Planning and Heritage Statement

13-15 Station Road, Reading

Prepared For

Faye and Yara Limited

2557

February 2023

Including:
- Sustainable Drainage Information
- Sustainability Statement
- Waste storage and collection

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1 INTRODUCTION

1.1 This Planning and Heritage Statement is submitted in support of planning and listed building consent applications submitted by Faye and Yara Limited (the site owners) for the part conversion of 13-15 Station Road, Reading from an office (Class E) to residential (Use Class C3). The proposal is to convert the first to fourth floors into 7 flats. The lower-ground floor and ground floor will remain in office use.

1.2 The property, 13-15 High Street, is a grade II Listed Building. The listing entry dates the building to 1903, noting it is a *"similar exuberant mixture of Baroque Art Nouveau and Flemish styles… Very Elaborate. 3 Storeys and attic. Red and yellow glazed brick with terracotta enrichment to front only. Tiled roofs. 2 bays, tripartite sash windows. Bracketed oriel on 2nd floor to left. Enriched crows step gables of differing heights. Modern shop front."*

1.3 Whilst the front of the building is historic and matches the listing description, the floor plate and rear of the building are modern, office construction and the ground floor has a modern shop frontage as noted in the Listing entry.

1.4 The majority of the building is currently vacant/ underused, with two floors occupied by Chiltern Training. Chiltern Training has historically occupied the whole building as their head office. However, in 2016 Chiltern Training consolidated their use of the building and began looking for a sub-tenant to use some of their vacant space, but this five and a half year long market exercise was unsuccessfully.

1.5 Chiltern Training's lease for the whole building will expire in 2024, and given their consolidation in 2016 and failure to subsequently find a tenant for the vacant floors, they have begun negotiations with Faye and Yarn (the owners and applicants) and made it clear their intention is to only continue to lease two floors of the building, leaving the rest of the building vacant. Hicks Baker Commercial Property, the agents who marketed the first floor for Chiltern Training, advised that there is little to no prospect of finding replacement commercial occupiers for the space (this position is explained in detail in their accompanying report) and therefore an alternative use is sought.

1.6 This statement provides support for the planning application and listed building consent providing a Planning and Heritage Statement which sets out the justification for the proposed redevelopment in the current planning context.

2 LOCATION AND SITE DESCRIPTION

2.1 The application site is located in central Reading, a few minutes' walk from Reading Station. The building is located on the western side of Station Road. It is located between two modern buildings, both taller in height.

2.2 The building is five storeys in height. It was built in circa 1903 and the front façade has a mixture of Baroque and Art Nouveau style, with a more modern (and contrasting) shop front at street level as shown below.

Image 1: Station Road Elevation

2.3 Behind the building is a modern reinforced concrete framed structure with modern bricks to the rear and modern windows as shown on the photo below.

Image 2: Rear elevation

2.4 To the rear there is a small courtyard that is enclosed by a brick wall and secure gate. The courtyard can be accessed from Gerrard Street. The buildings to the rear are between 10 and 15 storeys high and contain residential apartments and a hotel.

Image 3: Rear courtyard

2.5 Internally the building is a modern floor plate. There are large open plan areas with some dividing walls. There are no features of historic or architectural interest. The Station Road elevation is the only historic (or significant) part of the building and there is the inside profile of the historic windows but, even then, little architectural detailing (see example images below).

Image 4: Vacant internal office space

Image 5: internal view of windows on the front facade

Image 6: internal view of windows on front facade

2.6 The historic, artistic and architectural significance of the building, for which it is Listed, only relates to the Station Road façade, as can be seen from the photographs above and read in the Listing description. Whilst we acknowledge that the whole building is listed, there is nothing of any merit beyond the front elevation.

2.7 The building has fallen into some disrepair due to the lack of a viable long term use, as can be seen in the images below:

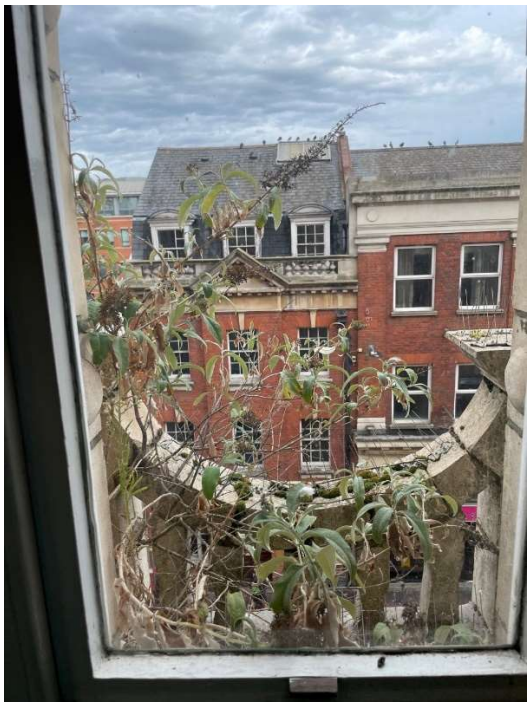

Image 7: Photograph showing how the lack of maintenance has resulted plants growing in the Station Road façade of the building.

Image 8: modern shop front in need to maintenance

RELEVANT PLANNING HISTORY

2.8 Reading Borough Council's online planning register has been searched for any relevant planning history. The most recent application dates to 2004, prior to the occupation of the building by Chiltern Training.

2.9 The historical use of the building has been as a head office of Chiltern Training and for the purposes of this application, and as there is no evidence on the planning register for an alternative use, as such this application will be treated as the conversion of office space (class E) to residential.

3 PROPOSED DEVELOPMENT

3.1 The proposal is for the conversion of the first to fourth floors of the property to residential use to create one two-bedroom apartment on the fourth floor and six one-bedroomed apartments on the first to third floors. The lower ground and ground floor will remain in office use although some space on the lower ground floor will be utilised to provide additional storage areas for the residential dwellings above.

EXTERNAL CHANGES

3.2 There are no external changes proposed.

3.3 The building has two external doors on to Station Road, one will be used for office accommodation and the other for the residential accommodation.

INTERNAL CHANGES

3.4 The internal changes will see the removal of partition walls and their replacement with new partitions. The partition walls that will be removed are not of historic value and form part of the modern office accommodation.

3.5 The existing lift and stair core will remain and be adapted for the new use. Again, these are not historic features.

3.6 The application is accompanied by a noise and air quality survey and report. The result of the survey work is that double glazing is required on the Station Road frontage and a means of mechanical ventilation and filtration is required. The proposal therefore includes secondary double glazing to the internal windows on the Station Road façade and plant on the roof in relation to the ventilation systems required. It should be noted that there is already plant on the roof associated with ventilation of the office building and therefore the proposed development will replace these existing units.

3.7 There are no proposed changes to the historic facade. As such, the historic, artistic and architectural qualities of the building will be preserved by the proposed development as the Station Road façade remains unchanged externally. Securing a long-term viable

use for the building will ensure that the front façade is conserved and maintained in the future, providing protection for this heritage asset.

4 PLANNING POLICY CONTEXT

4.1 Section 70 of the Town and Country Planning Act 1990 and 38(6) of the Planning And Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless other material considerations indicate otherwise.

4.2 In the case of this application, the relevant adopted development plan consists of:

- Reading Borough Local Plan adopted November 2019

4.3 In addition, the Residential Conversion Supplementary Planning Document is a material consideration. It was adopted in 2013, prior to the Local Plan, so its references to policies are out of date, and it is noted that the Council are in the process of replacing the document.

4.4 A further and important material consideration is the National Planning Policy Framework (NPPF 2021) which sets out the Government's up to date strategy and guidance for plan making and decision taking.

PRINCIPLE OF DEVELOPMENT

4.5 Policy EM3, loss of employment, seeks to resist the loss of employment land, particularly in the Core Employment Areas, although the supporting text to the policy acknowledges that *"there is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in right locations"* (paragraph 4.3.12). The supporting text explains this is why core employment areas have been identified and provided with an additional level of protection, as are important to the local economy. The site is not located in a Core Employment Area.

4.6 Outside Core Employment Area, policy EM3 provides six matters to be taken into account in the consideration of proposals resulting in the loss of employment land. These are broadly the:

i. Accessibility of the site

ii. Viability of the continued use of the site for employment

iii. Whether there is surplus of a similar size and type of accommodation in Reading

iv. Potential impact of the continued employment use on neighbouring residents

v. The need for the alternative use verses the need for employment land

vi. Is there potential for a more comprehensive development

4.7 In this case the relevant considerations are the continued viability of the use of the site for employment, the alternative types of accommodation in Reading and the need for employment land verses the need for new homes.

4.8 At the outset it is acknowledged that the site is in an accessible location, so criterion (i) is not relevant/passed (depending on how it is viewed), and as a town centre location, there are already a mix of uses within the area and the employment use is unlikely to have a negative impact on residential amenity and character. Equally, Station Road and the surrounding area contains a variety of different buildings, some that have recently been converted and redeveloped so there is unlikely to be a comprehensive scheme for redevelopment of the area, ever less likely given the heritage assets of the area.

4.9 Turning to the relevant criteria, and firstly, viability. The application is accompanied by a supporting marketing report. For a period of five and a half years Hicks Baker marketed the part of the building (subject to this application) for let. During that period of marketing no tenant was successfully found for the space.

4.10 The Hick Baker report also provides details of alternative accommodation available, that has been refurbished, yet still remains unlet and details the surplus office accommodation in Reading and new office space under construction at Station Hill.

4.11 The report explains that 13-15 Station Road has inherent limitations and it does not meet standards modern office occupiers are looking for. Meeting these requirements would require a significant investment. Hicks Baker conclude even if this significant investment was made their view is that this would not improve the chances of achieving

a letting to a commercial tenant, concluding that the property is *"no longer a viable commercial asset".*

4.12 In regard to need, the NPPF sets out the imperative to *"significantly boost the supply of land for housing".* The supporting text to policy H1, provision of housing, acknowledges that there is a *"pressing need for additional housing in Reading"(*paragraph 4.4.1). The provision of new housing in Reading *"involves a heavy reliance on previously developed land"* (paragraph 4.4.3) and within the policy there is also a reliance on windfall developments, the plan requiring 127 windfall dwellings to be delivered per annum to reach the housing target set out in the plan. However, this target does not meet all the assessed housing need for the Borough, falling short of meeting that need by 230 dwellings. As such the Local Plan effectively relies on sites such as this (windfall sites) to bring forward new homes, but even with windfall development it will not meet the objectively assessed housing need. There is a clear imperative to deliver housing in Reading and this need clearly outweighs the need for the office accommodation as demonstrated by the number of years parts of the building have been vacant with no suitable tenant found.

4.13 It is also relevant to note that in January 2013 that the Government introduced permitted development rights for the conversion of office accommodation to residential to help meet the need for new homes, stating that the new permitted development rights will *"make a valuable contribution to easing our national housing shortage"* (Rt Hon Lord Pickles, Written Statement to Parliament Change of use: promoting regeneration 24 January 2013). 13-15 Station Road does not benefit from these permitted development rights for this change of use as it is a Listed Building, but as described above, in section 3, the changes that result as part of the proposed development will not impact on the historic features for which the building is listed.

4.14 Nevertheless, the creation of the permitted development rights for the conversion of office buildings to residential accommodation gave a clear intention from the Government in relation to the need make the most efficient use of land and ensure the delivery of new homes to meet local needs.

4.15 Government policy, last updated in July 2021, continues to reflect the urgent need to deliver new homes to meet local needs (paragraph 60 of the NPPF) and the need to *"promote and support the development of under-utilised 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"* (paragraph 120 d or the NPPF). The proposed development is entirely in accordance with the aims of Government policy.

4.16 Having assessed all the relevant factors, there is clear evidence to demonstrate that the principle of the conversion of the office accommodation to residential dwellings is acceptable in terms of policy EM3 and guidance set out in the NPPF.

HERITAGE ASSET

4.17 Policy EN1, protection and enhancement of the historic environment, seeks to protect and where possible enhance Listed Buildings among other historic features. The policy requires development proposals to avoid harm in the first instance but where there is harm identified, the policy requires *"clear and convincing justification, usual in the form of public benefits"*.

4.18 Policy EN6, new development in a historic context, refers to the historic character of an area, requiring new development to contribute to the historic character of the area.

4.19 The proposed development will retain the historic Station Road façade of the building including both its historic and architectural features. The proposed works to building are internal and impact on the modern office floor plate only. There is a minor addition, in the inclusion of secondary double glazing internally on the front façade but this is a secondary element, not directly linked to the frontage or the windows and will not impact the building when viewed from then front. The visual character of the building from the public domain will be retained (and enhanced given the decline of the frontage in recent years – see above).

4.20 The works, and particular the long-term future use of the building, will protect the historic features of the façade and ensure their long-term protection and are therefore entirely in accordance with policy EN1.

DESIGN

4.21 Policy H5, standards for new housing, sets out standards which new homes should comply with unless it makes the development unviable. Most of the requirements are not relevant to this proposal as the scheme is within the central area and is not for new build housing or major development. However, the proposed development does meet nationally described space standards and as such complies with requirements of this policy.

4.22 Policy H8, residential conversion, provides guidance for the conversion of buildings into self-contained flats and for multiple occupation. In this case the criteria relating to self-contained flats is relevant.

4.23 The proposed development will meet the criteria as:

- The proposal will reflect the physical character of the area as there are no external changes proposed to the front of the building. There is a mixture of uses in the area and therefore the conversion of part of the building will not impact on physical character of the area.

- There is no loss of family housing as part of the proposed development.

- There is no adverse impacts to residents of the proposed development or who live in neighbouring buildings as demonstrated by the noise and air quality reports accompanying the planning application.

- There is no inappropriate stacking, bedrooms are all located above each other, and are not located above, below or next to neighbouring living in, bathrooms or kitchens. The internal layout has been carefully considered to deliver an appropriate living environment for the new residents, meeting national described space standards.

- Bin and cycle storage has been carefully considered through the design process to ensure it is useable. Each apartment has its own dedicated area for cycle and refuse storage. Whilst this is not at ground floor level, each floor has access to a lift and as the storage is in the flats themselves it is safe and secure.

- The internal floor space meets nationally described space standards.

4.24 The proposed development therefore full accords with the requirements of policy. In addition, it reflects the guidance provided by the Residential Conversion SPD as follows:

- The proposed development provides a mix of one and two bedroomed flats and will contribute to the creation of a sustainable community through the re-use of a vacant building (checklist 3).

- Residential amenity has been considered through the adaption of the building. The application is accompanied by noise and air quality reports which ensure appropriate mitigation will be provided to ensure these are not an issue. As town centre flats there is no amenity space provided but outside public amenity space is accessible within a short walk of the property (checklist 4 and 5).

- The flats meet national described space standards (checklist 7)

- The layout avoids stacking, the proposed bedrooms are set away from neighbouring living rooms, bathrooms and kitchens (checklist 9).

- All habitable rooms benefit from external windows (checklist 10).

- The proposed development achieves headroom of over 2.15m on all floors, including the fourth floor, where the head room is 2.47m, which is in accordance with the headroom set out in checklist 12 for attic / loft space in asterisk ***.

- The proposed development is car-free owning to its highly accessible location in the town centre and proximity of public car parking spaces, as explained in detail in the Transport Statement (checklist 13).

- Cycle storage is provided in excess of standards, with one space for each dwelling, and cycle storage will be created for the remaining office space in the rear courtyard (checklist 16).

- Refuse collection is from Station Road on a weekly on-street sack collection basis. Each dwelling has its own refuse storage and residents will be response for taking their refuse to the street on collection days (checklist 17).

- One of the units meets checklist 23 providing 2 bedrooms.

AFFORDABLE HOUSING

4.25 The NPPF is very clear, at paragraph 63, that *"affordable housing should not be sought for residential development that are not major developments"*. This application, being less than 10 dwellings, is not a major development and therefore the position is clear that affordable housing contributions should not be sought.

4.26 However, Policy H3, affordable housing, sets a policy target that developments of 5-9 dwellings should make a financial contributions equivalent to 20% of the housing to be provided as affordable housing elsewhere in the borough, subject to viability considerations. If viable and subject to the above NPPF consideration, the proposed development will make the requisite financial contribution, and the applicant will provide an open-book assessment if the contribution is not viable.

SUSTAINABLE DESIGN AND CONSTRUCTION / SUSTAINABILITY STATEMENT

4.27 Policy CC2, sustainable design and construction, requires development proposals to use resources appropriately and efficiently and take account of the effects of climate change. To meet this requirement, conversions are required to incorporate water conservation measures.

4.28 As explained in the Design and Access Statement, section 7 Sustainability, the scheme will meet sustainability credentials in several ways. Not least, as a conversion, the proposed development will bring back into use an existing building. The proposed development will look to exceed Building Regulation requirements and meet water

efficiency measures, improving on the environmental credentials of the existing building and as such will comply with the requirements of CC2.

TRANSPORT

4.29 Policy TR1, achieving the transport strategy, seeks to achieve the objectives of the transport strategy, which includes facilitating more active travel, reduce carbon emissions form transport and enable sustainable transport choices. The Transport Statement accompanying the application explains that the site is in a highly sustainable location, with a wide range of facilities, services and transport choices within walking distance.

4.30 Policy TR5, car and cycle parking and electric vehicles charging, requires car and cycle parking to be provide that is appropriate to the location. As noted in the Transport Statement, the site is in a highly accessible town-centre location with a range of active and sustainable modes of transport on offer. Like many town centre developments, due to the accessible location the proposed development is car-free. Cycle parking is provided which exceeds standards required with one cycle parking space per dwelling and new cycle provision for the remaining office accommodation. As such the development provides appropriate car and cycle parking provision given the town-centre location.

FLOOD RISK ASSESSMENT AND SURFACE WATER DRAINAGE / SUSTAINABLE DRAINAGE STATEMENT

4.31 The application site falls within flood zone 1 and is therefore within the lowest risk area for flooding potential.

4.32 As an existing building the sites drainage will remain the same as existing. The proposed development will not create any additional areas of hardstanding and will not alter surface water drainage from the site.

WASTE STORAGE AND COLLECTION STATEMENT

4.33 As set out in the Transport Statement, refuse collection is proposed to be undertaken from Station Road, with a weekly on-street sack collection, which is the same as other

neighbouring properties. Each flat has a dedicated waste storage area, where waste can be kept until collection day and then taken to the street by residents.

5 HERITAGE STATEMENT

5.1 Listed Buildings benefit from the highest level of protection under the provision of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.2 Section 16(2) of the Act then sets out the basic legal tests for the decision maker requiring that *"in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or tis setting or any features of special architectural or historic interest which it possesses"*.

5.3 A listed building is considered to be a designated Heritage Asset as defined by the National Planning Policy Framework (NPPF).

5.4 'Significance' is the means by which the cultural importance of a place and its component parts are identified and compared, both absolutely and relatively. It is defined in the NPPF as:

> *"the value of a heritage asset to this and future generations because of its heritage interest. The 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 Glossary page 71 and 72).

5.5 Significance is essential for effective conservation management because the identification of areas and aspects of higher and lower significance, based on a thorough understanding of a place, enable proposals for change to be developed which protect, respect and where possible enhance a building's character and cultural values.

5.6 The assessment of significance can assist in identifying areas where only minimal changes should be considered, as well as locations where change might be acceptable and enhance understanding and appreciation of the building's significance. Changes need to be carefully considered to ensure that significant features are not compromised and will be judged with the legislative context governing the historic environment.

5.7 Further advice for a decision maker continues in section 16 of the NPPF, paragraph 189 confirms that heritage assets are an *"irreplaceable resource and should be conserved in a manner appropriate to their significance"*. The NPPF confirms 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 (and the more important the asset, the greater the weigh should be)"* (paragraph 199). Paragraph 200 confirming that "*any harm to, or loss of, significance of a designated heritage asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification"*.

5.8 Paragraph 202 of the NPPF confirms that *"where proposals lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use"*, paragraph 197 also noting the in the determination of planning application account should be taken of *"the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation"*.

5.9 The key consideration for the proposed development (in heritage terms) is the impact of the proposed development on the Listed Building and its significance. The next section described the Listed Building in more detail to assess its significance and provide an understanding of the impact on that significance of the listed building.

ASSESSMENT OF THE LISTED BUILDING

5.10 As noted earlier in this statement, the Listed Building details specifically focuses on the street elevation of the building, although it notes there is also a modern shop front. Internally, the building has a modern floor plate and except for the windows on the internal face of the street façade, there are no historic, artistic, or architectural features relating to the original building.

5.11 From a significance perspective, it is only the street façade that is of any historic and architectural value. Internally the modern floor plate and rear modern brick walls and windows have no significance to the Listed Building.

IMPACT ON THE LISTED BUILDING

5.12 The proposed development will not make any changes to the Station Road façade of the building. Internally, secondary double glazing is provided on the internal elevation of that façade. The existing windows and glazing will be retained. As such no changes are proposed that would affect the valued aspects of the building. Therefore, there is no harm as a result of the proposal to the Listed Building.

5.13 If, in the event, the decision maker determines there is harm to the significance and value of the Listed Building, the first judgement to make is about the significance of that harm. Given the conclusion of this report, and that the NPPF indicates substantial harm relates to the total loss of significance or destruction of the building (paragraph 200 to 201), it must follow that if harm is identified then that harm must be categorised as less than substantial, since there are no changes to the Listed Building's façade and the only internal change that could impact the Listed elements is the secondary double glazing, which by its very nature will have a very limited impact.

5.14 Nevertheless, if the decision maker considers this to be the case, the NPPF guides the decision maker that *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use"* (paragraph 202). In this case, there are several public benefits from the proposed development, which include:

- Bringing the vacant part of the building back into its optimum viable use. The Station Road façade has fallen into some disrepair and a more viable use will inevitably result in an improvement of the maintenance of the building both now and in the future. It is desirable, in the public interest, to ensure the significance and value of the building is conserved for future generations. The proposed development will help to secure this by the creation of a long-term viable use.

- The provision of seven flats will also make an important contribution to the provision of new homes in Reading. As noted above, the Reading Local Plan states that there is a *"pressing need for additional housing in Reading"*

(paragraph 4.4.1) and policies in the plan rely on windfall sites such as this to help to meet the housing need.

- The re-use of this vacant and under-utilised building will help to ensure the continued vibrancy and viability of the town centre, ensure the use of a vacant and underutilised building.

5.15 The benefits of the proposal therefore sufficiently outweigh any harm that the Council could possibly conclude as resulting from the proposal.

5.16 We maintain the position that there will be no harm and the proposal passes the legal tests of preserving the building and its special architectural and historic interest, in addition to providing the significant benefits listed above.

6 CONCLUSION

6.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that planning application should be determined in accordance with the development plan unless material considerations indicate otherwise.

6.2 The principle of development is supported by policies in the Reading Local Plan.

6.3 In terms of the heritage asset, the proposed development does not affect the external Station Road façade and therefore the proposed development will not alter the character of the Listed Building.

6.4 There are no overriding technical obstacles to the development and the proposals have been carefully considered to create seven new apartments, providing much need housing in a sustainable location in the town-centre.

6.5 The proposed development will secure the optimum viable use for the Listed Building, ensuring its long-term conservation and maintenance, bring back into uses several floors of the building that have been vacant and underused for some years.

6.6 The benefits of the proposed development are significant and cross the three elements of sustainable development (economic, social and environmental). In accordance with the guidance in the NPPF, as a proposed development in accordance with the development plan, this application should be approved without delay.