
17-27 Queen Victoria Street, Reading

Planning Statement

April 2017

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Planning Statement

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1.0 INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Pepa Holdings 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 office to residential use comprising 15 x 1 bed flats and 4 x 2 bed flats”

- 1.2 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) and advice given by Matthew Burns, the pre-application case officer.

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

Supporting Documentation:

- Completed Application Form
- Completed CIL Compliance Form
- Planning Statement, prepared by Barton Willmore (dated April 2017)
- Design and Access Statement, prepared by Scenario Architecture (dated March 2017) (includes: landscape principles; material details; open space statement; transport assessment and travel plan; and, vehicle parking and services detail)
- Heritage Statement; prepared by WYG (dated February 2017)
- External Building Fabric Report, prepared by RBA Acoustics (dated 27th March 2017)

- Air Quality Assessment, prepared by Acoustic Air (dated February 2017)
- Energy (SAP) Analysis Report, prepared by CES (dated March 2017)
- Utilities Statement, prepared by CES (dated March 2017)

- 1.3 The application has been prepared in consultation with Officers at Reading Borough Council.
- 1.4 This proposal presents the opportunity to deliver 19 new homes in a highly sustainable location. In addition, it will constitute a compatible, appropriate use for the Listed Building.

Structure of Planning Statement

- 1.5 **Chapter 2.0** of this statement (The Application Site and Surroundings) details the physical characteristics of the Application Site and its immediate surroundings.
- 1.6 **Chapter 3.0** (Planning History) sets out the planning history of the site.
- 1.7 **Chapter 4.0** (The Proposed Development) provides details of the Proposed Development.
- 1.8 **Chapter 5.0** (Pre-application Advice) sets out the response to the pre-application advice which has been sought from Reading Borough Council.
- 1.9 **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.
- 1.10 **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.
- 1.11 **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 Centre Area, Central Core, Primary Shopping Area, Office Core and Existing Active frontage as designated by the Reading Central Area Action Plan (AAP). 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 19th 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:

- 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 (26th 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 (24th August 2006).

3.2 The above demonstrates that the principle of a change of use from office to residential has been established as acceptable.

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 residential and the internal alterations and reconfigurations necessary to form 19 independent residential units. The description of development is as follows:

“Proposed change of use of first, second and third floor from office to residential use comprising 15 x 1 bed flats and 4 x 2 bed flats”

- 4.2 The proposed development represents a good opportunity for a sustainable residential-led development within a listed building. The proposal does not include any extensions or material external alterations to the exterior of the listed building. In summary, the proposal will facilitate the delivery of 19 new homes in Reading Town Centre.

5.0 PRE-APPLICATION ADVICE

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

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

5.2 Over the course of the correspondence above, the proposal has undergone significant alterations in order to address the concerns raised by Matthew Burns and Jon Mullis. In particular, the proposal as initially presented to the Council included extensions to the rear of the listed building. These have been omitted from this application. The proposal has also been 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 It is understood from the Council's website that Reading are in the process of producing a new Local Plan. The Issues and Options consultation took place between January and March 2016. A draft plan is expected for regulation 18 consultation April – June 2017 and regulation 19 consultation November – December 2017. Adoption is expected January 2019.

National Planning Policy Framework

- 6.4 Relevant national planning policy guidance can be found in the Framework which was published on the 27th March 2012, making key reforms to the planning system.
- 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 14 of the Framework highlights that at the heart of the Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through 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 17 of the Framework sets out the core land-use planning principles that should underpin decision-taking. Bullet point 3 requires that decision-takers should support sustainable economic to deliver homes and every effort should be made to meet the housing needs of an area and respond positively for wider opportunities for growth. This application is consistent with delivering this principle.
- 6.8 Paragraph 17, bullet point 10 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

- 6.9 Paragraph 19 of the Framework 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. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

Promoting Sustainable Transport

- 6.10 According to Paragraph 29 of the Framework, transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.

Delivering a Wide Choice of High Quality Homes

- 6.11 In line with Paragraph 47 of the Framework local planning authorities should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing.

- 6.12 According with Paragraph 49 of the Framework housing applications should be considered in the context of the presumption in favour of sustainable development.

Requiring Good Design

- 6.13 Paragraph 56 of the Framework outlines how the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Planning Practice Guidance (PPG)

- 6.14 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.
- 6.15 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.
- 6.16 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.”
- 6.17 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.
- 6.18 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

6.19 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)

6.20 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.

6.21 **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.

6.22 **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 be CIL liable.

6.23 **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?

6.24 **Policy CS14** (Provision of Housing) of the CS states that provision will be made for the completion of an average of 521 dwellings per annum in the period 2016-2026. Changes of use and conversions are listed as a source of this supply. The delivery of 19 residential units at the application site will assist the Council in meeting their housing delivery target and will make a valuable contribution towards the Borough's overall housing stock

6.25 **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. Insert brief comment as to how we comply with this policy.

6.26 **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.

6.27 **Policy CS18** (Residential Conversions) states that proposals to convert properties into self-contained flats will be assessed against the on the amenity and character of the surrounding area. Particular regard will be given to any loss of privacy, loss of external amenity space, the provision and allocation of on site car parking and the treatment of bin storage areas.

- 6.28 **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.
- 6.29 **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.
- 6.30 **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)

- 6.31 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.
- 6.32 **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.
- 6.33 **Policy DM1** (Adaption to Climate Change) requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 6.34 **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.

- 6.35 **Policy DM5** (Housing Mix) states that on new development for 10 or more dwellings outside of the central area and defined district and local centres, planning decisions will ensure that over 50% of the dwellings will be of 3 bedrooms or more with the majority of units delivered as houses rather than flats. The policy does not provide any housing mix standards for units within the central area. The proposal site is within the central area so the provisions of this policy are not relevant to the considerations of the proposal.
- 6.36 **Policy DM6** (Affordable Housing) relates to development proposals of 15 dwellings or less and is therefore not relevant to this proposal.
- 6.37 **Policy DM8** (Residential Conversions) states that proposals to convert properties into self-contained flats will only be acceptable where:
- The proposal respects the physical character of the area and would not harm an existing community through the loss of family housing;
 - There are no unacceptable adverse impacts to other residential properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;
 - There is appropriate sound insulation between propose and neighbouring units and layouts avoid inappropriate stacking and location of rooms between units;
 - Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access;
 - At least 25% of the units formed should be suitable for family occupation with a minimum of two bedrooms; and
 - Individual units provide appropriate minimum internal floor standards and headroom in accordance with the Council's adopted minimum internal floorspace standards.
- 6.38 **Policy DM10** (Private and Communal Outdoor Space) requires dwellings to be provided with functional private or communal open space. Flats may be provided with communal outdoor space, balconies and/or roof gardens. The supporting text for the policy, paragraph 5.6.5 states that flats in central Reading will not requires the same amount of outdoor space as flats in central Reading and tend to be more constrained. It goes on to states that the needs of residents within central Reading are different to those in the rest of the borough and less likely to attract families. It also notes that residents in central Reading will have the ability to walk to nearby public open space.

- 6.39 **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).
- 6.40 **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)

- 6.41 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.
- 6.42 The site falls within the following areas designations of the RCAAP: Primary shopping area, central core, office core and existing active frontage.
- 6.43 **RC9** (Living in the Centre) requires proposals for residential development within the central area to contribute towards a mix of different sized units with ideally a mix of one, two and three bed units provided. The policy also states that proposals for residential development within the central area will have to demonstrate how the issues of potential noise disturbance and air quality have been considered and mitigated where necessary.

Community Infrastructure Levy (adopted April 2015)

- 6.44 We understand that in accordance with the adopted Charging Schedule, residential development is liable for a charge of £120 per sqm of new floorspace. Whilst this proposal does not involve the creation of and new or additional floorspace, it does involve bringing back into use 166 sq.m of floor space which has been vacant since October 2008. It is understood that this aspect of the proposal is the only component that will be liable for CIL on the basis that the remaining floor space has been in lawful use for at least six months within the previous three years. A completed CIL form is provided with the application.

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 residential units 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. 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, some of 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, there would not be an opportunity for a comprehensive redevelopment scheme.

- 7.6 In respect of the fifth point, there is a shortage of available land for housing within Reading and the housing need is acute; thus, the delivery of 19 no. new units as an alternative use is entirely justifiable particularly when considered against the level of available office space in the immediate surrounds.
- 7.7 Given the above, 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 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

- 7.9 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. 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

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

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

7.11 **Noise.** Due to the town centre location, the case officer for the pre-application requested that a noise assessment should accompany any forthcoming planning application. 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 residential space and between residential units. It is understood that these measures will be incorporated within the development.

7.12 **Internal Space.** The Council does not have adopted minimum room sizes for any type of residential conversion. Certain standards are referred to in the Council's Residential Conversions Supplementary Planning Document however this document specifically relates to conversion of existing residential properties to HMO's. In this instance the proposal relates to the conversion of existing office units to residential use. Nonetheless this and nationally prescribed technical housing standards document (also not adopted) provides a useful guide for dealing with conversion of properties from non-residential uses.

7.13 The national technical housing standards (not adopted by RBC) advise that to provide a 1 bed flat suitable for 2 people, 50m² of internal floor space should be provided. 5 of the 15 x 1 bed flats fall marginally below this level by approximately 1m². This shortfall is due to the constraints of working within the existing listed building. Given that the Council

does not have adopted minimum floorspace standards, the outlook/daylighting arrangements and the careful design and layout of the units which ensures that the space functions well and would not lead to a feeling of overcrowding, it is not considered that the proposed internal areas would be contrary to policy or would lead to a materially harmful impact on the amenity of future occupiers. The floorspace of the remaining 10 x 1 bed units and 4 x 2 bed units exceeds the national technical housing standards. As such, it is not considered that the very minor short fall in a small proportion of the units should be deemed sufficient to warrant a refusal of planning permission.

- 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 occupiers 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 occupiers 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. This is consistent with the supporting text (paragraph 5.6.5) to policy DM10 which states that the needs of residents within central Reading are different to those in the rest of the borough and less likely to attract families and that residents in central Reading will have the ability to walk to nearby public open space. As such, the lack of amenity space for this proposed change of use in a town centre location is not considered to be inconsistent with policy.

Mix of Units

- 7.18 The proposal seeks permission for a total of 19 units comprised of 15 x 1 bed units and 4 x 2 bed units. CS15 encourages an 'appropriate' mix of units but does not specify exact standards. Policy DM5 provides standards for new development of 10 or more dwellings outside of the central area and defined district and local centres. The site is located within the central area and, as such, the standards set out within DM5 are not relevant to the consideration of this application.
- 7.19 RC9 (Living in the Centre) of the RCAAP (2009) states that development will be required to contribute towards a mix of different sized units and provides a guide for developments as follows: "in developments of 15 dwellings or more, a maximum of 40% of units should be 1 bed, and a minimum of 5% of units should be at least 3-bed". It should be noted that the policy states that these standards are a 'guide' rather than a requirement. DM8 (Residential Conversion) of the SDPD (2012, 2015) states that "at least 25% of units formed should be suitable for family occupation with a minimum of 2 bedrooms". There is a conflict between these policies in terms of the expected mix and proportion of units.
- 7.20 In this instance, it is considered that the standards set out in DM8 of the SDPD are more appropriate. This is because a residential conversion of an existing unit creates a specific set of challenges due to the need accommodate well-functioning residential units within an existing built envelope. In addition, SDPD was also adopted more recently (2012) than the RCAAP (2008) and, in accordance with Section 38(5) of the Planning and Compulsory Purchase Act (2004) conflict must be resolved by the decision maker favouring the policy which was most recently adopted.
- 7.21 21% of the units comprised within the proposal have 2 bedrooms. This falls marginally below the 25% standard set out in policy DM8. This is due to a combination reasons including the constraint associated working within the listed building, viability considerations and the town centre location. As noted within Policy DM10, sites with a town centre location are less likely to attract families. In addition, due to the restricted nature of the site neither outdoor amenity space nor parking are deliverable. As such, it is not considered that the proposal would be attractive for family living and a smaller proportion of family units is considered a reasonable approach.

Sustainable Design and Construction

- 7.22 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

- 7.23 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

- 7.24 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 any external alterations.

Affordable Housing

- 7.25 No affordable housing contribution is proposed as part of this development (neither on-site provision or payment in lieu) given the significant costs required to convert and refurbish the Grade II Listed Buildings.
- 7.26 This position is supported by the Financial Viability Assessment of the proposed development produced by Haslams Surveyors LLP which will follow this submission.

Community Infrastructure Levy

- 7.27 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 Pepa Holdings Ltd for the proposed change of use of first, second and third floor from office to residential use to create 19 new residential units.
- 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 dwellings 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.