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Planning and Heritage Statement

Project:	Full Planning Application
Site:	10 Castle Street, Reading RG1 7RD
Date:	01 November 2021
Client:	Mr A Hayward

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A. SUMMARY AND CONCLUSIONS

1. This Planning and Heritage Statement accompanies an application for full planning permission to Reading Borough Council ("the Council") regarding a proposal for the "*Conversion of the existing building to mixed restaurant/takeaway (Sui Generis) use at ground floor and basement and 4 flats (Use Class C3)*" at 10 Castle Street, Reading RG1 7RD ("the site").

2. The proposed conversion will be a sustainable form of development within the centre of Reading and will make a meaningful contribution to the delivery of homes in the town. The proposed change of use will have no detrimental impact on the viability of businesses occupying the ground floor and basement. The proposal will also have no detrimental impact on the the amenity of adjacent occupiers, transport implications or other such effects.

3. The design of the scheme has been carefully prepared having regard to the character and appearance of the St Mary's Butts / Castle Street Conservation Area. No alterations are proposed to the front elevation of the existing building and only minor changes are proposed to the rear. The development will make a positive contribution to the character and appearance of the Conservation Area and will not harm the settings of any nearby listed buildings.

4. The proposed development is wholly in accordance with the development plan and national planning policy, and there are no material planning considerations that would indicate that planning permission should not be granted.

B. THE SITE

The Site

5. The site comprises a Grade II listed four storey plus basement building in the Abbey ward of Reading.

6. The property comprises a shop and restaurant at ground floor and basement level, and storage on the first, second and third floors. The ground floor and basement comprise a shop floor, bar / dining area, kitchen, bathroom facilities and storage spaces ancillary to its use. The upper floors were formally used as offices but the existing use is as storage. The internal arrangement of the upper floors has been altered by the insertion of temporary partition walls relating to its previous use. The upper floors are accessed via an entrance on Castle Street separate to that which serves the shop and restaurant.

7. Externally the property is red brick built with white wooden-framed windows and doors, and a grey slate mansard roof. To the rear of the property is a single storey rear infill extension with a flat roof which projects the full length of the former garden. This is not an original architectural feature of the property.

8. The site is located to the north of Castle Street and forms part of a terrace with No. 8 Castle Street and No. 12 Castle Street, which has similar, although not identical, features and is listed with the site for their group value. The rear infill extension is perpendicular to the rear of No. 34 St Mary's Butts.

9. Castle Street is characterised predominantly by commercial properties at ground floor with offices or residential uses at the upper floors. This and the wider area are characterised by a mix of modern and traditional buildings of varying sizes and scales, including the the Church of Saint Mary and Reading Magistrates Court to the west of the site.

10. The site is in a highly sustainable location. There are numerous bus stops within a 5 minute walk that are served by regular services throughout the day. Reading railway station is approximately 7 minutes walk away, with direct links to London and Bristol.

Planning Designations

- the site is located within the St Mary's Butts / Castle Street Conservation Area.
- the site is located within the 'Central Core' and 'Office Core' of Reading.
- the site lies within an Area of Archaeological Potential.
- the site lies within an Air Quality Management Area.

11. The site comprises one part of a Grade II group listing along with No. 12 Castle Street. There are a number of listed buildings along Castle Street and nearby. Those closest to the site are:

- 8 Castle Street;
- 11 Castle Street;
- 13 Castle Street;
- 15 Castle Street; and
- Church of Saint Mary.

12. There is no relevant planning history for the site.

13. There are no Tree Preservation Orders present at the site. The site is not in an Environment Agency (EA) designated flood risk zone.

C. PROPOSED DEVELOPMENT

14. The proposal is to convert the existing building (Use Class E) into a mixed restaurant / takeaway use (Sui Generis) at ground floor level and basement level and four flats (Use Class C3).

15. The ground floor and basement level will be converted from a shop and restaurant into a restaurant / takeaway and a self-contained apartment to the rear. The existing upper floor storage areas will be converted into a further three self-contained apartments with a shared cycle storage area and refuse store.

16. No material changes are proposed at ground floor and basement level where the restaurant / takeaway will be located. The existing single storey rear infill extension at ground floor level will, however, be reduced in size and reconfigured to create a single self-contained apartment and new outdoor amenity space. This will also involve the erection of a new external wall measuring 3.8 metres in height along the external boundary of the site to create a courtyard garden.

17. The existing first, second and third floors will be converted to a further three self-contained apartments. This will involve the alteration of existing internal arrangements through the removal of partition walls, many of which are temporary, and the erection of new ones.

18. The four proposed apartments will be of the highest-quality and vary in size. The proposed housing mix will consist of the following:

Apartment	Type and occupancy	Gross internal area (sq m)
A (third floor)	1-bed 2-person	61.6
B (second floor)	1-bed 2-person	56
C (first floor)	2-bed 3-person	64.2
D (ground floor)	1-bed 2-person	57.3

19. All four apartments will have a kitchen / dining / living room, bathroom and bedroom. Apartment D on the ground floor will also have access to a private courtyard garden (measuring 21.6 sq m).

20. The proposed development makes use of the existing four floors plus basement and does not involve any increase to the existing floorspace. No changes are proposed to the external facade of the building, bar the partial demolition of the single storey rear infill extension.

21. A new refuse store is proposed off of the stairwell serving the apartments between the ground and first floors. This will accommodate refuse bins for all of the proposed dwellings. The restaurant / takeaway will have a separate refuse store at basement level.

22. Due to the sites central and highly sustainable location, this will be a car free development. Storage will be provided for two bicycles in a secure space off of the entrance hallway serving the apartments at ground floor level.

D. PRE-APPLICATION ENGAGEMENT

23. The applicant sought pre-application advice for a proposal similar to that which has been submitted (LPA ref 210415/PREAPP). Written advice was issued on 14th June 2021.

24. In light of the positive feedback and advice received, the scheme submitted is not significantly different to that discussed at the pre-application stage.

25. In the written advice, the Council confirmed that the application site is:

- a four storey terraced property on the northern side of Castle Street;
- Grade II listed for its group value with the adjacent property, No. 12 Castle Street;
- located within the St Mary's Butt's / Castle Street Conservation Area; and
- within an Air Quality Management Area.

26. The Council also acknowledged that the site falls within one of Reading Borough's High Street Heritage Action Zones (HSHAZ), which forms part of a heritage-led regeneration programme led by Historic England.

27. With regards to design, the Council advised that the stacking of rooms within the proposed dwellings would not result in the most amenity friendly arrangement, and the kitchen / living room should be swapped with the bedroom and the kitchen / living room should be swapped with the bedroom in each dwelling. It advised that doing so would mean that the kitchens / living rooms and bedrooms would all be aligned vertically such that noise and disturbance would be reduced.

28. With regards to conservation and heritage, the Council advised that any future application would require a Heritage Statement detailing how the proposal as a whole would be acceptable in terms of impact to the listed building and wider Conservation Area. The Council also advised that this should address the status of the locally significant restaurant which is a key feature of Castle Street, and therefore considered to be part of the character of the site.

29. With regards to transport and accessibility, the Council advised that cycle storage should not be located on the first floor as this would not allow easy access. Instead, a more suitable location should be proposed.

30. With regards to environmental protection matters, the Council has requested that a Noise Assessment and Air Quality Assessment be provided with any future application. Moreover, the design of the proposal must include sufficient mitigation measures to reduce the impact of the proposed restaurant / takeaway use on current and future residents.

31. In light of this advice, the design of the scheme proposed at the pre-application stage has been revised and the following changes made:

- greater consideration has been made for the conservation of existing heritage assets, both within and adjacent to the site, and the surrounding Conversation Area; and
- the position of cycle storage has been relocated to the entrance hallway serving the apartments at ground floor level.

32. Further details are outlined in Sections E and F of this statement.

E. PLANNING POLICY COMPLIANCE

33. The statutory development plan for Reading Borough Council comprises:

- the Reading Borough Local Plan (2019).

34. The Council also have a number of Supplementary Planning Documents and Guidance. Those of relevance to this application are:

- Affordable Housing Supplementary Planning Document (2021);
- Residential Conversions Supplementary Planning Document (2013);
- St Mary's Butts / Castle Street Conservation Area Appraisal (2008); and
- Revised Parking Standards and Design Supplementary Planning Document (2011).

35. The National Planning Policy Framework (2021) ("the Framework") is a material consideration of significant weight.

36. The main considerations for the proposal are:

- the principle of development
- the loss of storage uses;
- the impact on listed buildings;
- the impact on Conservation Areas;
- design and residential amenity;
- parking; and
- waste disposal.

Principle of development

37. The Framework requires local planning authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

38. At the heart of the Framework is the Government's objective of significantly boosting the supply of homes. Chapter 5 sets out that delivering a sufficient and wide choice of high quality homes is of the upmost importance, noting that Local Plans should meet the objectively assessed need for housing in their area. Paragraph 60 is the key consideration as it sets out an intention to boost significantly the supply of housing.

39. Paragraph 69 of the Framework identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The proposed development of four apartments will help to meet the Government's overriding objectives, and is on a site that paragraph 69 confirms as being suitable in principle.

40. Chapter 11 of the Framework includes the requirement that local planning authorities should proactively drive and support sustainable development to deliver the homes the country needs in a way that makes as much use as possible of previously-developed or 'brownfield' land. The site is classified as being previously-developed brownfield land, meeting this objective. The proposed development is consistent with the thrust of these guidelines, representing a pragmatic approach to housing delivery in an area where demand is demonstrable.

41. Paragraph 120 of the Framework outlines a number of points where planning should support the increase in use and density of sites. Point D is of importance, which states that planning should *"**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 (for example **converting space above shops** […]).'* (emphasis added). This site clearly meets the Government's definition of previously developed land and therefore its development meets a core national planning requirement.

42. Policy H1 of the Council's Local Plan set outs that provision will be made for at least an additional 15,847 homes in Reading Borough for the period 2013 to 2036, at an average of 689 homes per annum. The proposed development will contribute a total of four new dwellings to the supply of homes in the Borough.

43. Policy H8 of the Local Plan recognises that residential conversions have an important role to play in housing land supply in Reading. Policy H8 states that proposals to convert properties into self-contained flats will be supported provided that the proposal is of an appropriate design so to not have unacceptable adverse impacts on the amenity of future residents and those of neighbouring properties, and on the character of the wider area. The potential impact of the proposed development is assessed more fully below.

44. The site is located within the 'Central Core' and 'Office Core' as identified by the Local Plan. Policy CR6 sets out the criteria against which proposals for new residential development in these areas will be assessed. They are (our comments in *italics):*

- i) all proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable - *the proposed development will contribute a mix of 1 and 2 bedroom flats. The range of units is acceptable given the modest number of units proposed and the constraints of the existing building*;
- ii) proposals for new residential development within the central area will be required to demonstrate how the issue of potential noise disturbance from neighbouring land

uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated - *the development site is not located next to existing town centre uses that produce unacceptable levels of noise and / or disturbance. The potential for noise disturbance and air quality implications has been considered with no further mitigation required*;

- iii) in meeting the requirement to provide affordable housing, in the central area an over-concentration of social renting for single persons will be avoided - *the proposal does not meet the threshold required to provide affordable housing. No affordable units are proposed*; and
- iv) where proposals for serviced apartments and apart-hotels fall outside the C3 use class, they will be located within the Central Core. Such proposals will not be permitted unless the duration of occupation of residents is restricted, to ensure the units are used on a short stay basis and not as residential flats, and information monitoring the implementation of this restriction is regularly supplied - *the proposal will be for self-contained apartments for residential use (Use Class C3) only.*

45. Supporting text relating to Policy CR6 recognises the importance of Reading town centre as a location for new residential uses where it is anticipated a further 7,600 new homes will be delivered within the Plan period. This development will make a vital contribution of four additional dwellings with a mix of unit sizes to the supply of housing to the town centre.

46. Policy H3 'Affordable Housing' cites that new residential development will make appropriate contribution towards affordable housing to meet the needs of Reading. On sites of 1-4 dwellings, the Council require a financial contribution equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough. Policy H3 also states that where proposals fall short of the policy target as a result of viability considerations, the onus will be on the developer or landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.

47. The Council's Affordable Housing Supplementary Planning Document outlines the most appropriate way to calculate the affordable hosing contribution for particular scales of development. For sites of 1-4 dwellings, where the contribution is 10%, this will equate to 5% of Gross Development Value (GDV) of the development.

48. A Financial Viability Assessment has been prepared on behalf of the landowner for the proposed development to consider the level of affordable housing that would viable to provide. The assessment concludes that there will be a viability deficit in excess of £285,00, such that it is not financially viable to provide a Payment in Lieu of on-site affordable housing equating to 5% of residential GDV and maintain a reasonable level of return for the landowner. Therefore the proposal makes no contribution of affordable housing, in accordance with Policy H3.

49. The proposal evidently satisfies all of the criteria required for new residential developments in Central Reading. The proposal is therefore wholly consistent with the development plan in terms of the principle of new residential development in this location. The proposed development will make a material contribution to the objectives of increasing supply and widening the range of dwellings currently available in the town centre as much as the Borough as a whole.

50. The principle of converting the upper floors to C3 residential use therefore aligns with the broad objectives of Policies H1, H3, H8 and CR6 of the Local Plan, and the higher objectives of the Framework.

The loss of storage uses

51. The Framework places a requirement on local planning authorities to ensure the vitality of town centres. Chapter 7 encourages planning decisions that take a positive approach to the growth, management and adoption of town centres.

52. Paragraph 86 outlines the approaches that should be taken to support the growth of and continue to improve existing town centres. Point F of Paragraph 86 states that planning policies should '*recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.*'. The proposed development would make a positive contribution to ensuring the adaptability and vitality of Reading town centre.

53. The application site is located in the centre of Reading and is within the boundaries of the 'Central Core' and 'Office Core' areas, as defined by Policy CR1 of the Local Plan. The boundaries of the town centre are identified for the purposes of applying the sequential test set out in Paragraph 87 of the Framework. Paragraph 87 states that '*Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.*'.

54. The proposed development seeks to convert the existing floors above ground level into residential dwellings (Use Class C3). These floors have been vacant from their former office use for approximately 10 years, and have been in use for storage for the last 7 years. The upper floors of the building do not meet the demands required from a modern business environment. The floors are comprised of small rooms across multiple floors with stepped access throughout (as is characteristic of a private house). As such, the upper floors are more well suited to residential uses.

55. Policy CR6 of the Plan is supportive of proposals for new residential development in central Reading. The proposed development would contribute a mix of dwellings to meet the anticipated housing need by introducing a town centre use back to this town centre location.

56. Given the impracticalities of the site to accommodate commercial or business uses, there should be no 'in principle' objection to the conversion of the site from storage use to residential flats.

The impact on listed buildings

57. The importance of considering the impact of development on the significance of designated heritage assets is expressed in Section 16 of the Framework. The Framework states that whilst developments and alterations to designated assets and their settings can cause harm, proposals which preserve those elements of the setting that make a positive contribution to or better reveal the significance should be treated favourably.

58. Section 16(2) of the Planning (Listed Buildings and Conservations Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

59. Policy EN1 of the Local Plan relates to the protection and enhancement of the historic environment and states that the historic features, areas of historic importance and other elements of the historic environment will be protected and where possible enhanced.

60. The site is a Grade II listed building and it is listed for its group value with No. 12 Castle Street. The list description states '2. *Circa 1800. 3 storeys and attic. Red brick with brick flat arches and 1st floor cill band No10 retains dentil brick cornice. Parapet to both. Slight mansard to slate roof. Glazing bar sash windows in 3 ranges (including dormers). Outer 1st and 2nd floor windows tripartite. 2 modern shop fronts on ground floor and central round headed doorway with radiating and wreathed fanlight and 6 panel door approached by 3 steps. No 12 entered from side.*'

61. The property is listed for its group value and architectural features of the principle elevation. The proposal does not encompass any changes to the original principal elevation fronting Castle Street.

62. It is noted that the importance and detail of the internal features and the rear elevation are not mentioned in the listing.

63. The rear elevation of the site will be changed through the reduction of the single storey rear extension to create a new private outdoor amenity space. This is not considered detrimental to the building as this is a later addition with no historical significance. The development will result in the addition of two french doors leading from proposed ground floor apartment. The existing roof height will be not be altered. A new external wall (measuring 3.8 meters in height) is to be erected from the external boundary of the site to create a courtyard garden. This will not detract from the character of the listed building or negatively impact on the setting of the listed building.

64. Internally, the proposed development does not result in the loss of the properties significant historic fabric. The hallway serving the proposed flats will be widened to create an area of

secure storage for bicycles. The internal layout will also be altered to ease the use of the building and enhance its potential.

65. The proposal will preserve the significant historical features of the site as well as enhancing the character and the appearance of the listed building in accordance with Policy EN1 and Section 16 of the Framework.

The impact on Conservation Areas

66. Paragraph 206 of Section 16 of the Framework cites that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. The Framework specifically states that '*Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*.'.

67. Policy EN3 of the Local Plan relates to the enhancement of Conservation Areas. This policy acknowledges that positive consideration will be given to proposals which take opportunities to enhance the character of Conservation Areas. The policy states that 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.

68. Policy EN1 also encourages the protection and enhancement of the historic environment in Reading, including Conservation Areas. This policy supports proposals that enhance the significance of heritage assets and their settings, and the historic character and local distinctiveness of the area in which they are located.

69. The St Mary's Butts / Castle Street Conservation Area Appraisal provides a record of features of special architectural and historic interest within the St Mary's Butts / Castle Street Conservation Area. This Conservation Area is centred on the Grade I Listed Reading Minster, and specifically within Character Area 1 - The Gun Street and Castle Street frontages.

70. Whilst the application site is located in close proximity to listed buildings identified as positive contributors to the Conservation Area, 10 Castle Street is not specifically identified for its positive contribution to the historic character and importance of the conservation area. Limited weight should therefore be given to the potential impact of the proposed development on the St Mary's Butts / Castle Street Conservation Area.

71. The proposal does not encompass any changes to the original principal elevation fronting Castle Street. To the rear, the existing single storey extension will be reduced in size. The exiting extension is of no historical significance and, in fact, detracts from the listed status of the listed property, and so its loss should not be considered harmful to the Conservation Area. The new private courtyard will not be visible from any views into the Conservation Area and only from the upper floors of adjacent properties. This addition will significantly

improve the architectural quality of the site, both externally and internally, to have a positive impact on the Conservation Area.

72. A large proportion of the proposed development will only effect the interior of the property through the change of use and minor internal alterations.

73. The proposed alterations will enhance the potential use of the building and positively contribute to the character and appearance of this part of the Conservation Area in line with Policies EN1 and EN3 of the Local Plan, and Section 16 of the Framework.

Design and residential amenity

74. The Framework encourages all new development be of a suitably high quality. Paragraph 130 of the Framework states that planning decisions should ensure that developments create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.

75. Policy H5 sets out the standard to which all new build housing should be built. In particular, new housing should adhere to nationally described space standards These standards require the floor area of a double (or twin) bedroom to be at least 11.5 sq m, and a single bedroom to be at least 7.5 sq m. All proposed units exceed these standards.

76. Policy H8 relates to residential conversions and sets out the necessary requirements for proposals to convert properties into self-contained flats. These proposals will be supported where (our comments in *italics*):

- the proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features - *the proposal will make no changes to the principle elevation fronting Castle Street. The rear existing single storey extension will be reduced in size to create a private courtyard garden. Two new french doors of muted colour are proposed to serve the new ground floor flat. A large proportion of the proposed development will effect only the interior of the property*;
- the proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing - *the existing use of the site is as a shop and restaurant at ground floor and basement level and storage on the upper floors*;
- there are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties - *the proposal will comply with all relevant Building Regulations and will not result in an unacceptable increase in noise or disturbance to future residents or surrounding properties. Further mitigation measures can be agreed through a condition if required. See paragraphs 78-85 below for more information*;

- there is no inappropriate stacking and location of rooms between units - *see paragraphs 77-84 below for more information*;
- 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 - se*parate bin storage of an appropriate size to support four new apartments is provided off of the stairwell serving the apartments between the ground and first floors. Cycle storage for two bicycles is located at ground floor level*; and
- the resulting property or properties would provide adequate internal floorspace and headroom for residents - *the proposed dwellings all comply with and exceed minimum space standards for their respective number of bedrooms, and all have minimum floor to ceiling height of 2.3 meters for at least 75 percent of the Gross Internal Area.*

77. The Council's Residential Conversions Supplementary Planning Document (2013) specifically relates to conversions. The SPD stipulates that in order for properties to be suitable for conversion to flats they should be a minimum of 120 sq m or have a minimum of 4 bedrooms. In this instance, the existing property has a floor area in excess of 120 sq m and is therefore capable of being converted.

78. With regards to location of rooms between units, Policy H8 requires that proposals for residential conversions into self-contained flats should stack similar uses above one another.

79. In its response to a similar scheme submitted at the pre-application stage (LPA ref 210415/PREAPP), the Council advised that the proposed stacking of rooms was not the most amenity friendly, and that the kitchens / living rooms and bedrooms should be aligned vertically throughout to reduce the potential impact for noise and disturbance. However, arranging the internal rooms so that all bedrooms are stacked above one another would, in fact, require the erection of more partition walls, increasing the potential for harm to be caused to the Grade II listed building.

80. There are instances in other local authority areas where residential conversions into self-contained flats have been refused due to the stacking of dwellings, only for the decision to later be overturned or considered at appeal.

81. An appeal made against the London Borough of Hounslow (ref: APP/F5540/W/19/3228337) related to the conversion of a property into six self-contained flats. The local planning authority cited the stacking of living accommodation of one flat above the bedroom of another as a reason for refusal, and yet the Inspector concluded that '*this may result in a certain level of noise and disturbance due to activities at different times and by different age groups. Nonetheless, I have not been provided with any compelling evidence to dispute that this is primarily a sound insulation matter and that compliance with Building Regulations would be sufficient to mitigate any noise transmission and avoid unacceptable harm'*, and that '*the scheme would be acceptable in respect of its effect on the character and appearance of the area, living conditions and the suitability of the building for conversion.*'.

82. Another appeal was made against an enforcement notice issued by the London Borough of Brent (ref: APP/T5150/C/19/3235516). The local planning authority raised an issue with the impact of the development on the living conditions of adjoining and nearby residents where a kitchen / living area of one flat was located above the bedroom of another. The Inspector considered that, '*In this case the kitchen is small which would limit the amount of noise which would be generated by its use and it forms part of an open-plan living space the majority of which sits above the living areas in the lower flat. On this basis I am not persuaded that the internal arrangements provide unacceptable living conditions for residents*', and concluding that '*the development provides acceptable living conditions for occupants with regard to internal arrangements*'.

83. Furthermore, in appeal against the London Borough of Harrow (APP/M5450/W/20/3259249) for the redevelopment of a property to provide nine flats, the Inspector considered the proposed stacking arrangements of several flats, whereby living spaces / kitchens were located above bedrooms and vice versa, '*whilst not ideal could be adequately addressed through sound insulation*.'.

84. The proposed scheme includes three self-contained apartments above one another. Flats A and B are stacked vertically but Flat B and C are not. The living room / kitchen of flat B is located above the bedrooms of flat C. As per the above appeals, the kitchen of flat B is small and forms part of an open-plan living space, and so it is not considered that the living room / kitchen use of flat B will result in an unacceptable level of noise or disturbance to each of the bedrooms of flat A.

85. The development will comply with all relevant Building Regulations which will be sufficient to mitigate any noise or disturbance causing unacceptable harm to the future residents of flat C. Should noise still be considered a problem, the generous floor to ceiling heights of the existing building would allow for a suspended ceiling and soundproofing to be installed. This specific requirement could be covered by a suitably worded condition.

86. Local Plan Policy CC2 relates to sustainable design and construction and sets out that all non-residential conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum.

87. A BREEAM Report has been prepared for the proposed development which confirms that the overall score of the scheme will be equivalent to an overall BREEAM rating of 'Very Good'. The proposal therefore complies with the standards set out in Policy CC2.

Future occupiers

88. Policy CC8 of the Local Plan relates to safeguarding amenity to for future residents and existing residential properties. The policy seeks to ensure that new development does not cause harm to the living conditions of future residents, in terms of loss of privacy and overlooking, access to daylight and sunlight, visual dominance, and noise and disturbance amongst other things.

89. The property does not face onto any windows associated with residential uses, and the internal arrangements of the proposed dwellings have been designed so to be free from overlooking or visual dominance from neighbouring properties. In terms of outlook and daylighting, apartments A, B and C will front onto Castle Street and will be well served in this respect. Flat D would be served by a roof light to the rear of the building which would provide sufficient lighting to the living room / kitchen. The rear of flat D is also served by an external amenity area. Amenity space is not proposed for the remaining units. This is due to the fact that the proposed housing mix is less likely to attract families, and the ability to walk to public open space nearby would omit the need for private open space.

90. The proposal will also not result in an unacceptable level of noise or disturbance to future residents. The proposed dwellings will not be located next to existing town centre uses that would give rise to unacceptable levels of noise. A Noise Impact Assessment Report has been prepared for the proposed development and is submitted as part of this application. This considers the suitability of the site for residential development, in accordance with the provisions of the Framework and the Noise Policy Statement for England, and concludes that,

91. The report concludes that, subject to glazing performance of existing units meeting the required specifications, all residential environments of the dwelling will be provided satisfactory internal noise levels and no further mitigation measures should be required in order to protect the proposed habitable spaces from external noise intrusion.

Neighbouring Amenity

92. Policies CC8 considers the impact of new development on the amenity of existing residential properties. Consideration is made to the impact of proposals with regards to, for example, privacy and overlooking, access to daylight and sunlight, harm to outlook, and noise and disturbance.

93. Policy H8 also requires that residential conversions do not have unacceptable adverse impacts to the residents of surrounding properties arising from noise and disturbance.

94. With regard to neighbouring amenity, the property does not face onto any windows associated with residential uses. Due to the orientation and relationship of the proposed dwellings to neighbouring uses, it is not considered that there will be any harm.

95. The proposal encompasses the partial demolition of the existing single storey infill extension. As such the proposal would not lead to any loss of daylight sunlight or outlook to the neighbouring properties, but would rather result in an improvement relative to the existing situation .

96. At present the restaurant use operates between 09:00 and 21:00 (Monday - Saturday). It is considered that the proposed takeaway / restaurant use within the ground and basement of the building will operate at similar times and so will not cause any additional harm to neighbouring occupier's amenity.

97. The proposal will also not result in an unacceptable level of noise or disturbance to neighbouring properties from either the proposed takeaway / restaurant or dwellings.

98. The proposed scheme has been designed to the highest standard so to provide a suitable and attractive range of new dwellings. This design adequately addresses the amenity of future occupants and existing neighbours, and is wholly in accordance with with the requirements of the Council's Residential Conversion SPD, Policies CC8, H5 and H8 of the Local Plan, and the objectives of the Framework.

Parking

99. The Framework continues to recognise that transport policies have an important role to play in facilitating sustainable development and states that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 111 of the Framework states that developments should not be refused on transport grounds unless there would an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

100. Paragraph 106 of the Framework states that local planning authorities should take into account a range of factors if they choose to set local parking standards for residential and non-residential development. These factors are the accessibility of the development; the type, mix and use of development; the availability of opportunities for public transport; local car ownership levels; and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

101. Paragraph 110 sets out that applications for development should ensure that '*appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location*'. The site is located within Zone 1 of the adopted Parking Standards and Design SPD which is an area consisting primarily of retail and commercial developments. The area is well served by local retail, bus and rail links, and also contains the largest proportion of public car parking spaces.

102. Due to the sustainable location of the site, in close proximity to facilities to meet the day-to-day needs of the occupants and alternatives to the private car such as the bus or walking and cycling routes, the proposal is considered to be acceptable as a car free development, which would further help reduce the reliance on the private car.

103. In accordance with the adopted Parking Standards and Design SPD, the proposed flats would require two cycle spaces. Two cycle spaces are proposed at ground floor level.

104. The proposed parking arrangements comply wholly with the Council's standards, as well as meeting the objectives of the Framework.

Waste disposal

105. The refuse collection arrangements that exist currently would remain - requiring tenants to place their refuse collection on the street at the day of collection. Whilst the flat sizes are in excess of the minimum space requirements set out in the Technical Space standards, in order to cater for an increased area for the storage of waste, there is also an additional communal bin storage area at first floor which would serve all 4 flats.

106. Refuse from the mixed use restaurant / takeaway proposed at ground floor and basement level would be stored internally before being collected by private arrangement on a weekly basis.

F. HERITAGE STATEMENT

Design and impact on the character and appearance of the St Mary's Butts / Castle Street Conservation Area and listed buildings

Policy background

107. Section 12 of the Framework relates to design and states that the Government attaches great importance to the design of the built environment, with good design a key aspect of sustainable development. Paragraph 134 states that great weight should be given to outstanding or innovative designs that promote high levels of sustainability, or help to raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of the sites surroundings.

108. Section 16 of the Framework relates to the conservation and enhancement of the historic environment. The Framework states that whilst developments and alterations to designated assets and their settings can cause harm, proposals which preserve those elements of the setting that make a positive contribution to or better reveal the significance should be treated favourably.

109. Paragraphs 199 to 202 outline that, when considering the impact of a proposed development on the significance of a designated heritage asset, local planning authorities should place great on the asset's conservation, and that any harm should require clear and convincing justification. Paragraph 202 states 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.*'.

110. Paragraph 206 of the Framework cites that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. The Framework specifically states that '*Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*'.

111. Section 16(2) of the Planning (Listed Buildings and Conservations Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

112. Policy H5 of the Local Plan sets out that development should be of a high standard of design. Policy H8 relates to residential conversions and requires proposals for self-contained flats to respect the physical character of the area in terms of scale, location, materials and design.

113. Policy EN1 relates to heritage assets and supports proposals that enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area

in which they are located. This reflects the Framework and the law that proposals must preserve such assets in a manner appropriate to their significance, and enhance them but only where appropriate.

114. Policy EN3 relates to the enhancement of Conservation Areas and acknowledges that positive consideration will be given to proposals which take opportunities to enhance the character of Conservation Areas. The policy cites that 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.

115. The St Mary's Butts / Castle Street Conservation Area Appraisal provides a record of features of special architectural and historic interest within the St Mary's Butts / Castle Street Conservation Area. Character Area 1 of the Appraisal relates to frontages of Gun Street and Castle Street.

Assessment

116. The site is a Grade II listed building and it is listed for its group value with No. 12 Castle Street. The list description states '2. *Circa 1800. 3 storeys and attic. Red brick with brick flat arches and 1st floor cill band No10 retains dentil brick cornice. Parapet to both. Slight mansard to slate roof. Glazing bar sash windows in 3 ranges (including dormers). Outer 1st and 2nd floor windows tripartite. 2 modern shop fronts on ground floor and central round headed doorway with radiating and wreathed fanlight and 6 panel door approached by 3 steps. No 12 entered from side.*' It is noted that the importance and detail of the internal features and the rear elevation are not mentioned in the listing.

117. The site also lies within the St Mary's Butts / Castle Street Conservation Area. Whilst the application is located in close proximity to listed buildings identified as positive contributors to the Conservation Area, 10 Castle Street is not specifically identified for its positive contribution to the historic character and importance of the Conservation Area. Limited weight should therefor be made to the potential impact of the proposed development on the Conservation Area.

118. The property is listed for its group value and architectural features of the principle elevation. The proposal does not encompass any changes to the original principal elevation fronting Castle Street.

119. The Council's pre-application response advised that the restaurant itself, Sweeney and Todd, should be considered as a main feature of Castle Street, and thus the Conservation Area, and that information related to the historical significance of the restaurant should be included in any future application.

120. We recognise that Sweeney and Todd does contribute to the character of Castle Street, however the proposed change of use will not will not prevent Sweeney and Todd from

operating as a business on the site, rather the business will be diversified, and so there will be no loss of the historically significant use.

121. To the rear, the existing single storey extension will be reduced in size to create a new private outdoor amenity space. The proposed changes will result in the addition of two french doors leading from the ground floor apartment. The existing roof height will be not be altered. All materials used will match those of the existing building. The proposed change is not considered detrimental to the building or the Conservation Area as this is a later addition with no historical significance. In fact, the existing building detracts from the listed status of the property, and so its loss should not be considered harmful to this status or the Conservation Area. The Council's pre-application response also stated that the proposed demolition of the rear extension was considered acceptable, as this extension was not an original feature of the building.

122. A new external wall (measuring 3.8 meters in height) is to be erected from the external boundary of the site to create a courtyard garden. This will not detract from the character of the listed building or negatively impact on it's wider setting. The new private courtyard will not be visible from any views into the Conservation Area and only from the upper floors of adjacent properties. This addition will significantly improve the architectural quality of the site, both externally and internally, to have a positive impact on the Conservation Area.

123. Internally, the proposed development does not result in the loss of the properties significant historic fabric. The internal layout will be altered to ease the use of the building and enhance its potential.

124. The scheme has been designed with due consideration for the protection and enhancement of the properties heritage and the wider Conservation Area, as much as to ensure the development does not result in unacceptable impacts to the amenity of future residents and existing neighbouring residents.

125. The proposal will preserve the significant historical features of the site as well as enhancing the character and the appearance of the listed building in accordance with Policies EN1 and EN3 of the Local Plan, and Section 16 of the Framework.

126. Therefore it is the applicant's view that no harm will result from the proposed development with respect to designated heritage assets, and accordingly paragraphs 199-202 of the Framework are not engaged. Consequently, the relevant development plan polices in relation to design and heritage will be wholly complied with.

127. Should the Council consider that the proposed development would result in less than substantial harm to the significance of a designated heritage asset (as per paragraph 202 of the Framework), then this will be outweighed by the public benefits afforded by the scheme by securing its optimum viable use and providing four additional homes in the centre of Reading.