



TOWN AND COUNTRY PLANNING ACT 1990

PLANNING AND HERITAGE STATEMENT

**Change of use from private parking to
commercial car park**

**Land at (rear of) 81 London Street, Reading,
RG1 4QA**

**Statement on behalf of
National Car Parks Limited**

September 2025

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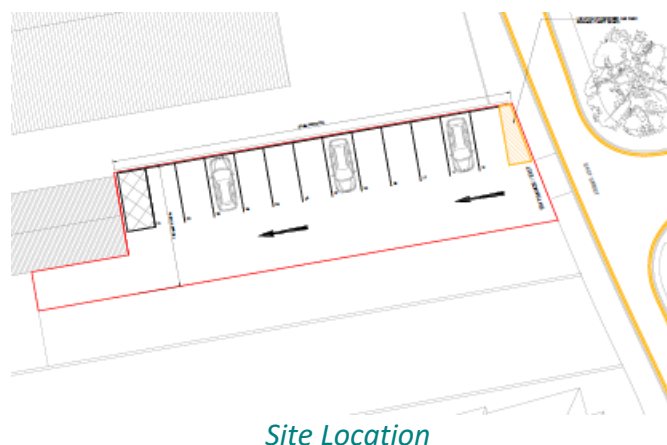
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1. INTRODUCTION

- 1.1 This Planning and Heritage Statement has been prepared in support of a planning application for the temporary change of use of land at (rear of) 81 London Street, Reading, to be used as a commercial/public car park. Permission for up to three years is sought.
- 1.2 This Statement has been requested by the planning officer. Its purpose is to review the prevailing planning policies and other material considerations that are relevant to the determination of the planning application and to present a case for granting planning permission.

2. THE SITE AND SURROUNDING AREA

- 2.1 The Site comprises an existing parking area to the rear of the property at 81 London Street with the existing access from East Street. There will be no material changes to the site to accommodate the proposed change of use for public parking as the site is an existing parking area and is adjacent to another parking area which also uses the existing access.



- 2.2 It is acknowledged that the land lies within the Market Place/London Street Conservation Area with East Street providing its eastern boundary. In addition, No81 is a Grade II Listed Building, and the listing relates to the street scape and group value in relation to other buildings on London Street. The property was built around 1800 as a town house and has a large extension at the rear of the listed building built in the late 20th Century.
- 2.3 In terms of the proposed use for the existing parking area, there are no changes which directly affect the listed building itself and there will be no change to its setting or to the appearance of the parking area. Some 10 spaces will be open to public use with the remaining three spaces retained by the landlord.

- 2.4 The Site forms part of a larger parking area which serves the adjoining building. Beyond this to the south is further parking areas associated with buildings on London Street and also at Marie Davis Court and Elizabeth Mews. To the north of the site, separated by a brick boundary wall is parking associated with the larger building and other uses. There are a mix of uses on East Street comprising both commercial and residential developments. These buildings are generally also of 3 storeys. Access is directly off East Street and no changes to this are proposed.

Market Place/London Street Conservation Area

- 2.5 The Conservation Area appraisal identifies this site as within Area 1. This states that: *'Area 1: London Street; London Street has medieval origins and is marked 'London Strete' on John Speed's 1611 map of Reading. Though many of London Street's buildings have a distinctively Georgian, and later, appearance, parts of older structures can be found including cellars made from limestone 'quarried' from Reading Abbey, possibly in the 16th century. There are a few remaining 16th/17th century buildings including nos. 49-53 London Street, listed grade II, which has an 18th century front on an earlier, timber-framed building and no. 88 London Street which has a jettied first floor to Church Street. Nos. 49/51 London Street contains 17th century paneling. In the late 18th and 19th century, London Street was one of the fashionable parts of town and many of the elegant houses which lined either side of the road still survive. Though altered, no longer in residential use and devoid of their spacious rear gardens, these are the properties which today add grandeur to the streetscene. Then, as now, the street was unusually wide. Development at the 'top' and 'bottom' of the street, beside the London Road and IDR junctions respectively, is modern. Until the arrival of the railway, London Street was the main route for coaches from the town centre to London, before they turned left into London Road. Today the street is more commercial than residential. It contains a high proportion of business and professional services. Despite the pedestrian hazard posed by the IDR which severs the area from Reading's main shopping centre, London Street contains a few specialist retail shops. The width of the carriageway has been re-aligned and re-arranged in late 20th century to accommodate lay-by parking, bus stops and pedestrian islands. South Street contains a row of brick-built terraced houses but its south side, and the west side of East Street, is predominantly modern in character and appearance.'*

Character Area 1: Features that make a positive contribution to the historic character and appearance of the conservation area:

- The unusual width of the street, which rises gently from the River Kennet with a slight eastward curve, creates a visually interesting townscape;
- The high concentration of historic buildings on either side, many of which are listed;
- The mix of architectural styles and periods with an overall majority of late 18th/19th century buildings;
- High quality townscape and well-proportioned relationship between tall building and wide street;
- The predominance of brick with occasional use of stone and stucco;
- The strong vertical rhythm created by regular bays of aligned windows and doors;
- Key buildings: No. 33 London Street, originally the Scientific Institution, 1843, by W.Brown, and Nos 73-79 London Street, described by the architectural historian Nikolaus Pevsner as the "best" of the Georgian houses;
- Side alleys and streets which afford glimpses and views to east and west;

Wide pavements; • Ten young street trees which help to soften the otherwise urban environment; • Prevalence of white-painted vertical sliding sash windows • The variety of historic architectural detail including pedimented doorcases, iron balconies and railings, timber shopfronts;

Character Area 1: Features that have a negative impact on the historic character and appearance of the conservation area: • Noise and fumes from a constant stream of traffic; • London Street is severed from town centre by the Inner Distribution Road; • Modern development at north and south extremities of London Street, adjacent to road junctions, spoils the overall historic appearance of the area; • Modern alterations to the carriageway and pavement e.g. concrete paving do not always respect the quality of the street's historic buildings; • Lack of enclosure at northern end; • Vacant commercial and retail space; • Loss of original windows and front doors to modern replacements; • Loss of original slate roofs and other architectural features such as gates and railings; • Plethora of signs and other street furniture, some of which may be redundant; • Garish shopfronts that do not respect the host building e.g. no. 45 London Street;'

- 2.6 It is clear from the appraisal the importance of London Street. There is little information or comment on the land at the rear of these properties. There has been more modern development permitted on East Street within the Conservation Area and on the east side of East Street which while it is not within the Conservation Area it has an impact on its appearance and character. The provision of car parking is extensive throughout the area.
- 2.7 The Site lies to the rear of a Listed Building as do other areas of parking off East Street. I have indicated above the details on the Listing for No81 which relates to the street scape in London Street. The large extension to the property at the rear would seem appropriate given the historic value if the older part of the building is not affected nor is the street scape. The car parking area already exists, and the proposal does not change its appearance or setting.

3. THE PROPOSAL

- 3.1 The proposal relates to the change of use of the site from an area of private car parking, to allow the land to be used for public/commercial car parking. Vehicular access will remain as per existing arrangements from East Street. Details are provided on the layout which is essentially unchanged.

4. PLANNING POLICY

- 4.1 The starting point for assessing development proposals is always the Development Plan. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states “if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 4.2 The Development Plan for this proposal consists of the Reading Local Plan adopted in 2019. A partial review of this Plan has reached pre submission stage. Essentially, the policies referred to below remain in the emerging Plan the same as the adopted Local Plan.
- 4.3 The following policies may be relevant to the application.

Policy CC1: Presumption in favour of sustainable development

- 4.4 This policy 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 (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise. Where there are no policies relevant to the application or the policies which are most important to determining the application are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise – taking into account whether: • The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or • Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.'*

Policy EN1: Protection and Enhancement of the Historic Environment

- 4.5 This policy indicates that, *'Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include: • Listed Buildings; • Conservation Areas; • Scheduled Monuments; • Historic parks and gardens; and • Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List. All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. 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. Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key*

views out from the park, or prejudice its future restoration. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement. The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers. Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision'

Policy EN3: Enhancement of Conservation Areas

- 4.6 Policy EN3 states that *'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 of conservation areas. These may include: • Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture; • Restoring original building features; • Removing inappropriate additions or alterations to buildings; • Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area; • Improving signage and street furniture; • Restoring or re-establishing appropriate paving, railings or walls; • Sympathetic landscaping and planting; • Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area; • Signage that reveals and promotes the Conservation Area and its boundaries; • Interpretation panels to inform the public of the area's historical significance. Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development.'*

National Planning Policy Framework

- 4.7 The National Planning Policy Framework guides the policies within Local Plans and forms a material consideration to determining planning applications. The paragraphs listed below are deemed relevant.
- 4.8 The NPPF recognises that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 sets out the presumption in favour of sustainable development at the heart of the Framework. In terms of determining development proposals, this means approving schemes which accord with the Development Plan without delay.
- 4.9 Local Planning Authorities should approach decisions on development in a positive and creative way and seek to work proactively with applicants to secure developments that will improve economic, social and environmental conditions of the area. Sustainable development should be approved where possible [paragraph 39].

- 4.10 Planning authorities should consider whether unacceptable development could be made acceptable through the use of conditions or planning obligations [paragraph 56]. Conditions should be kept to a minimum and only imposed where they are necessary, relate to planning, are enforceable, precise and reasonable in all other respects [paragraph 57].
- 4.11 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe [paragraph 116].
- 4.12 In determining applications, planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance [paragraph 207]. Planning authorities should take account of (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; (b) the positive contribution that conservation assets can make to sustainable communities including their economic activity; and (c) the desirability of new development making a positive contribution to local character and distinctiveness [paragraph 210].
- 4.13 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 215]. Not all elements of a Conservation Area will necessarily contribute to its significance [paragraph 220].
- 4.14 Policies in the Framework are material considerations which should be taken into account from the day of its publication. Plans may also need to be revised to reflect policy changes the NPPF has made [paragraph 231]. Due weight can be given to existing policies adopted or made prior to the publication of the Framework, according to their degree of consistency with the NPPF.

5. PLANNING HISTORY

- 5.1 While there have been various developments along Esat Street at the rear of properties on London Street, it is considered there is no relevant planning history in relation to the application site and the current proposals.

6. THE PLANNING CASE

- 6.1 This section of the Planning and Heritage Statement assesses the proposed development against the policies of the Development Plan and against all other relevant material considerations and sets out why planning permission should be granted by the Council.

- 6.2 The starting point for assessing development proposals is the Development Plan, unless material planning considerations indicate otherwise.

Principle of development

- 6.3 Essentially, the application site comprises an area of hardstanding to the rear of properties on London Street which is currently used for car parking and part of a larger parking area. The site is accessed directly from East Street. While some remarking of the spaces is proposed, this would not alter the appearance of the existing parking area.
- 6.4 The current proposal will have the same impact in terms of the scale of use as per existing, given the fact that it will continue to be used for parking cars (albeit permission is sought on a temporary basis). Vehicles will enter and leave the site spread over the day as they would do currently and as there are no material changes to the site, there is no visual impact on the street scene. The site has always been considered as acceptable for the parking of cars. As such the change of use to a public car park is de minimus with no external changes occurring. Chapter 11 of the National Planning Policy Framework promotes the efficient use of previously developed land, and the change of use to a public car park would use an area of hardstanding which is a car park. The site operating as a public car park however provides opportunities to help support the economy, over and above the baseline position. The proposal confirms with Policy CC1 of the adopted Local Plan and the emerging partial review. The principle of development is acceptable.

Heritage

- 6.5 In respect of this proposal, the use of the site will be less harmful than the use of the site for development. Under this proposal the application is merely for a change of land use. There is no harm to the character of the area. The site operating as a public car park however provides opportunities to help support the local economy, over and above the baseline position. There is a clear public benefit of the proposal. The proposal would not conflict with Policies EN1 and EN3 of the Local Plan.
- 6.6 In respect of heritage (Conservation Area) the rear elevations of the London Street properties are visible from the site but do not make a strong contribution to the significance of the Conservation Area as they are varied in design, uses and materials. The proposal does not impact on the street scape of London Street. The current car park use for the site does not make a positive contribution to the setting or significance of the listed buildings or significance of the Conservation Area. It is an empty plot which forms a physical break from the urban grain of London Street and the tarmac surface does not relate to the historic character.

Access

- 6.7 The proposal will utilise the existing access arrangements and the area of car parking. Paragraph 116 of the NPPF is clear that development proposals should only be

prevented or refused on highway grounds where there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Given there is no discernable differences between the use of land, the proposal wholly accords with the Framework.

7. CONCLUSIONS

- 7.1 This planning and heritage statement has been prepared in support of the planning application for the temporary change of use of the land to allow for public car parking. It is considered that the proposal is de minimus with no external changes occurring. Vehicular access remains as existing. The site use will not harm the setting of any heritage assets. Operating as a public car park will provide opportunities to help support the local economy and does not conflict with the Local Plan. The principle of development is acceptable.
- 7.2 The relevant planning policies have been reviewed and for all the reasons set out in this Planning and Heritage Statement the proposal accords with the Development Plan. Under Paragraph 11c of the National Planning Policy Framework this means granting planning permission without delay. The Council are respectfully invited to approve the application.



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