requires shopfronts to respect the character of the building on which they are located and the surrounding area.

5.5.16 Policy CR2 (Design in Central Reading) sets out a criteria which applications for development within Central Reading should demonstrate attributes of. Amongst other things it includes providing frontages that engage with the street scene and ensuring architectural details and materials are of high quality and respect the surrounding area.

5.5.17 Policy CR6 (Living in Central Reading) sets out a criteria which development proposals for residential development in central Reading will be assessed against. Amongst other things this includes providing a mix of unit sizes, demonstrating that the issue of potential noise and air quality will not negatively impact the residential development and meeting the requirement to provide affordable housing.

5.6 National Planning Policy Framework

5.6.1 The National Planning Policy Framework (NPPF) was published in 2012 and sets out the Governments Planning Policies for England. At the heart of the Framework there is a presumption in favour of sustainable development. Paragraph 7 of the Framework outlines the three dimensions to sustainable development which includes an economic role, a social role and an environmental role as outlined below;

- An economic role – involves amongst other things contributing to creating a strong, responsive and competitive economy.
- A social role – has regard to supporting strong, vibrant and healthy communities with accessible local services and creating a high quality built environment.
- An environmental role – involves protecting and enhancing natural, built and historic environment.

5.6.2 Paragraphs 18 to 22 of the Framework outlines the Government's commitment to building a strong, competitive economy by securing economic growth in order to create jobs and

prosperity. Paragraph 19 states that the *'government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth'*.

- 5.6.3 Paragraph 24 outlines that a sequential approach should be applied to planning applications for main town centre uses that are not situated within an existing centre and not in accordance with an up-to-date Local Plan. The Framework includes retail development in its definition of main town centre uses. Local Planning Authorities should require such uses to be located in town centres, then edge of centres and only if suitable sites are not available should out of centre sites be considered. It goes on to state that preference should be given to accessible sites which are well connected to the town centre.
- 5.6.4 Furthermore, paragraph 26 requires impact assessments to be submitted in support of proposals situated outside of town centres and not in accordance with an up-to-date Local Plan. The default threshold for requiring the assessment is 2,500 sq m. However, Local Planning Authorities may set a local floorspace threshold.
- 5.6.5 Section 6 of the Framework sets out the need to deliver a wide choice of high quality homes. Paragraph 49 specifically states that *'housing allocations should be considered in the context of the presumption in favour of sustainable development'*.
- 5.6.6 Paragraph 50 states that in order to deliver a wide choice of high quality homes, increase opportunities for home ownership and create sustainable inclusive and mixed communities Local Planning Authorities should plan for a mix of housing needs and identify the range of housing that is required for particular locations.
- 5.6.7 The importance of good design is outlined in paragraphs 56 to 68 of the Framework. Amongst other objectives decisions should aim to ensure that developments will add to the quality of an area and encourage a strong sense of place. Notably paragraph 60 states that planning decisions *'should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'*

- 5.6.8 Paragraph 70 of the Framework seeks to ensure that planning policies and decisions deliver the social, recreational and cultural facilities and services the community needs. As part of which planning decisions should *'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'*.
- 5.6.9 In accordance with the overarching aim of achieving sustainable development paragraph 111 sets out the requirement for decisions to *'encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.'*
- 5.6.10 Section 12 of the Framework sets out the Government's policies for conserving and enhancing the historic environment. Notably paragraphs 128 and 129 requires that applicants describe the significance of any heritage assets affected by proposals, including any contribution made by their setting, and that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.
- 5.6.11 Paragraph 173 states that *'to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'*

6.0 EVALUATION

6.1 Sustainability

- 6.1.1 The proposal would constitute 'sustainable development' in accordance with local and national planning policies. Firstly, the development would involve the effective and efficient use of land by re-using a previously developed site and delivering a new viable use which would be appropriate for its location. As set out in paragraph 3.1 of this Statement the Application Site is situated in close proximity to (and comfortable walking and cycling distance of) Reading Town Centre which offers a wide range of facilities and services to meet the day-to-day needs of the local community, as well as employment. The Town's

major employment areas can also be accessed via buses operating from the Town Centre (see next paragraph).

6.1.2 The Application Site also has good access to public transport. A pair of bus stops are located approximately 120m to the east of the site. They provide frequent and reliable connections to Reading Town Centre, University of Reading, Purley on Thames, Tilehurst and Calcot. Reading West train station is situated approximately 475m to the west, which is again within comfortable walking distance. The station provides connections to Reading Station and thereby to locations further afield such as London Paddington (35 minutes) (and shortly to Central and East London via the new Elizabeth Line), Heathrow Airport, Bristol and the West County, Cardiff and South Wales, Oxford, Birmingham and the Midlands. The application proposal also includes provision for internal and external cycle parking. The provision of onsite secure cycle storage will actively promote and encourage healthier communities by making it more convenient for the residents and staff/customers of the ground floor unit to cycle. As such the proposal would reduce the need for people to travel by car to meet their everyday needs, which will ultimately reduce CO2 emissions. The omission of on-site car parking actively discourages use of private motor car.

6.1.3 Accordingly, the proposal complies with Policy CS24 of the Core Strategy (2008), Policy SD1 of the Sites and Detailed Policies Document (2012), Policy CC1 and TR5 of the Submission Draft Reading Borough Local Plan (2018) and the Framework, all of which seek to support sustainable development.

6.2 Termination of Public House Use

6.2.1 The proposed development would result in the demolition of the Public House which has been vacant since 2015. As set out in paragraph 3.3 of this Statement the building is of no architectural or historic merit and is having a negative impact on the character and appearance of the site and surrounding area. Moreover, prior to its closure, there was well-recorded instances of criminal and anti-social behaviour associated with the pub. Thus, in this aspect its loss would have a positive impact.

6.2.2 The public house is considered, in planning terms, to be a community facility. However, it is not registered as an Asset of Community Value under the Localism Act (2011). Policy DM15 of the Sites and Detailed Policies Document (2012) and Policy LR6 of the Submission Draft

Reading Borough Local Plan (2018) state that development which would result in the loss of a public house must demonstrate that either there is no need for the facility, the function can be adequately fulfilled by existing facilities or the impact on amenity of residents of retaining the facility could not be dealt with through other measures. Paragraph 70 of the Framework also seeks to ensure that planning decisions do not result in the loss of valued facilities where it would reduce the community's ability to meet its day-to-day needs.

- 6.2.3 The use can however be fulfilled by the existing facilities which are located in the surrounding area. Notably, there are two public houses situated within a 200m radius from the Application Site, including The Nag's Head (5 Russell Street) and The Butler (85-91 Chatham Street). In addition, as set out in paragraph 3.1 of this Statement the Application Site is within walking distance of Reading Town Centre which offers a wide range of drinking establishments, including public houses. The proposal is therefore compliant with local and national planning policies in terms of the demolition of the public house.

6.3 Principle of Residential Development, Housing Mix and the Affordable Housing Obligation

Land Use

- 6.3.1 The Application Site is previously-developed, located firmly within the Settlement Boundary and in a sustainable location. National and local policies clearly support new housing in such locations. Indeed the Local Planning Authority clearly outlined in its pre-application response dated March 2016 that the principle of residential development on the site is acceptable.

Housing Mix

- 6.3.2 The proposal would provide 6 self-contained units which is an appropriate scale and density given the sites accessibility to a wide range of facilities and services. It would comprise 4 no. 1 bedroom flats and 2 no. 2 bedroom flats. Thus, it would contribute to providing a mix of units and delivering a wide choice of high quality homes in a sustainable location.
- 6.3.3 It is submitted that the inclusion of 3 bedroom (or larger) units would *not* be appropriate given the Application Site's small size, inner-urban location on a busy main distributor road, the planned absence of on-site parking and private amenity (garden) space, thereby

rendering it unsuitable for family housing. Indeed the letter prepared by Haslams states that *'for a scheme of this size we would recommend one beds only as there is good demand, it keeps the price point down/affordable, and it would improve your return.'* It goes on to state that *'we would strongly recommend that no 3 bed units are included. The reason being is that there is no demand for 3 bed apartments anywhere in Reading and certainly not in this location.'*

Affordable Housing

- 6.3.4 In accordance with Policy DM6 of the Sites and Detailed Policies Document (2012) the proposal is required to provide 20% affordable housing provision. In order to assess the viability of the proposal the Applicant instructed Intali to prepare a Statement of Economic Viability. The appraisal calculated that the output developer profit is 10% when measured against Gross Development Value (GDV). This calculation assumes no affordable housing and includes CIL contributions in line with Reading Borough Councils charging schedule. This is significantly below the accepted benchmark level of 20%, which provides 'competitive returns' in accordance with paragraph 173 of the Framework. The Statement of Economic Viability has been submitted as part of the application.
- 6.3.5 Notwithstanding the above, although the proposal does not offer Affordable Housing within the current definition in the Framework, the development is likely to provide low-cost market housing for rent attractive particularly to young single adults.

6.4 Principle of A1/A2/A3 Use at Ground Floor

- 6.4.1 The proposed ground floor unit is a main town centre use. Thus, local and national planning policies require that a sequential approach is adopted when determining the application. In this case the Application Site is situated in an edge of centre location, which for retail purposes is defined in the Framework as *'a location that is well connected and up to 300 metres of the primary shopping area'*. Accordingly, the planning application has been supported by a Retail Sequential Assessment which determines if there are any sequentially preferable sites in Reading that could reasonably accommodate the proposed development. It is considered that the parameters of the Assessment is appropriate and proportionate and flexibility has been demonstrated on issues such as format and scale in

accordance with the Framework. In summary the Assessment concluded that there appears to be no sequentially preferable sites.

6.4.2 The Framework also states that *'when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre'*. As outlined in section 3.1 of this Statement the Application Site is situated in a highly accessible location that is well connected to Reading Shopping Area, thus preference should be given to the site in accordance with the national policies.

6.4.3 Policy DM14 of the Sites and Detailed Policies Document (2012) and RL5 of the Submission Draft Reading Borough Local Plan (2018) set a local floorspace threshold of 1,000 sqm for requiring development proposals to consider impact on identified centres. The proposed retail unit would be 106 sqm and therefore there is no requirement to address impact.

6.4.4 Nevertheless, given the very small scale of the retail element of the development it is not likely, in any event, to have any impact on the vitality and viability of Reading Town Centre as a whole. A unit of this very small size, location and absence of customer parking is most likely to function as a purely (walk-in) local shop meeting the day-to-day needs of the immediate local population.

6.5 Merits of the Design and its Appropriateness in Context

6.5.1 As outlined in Section 5 of this Statement, local planning policies require that development is designed to a high quality and it seeks to maintain and enhance the appearance of the character of the site and surrounding area. However, as set out in paragraph 60 of the Framework the Local Planning Authority should not seek to impose architectural styles or particular tastes through substantiated requirements to conform to certain development forms and styles.

6.5.2 It is contented that the existing Public House is having a negative impact on the street scene and the proposed replacement building has been sympathetically designed to ensure that it is in keeping with the site and surrounding area and responds well to its prominent corner location. In particular, the design seeks to maintain the existing build line along Oxford Road and provide an active frontage at ground floor level. Indeed, the design of the

proposed building has been heavily shaped by the ongoing consultation since the first pre-application enquiry was submitted to Reading Borough Council in January 2016. Further details of this are set out in Section 4 of this Statement, the Design and Access Statement and the adjoining Consultation Report.

- 6.5.3 Thus, the proposal complies with Policy CS7 of the Core Strategy (2008), Policy RC5 of the Reading Central Area Action Plan (2009), Policy CC7 and CR2 of the Submission Draft Reading Borough Local Plan (2018) and the National Planning Policy Framework.

6.6 Impact on Neighbouring Amenity

Overlooking

- 6.6.1 With regards to neighbouring amenity the main consideration is how the proposal will impact 10 Trinity Place situated to the rear/north. First and foremost the proposed development will not result in overlooking which would be harmful to the residential amenity of Trinity Place because the proposed openings which serve the rear of the residential unit are high level windows. Furthermore, with respect to 120 Bedford Road it is considered that the proposed buildings western elevation is positioned an acceptable distance away to ensure that overlooking would not be significantly harmful to the occupiers.

Overbearing

- 6.6.2 The proposal has been designed to ensure that it will not result in an unacceptable overbearing impact on 10 Trinity Place. This has been achieved by incorporating a two storey flat roof element to the rear to provide a greater separation between the two properties. The rear of the existing building is two stories with a pitch roof and it is therefore considered that the two storey element to rear will not result in a material increase in overbearing impacts when assessed against the existing arrangements.

Sunlight and daylight

- 6.6.3 As a result of the pre-application process the proposed development has been amended significantly and amongst other things this has included reducing the volume and height of the building. In order to assess the proposals impact on overshadowing a daylight and

sunlight assessment has been prepared by Robin Ashley Architects LLP. The Assessment concludes that whilst the proposal would result in some reductions in daylight and sunlight to the adjacent property, the impacts would not be significant and they will be within the limits expected for the city centre.

6.7 Transport (including absence of on-site parking provision)

- 6.7.1 A Transport Statement prepared by Local Transport Projects has been submitted in support of the proposal. The Statement concludes that the site is located in a position which is well served by sustainable modes of transport. In addition, the local highway network is considered to provide a suitable environment to encourage cycling trips and sufficient cycle parking has been provided on site. As such, the Statement concludes that it is acceptable for the scheme to provide no parking spaces.
- 6.7.2 Furthermore, the analysis of the TRICS database has identified that 36 two-way person trips could be generated in the 12 hour period (0700-1900). It is anticipated that the proposed ground floor unit would result in negligible level of vehicle trips as trips are expected to be linked to existing trips to Reading Town Centre.
- 6.7.3 The Statement goes on to conclude that *'based on the person trip generation projections, it is considered that the proposed development should not have a detrimental impact on the operation of the local highway network. The relevant test is that development "should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe" (DCLG, 2012). The projections of this TS indicated that the proposed scheme will not have a severe transport impact, therefore the proposed development is in accordance with the 'National Planning Policy Framework' (DCLG, 2012).'*

7.0 HERITAGE ASSESSMENT

- 7.1 This Heritage Assessment aims to satisfy the requirements of Paragraphs 128 and 129 of the National Planning Policy Framework (NPPF) which requires that applicants describe the significance of any heritage assets affected by development proposals, including any contribution made by their setting, and that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, taking account of the available evidence and any necessary expertise.

- 7.2 There is also a statutory duty, under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 for local planning authorities, in considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The statutory duty conveys the need to have special regard to the desirability of preserving the setting.
- 7.3 Section 12 of the National Planning Policy Framework (Paragraphs 126 – 141) sets out the policies for conservation of the historic environment.
- 7.4 The application site is outside the Russell Street/Castle Hill Conservation Area and therefore development is not required to meet the statutory test under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which states that special attention should be paid to the desirability of preserving or enhancing the character and appearance of conservation areas. A conservation area is, however, a designated heritage asset and the NPPF states under Paragraph 132 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. This proposal is within the setting of the Russell Street/Castle Hill Conservation Area.
- 7.5 The relevant Development Plan policies relating to the Historic Environment are Policy CS33 of the Reading Core Strategy (2008), and Policies EN1 and EN6 of the Draft Reading Borough Local Plan (March 2018, which are explored in more detail in attached Section 5 of the Planning Statement.
- 7.6 'The Setting of Heritage Assets – Historic Environment Good Practice Advice Planning Note 3 (Second Edition)' (Historic England, December 2017) advises a staged approach to proportionate decision taking and recommends a series of steps when considering development proposals in the setting of a heritage asset. These steps are outlined below:
- Step 1: Identify which heritage assets and their settings are affected.
 - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset.

- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.

7.7 This stepped approach will be utilised in this assessment of the impact of the mixed use retail and residential development on the setting of the heritage assets listed below.

The application site and the proposed development

- 7.8 The application site is the former Royal Public House which is located on the corner of Bedford Road and Oxford Road. Whilst the public house represents the historical development of the area, as a mid-19th century building, it is not a fine example of its type and has no special architectural detailing. It is also currently vacant and deteriorating in condition, making a negative contribution to the street scene and detracting from the settings of the heritage assets.
- 7.9 Located to the north and north-west of the public house is modern residential development which is a mixture of three and four-storey flats constructed from red brick. Directly to the west of the public house is the wide road junction and carriageway of the Bedford Road and to the east is the existing 118 Oxford Road "Richer Sounds" building which is a modern, glass fronted, three-storey cube. The proposed new building addresses the corner plot, maintaining the existing building line onto Oxford Road and is a mixture of four-storey and three-storey with a traditional mansard roof with dormers. The ground floor has been designated for retail use, with residential on the remaining storeys. It will be constructed from red brick to match the existing context with a natural blue slate roof, which matches the buildings in the immediate vicinity. Large glazed openings at ground floor form the retail element of the scheme.
- 7.10 In terms of scale, form, detailing and materials, the proposed development would be in keeping with the surrounding built context. The proposed fenestration reflects the vertical emphasis, rhythm and proportions of the windows of the listed terraces opposite and is therefore sympathetic to local character and distinctiveness of the area.

Step 1: Identify which heritage assets and their settings are affected

The following heritage assets are in the vicinity of the proposed development at 2 Bedford Road:

North Side of Oxford Road

118 Oxford Road - Grade II listed

124 Oxford Road - Grade II listed

120/122 Oxford Road - Grade II listed

Church of the Holy Trinity - Grade II listed

South side of Oxford Road

171-177 Oxford Road - Grade II listed terrace

149-169 Oxford Road - Grade II listed

139 – 141 Oxford Road - Grade II listed

The Russell Street/Castle Hill Conservation Area

- 7.11 It is considered that given, the intervening 20th century development, distance and inter-visibility between the heritage assets and the application site, only the following heritage assets have the potential to be affected by the proposal:

- 149-169 Oxford Road - Grade II listed
- 171-177 Oxford Road - Grade II listed terrace
- 120/122 Oxford Road - Grade II listed
- 124 Oxford Road - Grade II listed
- The setting of the Russell Street/Castle Hill Conservation Area.

Significance

- 7.12 The NPPF defines significance as: *“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence but also from its setting.”*(NPPF – Annex2: Glossary).

Setting

- 7.13 The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. (NPPF – Annex 2: Glossary).
- 7.14 The significance of the Grade II listed 149-169 Oxford Road, 171-177 Oxford Road, 120/122 Oxford Road and 124 Oxford Road mainly relates to the age of the buildings, the quality of the traditional materials and their use, the architectural details and their historic role in the historic development of the area. The setting of these buildings is the Oxford Road which contributes little to significance.
- 7.15 **The Russell Street/Castle Hill Conservation Area** was designated in 1974 and an appraisal was produced by The Conservation Studio in April 2004. The Conservation Area Appraisal defines the following features as important to the special character and appearance of the Conservation Area:
- The Conservation Area is the product of late 18th and 19th century development.
 - Castle Hill is the principal street, notable for its varying width, hilly topography, and substantial Georgian buildings which lie on either side.
 - Front gardens and mature trees make a major contribution to views along Castle Hill.
 - Residential suburbs to south contain listed terraces of early 19th century terraced houses (Coley Hill) and detached or semi-detached late 19th century houses (Castle Crescent) in leafy gardens.
 - Residential suburbs to the north are more urban in character, with continuous terraces of early- to late-19th century houses, set on the back of the pavement.
 - Grid pattern of streets with Baker Street (which predates the early 19th century development of this area) cutting across this pattern.
 - Oxford Road is more varied with more commercial uses and the best quality listed terraces to the west.

- 7.16 The proposed development will have no impact on the special character of the Conservation Area, as defined above, nor will it impact on any important viewpoints highlighted in the appraisal.

Step 2: Assess the degree to which settings make a contribution to the significance of the heritage asset

- 7.17 Oxford Road forms the immediate setting of the heritage assets listed above. It is a wide and busy road with an eclectic mixture of commercial and residential buildings dating from the 19th century but interspersed with many 20th and 21st century buildings. The buildings fronting the road have changed considerably since the mid-19th century; therefore, as the setting to the heritage assets, Oxford Road currently does not represent the original setting of the listed buildings. The significance of the designated assets relates primarily to their date, use of traditional materials and architectural details, where setting makes little contribution to significance.

Step 3: Impact of the Proposed Development on Significance

- 7.18 Proposed new developments in close proximity to heritage assets can impact on their significance by the inclusion of the development in the view towards and from the asset. It is considered that the scale, form and materials of the proposal is in keeping with the surrounding built form and will not alter the visual relationship or views between the heritage assets and Oxford Road.
- 7.19 The significance of a heritage asset is derived not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced. The immediate setting of the heritage assets is Oxford Road, which is a wide and busy main road lined with a huge variety of commercial, retail and residential buildings. The views along Oxford Road, the surroundings in which the heritage assets are experienced, will not be altered by the new development at 2 Bedford Road.
- 7.20 In making an overall assessment of the impact of the proposed development on the setting and hence significance of the heritage assets, it is important to note that the important components of significance, such as the fabric and architecture of the buildings, would be

unaffected. The proposed new development replaces an existing building and views at the junction of Bedford Road and Oxford Road would not be materially altered.

Step 4: Maximise Enhancement

- 7.21 The proposed development is of a scale, form and materials that are sympathetic to the area and represent a positive contribution to the street scene.

Summary

- 7.22 For the reasons given above, it is concluded that the proposed development will have a positive impact on the street scene on the corner of Bedford Road and Oxford Road, as it replaces a derelict and run down building of limited architectural interest. The proposal has been carefully and sensitively conceived and preserves the setting of the listed buildings and the setting of the Russell Street/Castle Hill Conservation Area, leaving their settings unharmed. The proposal therefore accords with Sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 12 of the NPPF and Policy CS33 of the Reading Core Strategy (2008), and Policies EN1 and EN6 of the Draft Reading Borough Local Plan (March 2018).

8.0 CONCLUSION

- 8.1 The proposal constitutes sustainable development and complies with relevant local and national planning policies. The derelict brownfield site will be regenerated to a high standard to provide a retail unit and 6 residential units which will contribute to meeting the acknowledged acute overall housing need in Reading and providing mix of housing that is appropriate to the Site, its location and the constraints to which it subject. Therefore planning permission should be granted subjected to appropriate planning conditions.



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