TOWN & COUNTRY PLANNING ACT 1990

BEENLORE LTD

PLANNING, HERITAGE AND DESIGN AND ACCESS STATEMENT

104 LONDON STREET
READING
RG1 4SJ

Conversion of existing office building, and 1-bed flat into 5-bed 6-Person small HMO, including cycle and bin store to rear

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1. INTRODUCTION

1.1 This Planning, Heritage and Design and Access Statement is submitted in support of a full application by Beenlore Ltd for the conversion of existing office building, and 1-bed flat into 5-bed, 6 person small HMO including cycle and bin store. The applicant intends to submit an application for listed building consent for internal alterations proposed to the building.

1.2 This statement will set out how the proposed change of use and conversion to a small HMO is acceptable in principle and is consistent with local and national policy including the preservation of the conservation area and the buildings special historic interest. In particular, it will be demonstrated that the proposal will respect the character and appearance of the surrounding area and that of the existing building. The statement will demonstrate that the proposal will safeguard the amenity of neighbouring occupiers and that it is acceptable in terms of its highway impacts. Furthermore, the submission is sustainable and will make a small contribution towards the Council's windfall housing provision.

1.3 The remainder of this statement is divided into 7 main sections dealing with the following issues:

- Site and Surrounding Area
- Planning History
- Planning Policy Context
- The Application Proposal
- Heritage Statement
- Design and Access Statement
- Summary and Conclusions

2 THE SITE AND SURROUNDING AREA

2.1 The application site comprises a three-storey building located within a long terrace comprising of buildings of varying ages and designs. The building is Grade II listed and is within the Market Place / London Road Conservation Area. It is currently in use as offices, with a self-contained one-bedroom flat on the ground floor at the rear of the building. The existing flat has its own access onto St Giles Close to the rear. The existing offices are accessed from London Street and currently have no access to the rear space.

2.2 The surrounding area comprises mainly of three storey terraces, with many of the buildings being statutorily listed. The area comprises of a mix of uses, including ground floor commercial uses and residential houses and flats.

2.3 The site lies within the defined urban area of central Reading in a highly sustainable location close to the town centre with its extensive range of services and transport links. The efficient use of the site meets Policies CC1 of the LP and the NPPF (efficient use of land) which encourages efficient re-use of buildings and land.

3 PLANNING HISTORY

3.1 The planning history of the site is set out below:

920104 – Refurbishment of property to facilitate change of use to offices with retention of residential unit to rear. Approved 30 July 1992.

920420 – Change of Use from residential to offices at front and formation of self-contained one bedroom flat at rear. Refused 30 July 1992.

920742 – Alterations to facilitate a change of use from residential to offices. Approved 30 July 1992.

920816 – Change of use from residential to offices. Refused 30 July 1992.

930684 – Change of Use from residential to offices with minor alterations. Refused 26 October 1993.

161786 - Change of use of building from Class B1(a) (offices) to C3 (dwellinghouses) to comprise of one dwelling with 3 lockable bedrooms. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Decline to determine 22 September 2016.

4 PLANNING POLICY CONTEXT

i) Government Guidance - National Planning Policy Framework 2023

4.1 The NPPF sets out the Government's planning policies and how these should be applied. It confirms that applications should be determined in accordance with the development plan unless material considerations indicate otherwise (paragraph 2). The NPPF must be taken into account in the preparation of the development plan and is a material consideration in planning decisions.

4.2 Paragraph 7 of the NPPF states that the purpose of the planning system is to achieve sustainable development. There are three overarching objectives to sustainable development which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental objectives. The environmental objective includes the need to make efficient use of land and to improve biodiversity. So that sustainable development is pursued in a positive way, at the heart of the National Planning Policy Framework is a presumption is favour of sustainable development (paragraph 10). Paragraph 11 confirms that plans and decisions should apply a presumption in favour of sustainable development.

4.3 Paragraph 38 states that Local planning authorities should approach decisions on proposed development in a positive and creative way and that decision makers at every level should seek to approve applications for sustainable development where possible.

4.4 Chapter 11 is concerned with making effective use of land. Paragraph 123 states that planning policies and decision should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 124 states that policies and decisions should, amongst other requirements achieve the following:

- Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs;

- Promote and support the development of underutlised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

4.5 Paragraph 128 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

- Local market conditions and viability;

- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

- The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

- The importance of securing well-designed, attractive and healthy places.

4.6 Paragraphs 131 - 141 are concerned with design. It states that good design is a key aspect of sustainable development. Paragraph 135 states that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- Establish a strong sense of place;

- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development;
- Sympathetic to local character and history, including the surrounding built environment and landscape setting;
- Are visually attractive as a result of good architecture layout and appropriate and effective landscaping.
- Create safe and accessible environments which promote health and well-being, with a high standard of amenity for existing and future users.

4.7 Section 16 of the NPPF is concerned with conserving and enhancing the historic environment. Paragraph 195 confirms that these assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

4.8 Paragraph 203 states that in determining applications, LPA's should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

4.9 Paragraph 205 of the Framework states 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. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

4.10 Paragraph 208 of the Framework confirms that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

ii) The Development Plan

Reading Borough Local Plan 2019

4.11 Policy CC1 - Presumption in Favour of Sustainable Development. States that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which means that proposals can be approved wherever possible.

4.12 Policy CC7 – Design and the Public Realm. States that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form include: layout; landscape; density and mix; scale (height and massing); and architectural details and materials. These will be assessed to ensure that the development makes a positive contribution to 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; Diversity.

4.13 Developments will be assessed to ensure that they, amongst other matters:

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;

- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

4.14 Policy CC8 – Safeguarding Amenity. Requires that development does not result in a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; Crime and safety. The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate.

4.15 Policy H1 – Provision of Housing. Confirms that provision will be made for at least 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2012 to 2036. Of the 689 homes per annum, small scale unidentified sites (i.e. <10 units) are expected to contribute 127 homes per annum (18.5% of the annual requirement).

4.16 Policy H3 – Affordable housing. On sites of 1-4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough. Where proposals fall short of the policy target as a result of viability considerations, an open book approach will be taken with the onus on the applicant to demonstrate the circumstances justifying a lower affordable housing contribution.

4.17 Policy H8 – Residential Conversions. Proposals to convert buildings into self - contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing. In areas covered by an Article 4 direction, planning permission will not normally be granted where the proportion of HMOs will result in HMOs representing 25% or more of the residential properties within a circle of 50m radius measured from the application site.

4.18 Policy EN1 – Protection and Enhancement of the Historic Environment. Historic features, areas of historic importance and other elements of the historic environment,

including their settings will be permitted and where possible enhanced. 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 avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits. Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

4.19 Policy EN3 – Enhancement of Conservation Areas. The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character and conservation areas.

4.20 Policy EM3 – Loss of Employment Land. States that in areas which are not Core Employment Areas, the following matters will be considered when assessing proposals which would result in a loss of employment land:

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

ii) Is the continued use of the site for employment, including the potential for redevelopment for employment use, viable?

iii) Is there a surplus of a similar size and type of accommodation in Reading?

iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

v) Is the need for alternative uses stronger than the need for the retention of employment land?

vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme.

4.21 Supporting paragraph 4.3.14 advises that each application will need to be assessed on its merits, and the matters to be considered under i) to vi) should inform a balanced decision, not be used as a checklist where every item is fulfilled.

iii) Supplementary Planning Documents

Affordable Housing (adopted March 2021)

4.22 Confirms that the affordable housing policy will not be applied to student accommodation, residential care of other specialist provision falling within the C2 use class. The policy will also not apply to changes of use between a single dwelling house and a house in multiple occupation where unrelated residents live communally and share common facilities within the single residential property. In respect to HMOs it will only be applied where they are new-build.

5 THE APPLICATION PROPOSAL

5.1 The proposal provides for the conversion of existing office building, and 1-bed flat into 5 bed, 6-person small HMO, including cycle and bin store to the rear.

5.2 The key considerations are therefore considered to be as follows:

- The principle of development;
- Design, character and appearance, including its effect on the existing building, a non-designated heritage asset;
- Housing density, type and mix;
- Amenity of adjoining occupiers and new occupants;
- Access and parking provision;
- Trees and ecology;

i) Principle of development

5.3 The application site is located in the defined urban area of Reading. It is in a highly sustainable location close to a range of services, amenities and transport links. Whilst it is acknowledged that the site is located within an area covered by an Article 4 Direction preventing the change of use from a single dwellinghouse to a small HMO, there is, in theory, no objection in principle to this type of residential use in this location.

5.4 As set out within the planning history chapter, the building was last in use as offices, with a residential flat on part of the ground floor which will be incorporated into the new use providing an additional bedroom as well as additional communal facilities (bathroom and kitchen). Policy EM3 sets out a number of matters which will be assessed when considering proposals which would result in the loss of an employment use. Supporting paragraph 4.3.14 advises that each application will

need to be assessed on its merits, and the matters to be considered under i) to vi) should inform a balanced decision, not be used as a checklist where every item is fulfilled. These criteria are considered below.

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

Response: The site is located in a location with good access to public transport. However, it is likely that a small HMO will generate considerably fewer movements than the existing office use.

ii) Is the continued use of the site for employment, including the potential for redevelopment for employment use, viable?

Response: The building is statutorily listed and its layout and lack of accessibility to people with mobility issues makes it impractical for continued employment use.

iii) Is there a surplus of a similar size and type of accommodation in Reading?

Response: The latest AMR (December 2023) confirms that the emphasis should be on protecting existing employment land. In terms of small employment units it highlights the area south of Basingstoke Road as being the main area for employment space retention. Online searching for office floorspace availability within Reading indicates that there is a healthy supply of existing office units available in modern, up-to-date buildings.

iv) Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

Response: No.

v) Is the need for alternative uses stronger than the need for the retention of employment land?

Response: The provision of a small HMO in this location, close to public transport routes, provides for strong justification. The Council is currently seeking to locate new employment floor space further to the south.

vi) Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme.

Response: There is no potential for a more comprehensive form of employment development/floor space at the site.

5.5 In terms of meeting Policy H8, the proposal would not result in any physical external changes to the building, only internal. There is no inappropriate stacking proposed and all floorspace is accessible. Cycle storage is provided at the rear of the building in a timber store.

5.6 An online search on the Council's HMO register for properties within 50m of the application site has not revealed any existing HMOs within the qualifying distance. The proposal therefore meets Policy H8.

5.7 The building is a Grade II listed building. The listing description confirms that the original use of the building was as a dwelling. The proposal would reinstate residential use thereby reflecting the historic use of the building. The proposal would secure a viable use within the building which should be afforded significant weight.

5.8 As a balanced judgement, having regard to all of the above matters, the proposed change of use from offices and a small flat to a small HMO is considered acceptable in principle. The proposal would be supported by Policies CC1 and H1 of the LP and by the National Planning Policy Framework (i.e. making more efficient use of sites). It should be noted in particular that this proposal meets indent (d) of paragraph 124 of the NPPF which states that planning decisions should *'promote and support the development of under-utlised land and buildings'.* The proposal is also consistent with Policy CC6 which seeks to relate scale and density to accessibility.

ii) Design, Character and Appearance, including the effect of the proposal on the existing Grade II listed building and on the Market Place / London Street Conservation Area.

5.9 The listing description confirms that the original use of the building would have been as a dwelling and the proposal therefore reinstates a residential use which is in keeping with the existing character and appearance of the building and the mixed residential and commercial character of the surrounding area.

5.10 No extensions are proposed to the building. Internally, there are some minor works proposed which include re-instating a door into the existing flat and removing existing doors to facilitate the incorporation of the existing flat into the HMO. A small timber cycle store is also proposed in the rear amenity area. The proposal therefore would have no materially harmful effect on the character and appearance of the listed building or its historic significance. Furthermore, there would be no adverse effects on the character or appearance of the conservation area which would be preserved.

5.11 In conclusion, the proposed change of use would not have an adverse effect on the character and amenity of the area and would comply with LP Policies CC7, EN1, EN3 and H8 of the adopted local plan as well as the general design and heritage objectives set out in the NPPF.

iii) Amenity of adjoining occupiers and new occupants

5.12 The proposal does not involve any extensions or external alterations (only internal) to the existing building and the proposed residential use would be consistent with the mixed residential / commercial character of the surrounding area. Therefore, the proposed development would not result in material harm to the living conditions of neighbouring occupiers as required by Policies CC8 and H8 of the LP.

5.13 The proposed small HMO would provide suitable accommodation and living space for future occupiers, with each room benefiting from an appropriate outlook. All residents will have access too the rear amenity areas. Local Plan Policies CC8 and

H8 and paragraph 135 (f) of the NPPF are met as there would be no significant detrimental impact to the living conditions of existing or future occupiers.

iv) <u>Access and Parking provision</u>

5.14 The site is within central Reading, in a highly sustainable location where car-free residential development is considered appropriate. A new cycle store is proposed in the rear amenity area.

6 HERITAGE STATEMENT

6.1 The existing building dates from 1820. It has a narrow rectangular form on plan, orientated east/west with its principal elevation facing London Street. It is constructed in red brick in Flemish bond with stone and composite stone dressings. The rear elevation is grey brick with red brick dressings. The windows opening hold sash frames. The hipped roof is covered with plain tiles and there are two ridge stacks.

6.2 The architectural interest of the building is as an early C19 building which contributes to the character of an architecturally varied historic streetscape which forms part of the Market Place / London Street Conservation Area. Its historic interest is as part of the urban development of Reading's ancient core. The building also has group value, being in close proximity to a large number of listed buildings and forms part of a strong historic grouping.

6.3 The proposal involves minimal internal changes to the building which are all connected with the integration of the existing flat into the HMO. This includes new matching doors, making good following removal of existing doors, matching plasterwork, and new stud walls. It is clear that the rear flat was once used in conjunction with the main building and therefore these changes would re-instate a the original residential use and layout.

6.4 Having regard to the above factors, the proposed change of use would not result in any harm to the significance of the listed building and would preserve the character or appearance of the CA. There is no requirement to consider any public benefits as there is no material harm to its significance.

7 DESIGN AND ACCESS STATEMENT

7.1 Layout: The layout of the proposal respects the layout of the existing building which is Grade II listed and through the integration of the rear flat, its historic layout. The proposed change of use can be accommodated within the building with minimal internal alterations. The existing 1no. one bedroom flat on the ground floor is subsumed into the proposal to generate a 5 bed 6 person small HMO.

7.2 Use: The proposal is for the change of use of the building from offices and flat to a small HMO. This is consistent with the existing residential use on the ground floor of the building and its historic use.

7.3 Amount: As stated above, the proposal is for a small HMO (five rooms) to accommodate 6 residents.

7.4 Scale: The proposal does not involve any extensions and the scale of the building is unchanged.

7.5 Appearance: No external alterations are proposed to the appearance of the building.

7.6 Landscaping: The site is currently devoid of any landscaping. There is some opportunity for new planting at the rear of the site.

7.7 Access: The HMO would be car free which is appropriate given the highly sustainable location within central Reading. A new timber cycle store is proposed at the rear of the building.

8 SUMMARY AND CONCLUSIONS

8.1 The application proposal is for the change of use of the building from offices and a flat to a small HMO. The application should be supported for the following reasons:

i) The site lies within the defined urban area of Reading in a highly sustainable location close to a range of services and transport links. The efficient use of the site meets Policies CC1 of the LP and the NPPF (efficient use of land) which encourages efficient re-use of buildings and land.

ii) The proposal is not in conflict with Policy H8 (residential conversions) or Policy EM3 (loss of employment land). The change of use would not result in more than 25% of properties being in HMO use. In terms of Policy EM3, it is clear that the Council direct employment uses towards Basingstoke Road and areas to the south and that in general there is no shortage of office space. It is also clear that the layout of the building lends itself far better to the proposed use than the existing office use where most business now seek purpose-built office floor space. The incorporation of the existing flat into the HMO re-instates the building to its former use.

iii) The proposed change of use involves minimal internal alterations and accordingly, will respect the character and appearance of the existing Grade II listed building and preserve the character and appearance of the Market Place / London Street conservation area. The proposal complies with LP Policies EN1, EN3 and CC7 and the design/heritage objectives of the NPPF. There is no requirement to demonstrate public benefits.

iv) The residential use of the building would not result in any loss of amenity to neighbouring occupiers and ensures a high standard of amenity for future occupiers. The proposal therefore accords with Policies CC8 and H8 of the LP and paragraph 135 (f) of the NPPF in this regard.