

Planning Statement

Proposal:

Proposed conversion, alteration and extension of existing former commercial building (Use Class E) to 6 no flats (Use Class C3) with associated works and operations

Site:

Russell Hall, land to the rear of 117–119 Oxford Road, Reading, RG1 7UH

Prepared for:

Hazeley Ltd

Date:

June 2026

1 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Hazeley Ltd in support of a full detailed planning application relating to the conversion, alteration and extension (and associated operations and landscaping works) of an existing building, Russell Hall, on land to the rear of 117–119 Oxford Road, Reading to form 6 no. flats.
- 1.2 Reading Borough Council (the “**Council**”) is the Local Planning Authority (the “**LPA**”) for the purposes of the Town and Country Planning Act 1990 (as amended) for the area in which the application site is situated.
- 1.3 The application relates to the rear part of 117–119 Oxford Road, Reading, known as Russell Hall, which is accessed from Zinzan Street. The frontage building, Russell House, is retained in its existing commercial use and does not form part of the physical works, although the heritage and townscape context of the entire site has been assessed comprehensively.
- 1.4 The proposals are heritage-led and informed by a suite of technical assessments. The Heritage Impact Assessment prepared by Pont + Wils Architects (April 2026) explains that the development comprises the retention and sensitive adaptation of Russell Hall, including an upward extension achieved by raising the eaves, gable ends and ridge by approximately 1.5 metres.
- 1.5 The scheme retains the existing building in full and seeks to enhance its long-term viability through residential conversion.
- 1.6 The Air Quality Assessment prepared by Greenavon Ltd (April 2026) confirms that the site lies within the Reading Town Centre Air Quality Management Area and that background and monitored concentrations are below relevant objectives.
- 1.7 The Noise Impact Assessment prepared by DAA Group (April 2026) assesses the conversion of the existing commercial space and construction of six residential units, finding a low ProPG noise risk and demonstrating that internal standards can be met with appropriate façade design.
- 1.8 The Preliminary Roost Assessment prepared by Sam Watson Ecology (December 2025) confirms that no evidence of bats or bat roosts was identified and that the building is unlikely to support roosting bats at present.
- 1.9 A full set of architectural drawings (Nick Turner Architect) accompany the application.
- 1.10 The submitted supporting documents are intended to form the basis of any planning permission, with conditions focused on implementation and key details rather than extensive post-decision submissions.
- 1.11 This Statement describes the site and its context, explains the proposed development, sets out the relevant planning policy framework, provides a detailed planning assessment including heritage, design, amenity, air quality, noise, ecology, transport and sustainability considerations, and draws together the overall planning balance and conclusion.

- 1.12 It outlines the proposal's alignment with both national and local policy frameworks, explains how the scheme integrates into the built and natural environment and sets out in detail why the application is eminently supportable.

2 Site Location and Context

- 2.1 The application site comprises the rear hall building known as Russell Hall, associated hardstanding and access from Zinzan Street, forming part of 117–119 Oxford Road (Russell House to the frontage).
- 2.2 Russell Hall is a part-one, part-two storey 1920s hall building with an undercroft parking area at ground floor and a large volume hall above. It is largely hidden from public view, being visible only from the rear access on Zinzan Street and through narrow gaps between buildings on Waylen Street and Oxford Road. As the Heritage Impact Assessment notes:

“The hall is largely hidden from public view, being visible only from the rear access on Zinzan Street and via very narrow glimpses through a small gap between buildings on Waylen Road...These restricted viewpoints mean Russell Hall and The Hill are largely experienced in private or semi-private contexts, with minimal presence within the public streetscape.” (paras. 3.2 & 3.7)

- 2.3 The building has historically been used for Use Class E purposes (most recently as a dance studio). The Heritage Impact Assessment records that “earlier records indicate a long-standing leisure use potentially dating back several decades, likely consistent with its original construction in the 1920s” (para. 2.7.2).

Surrounding area

- 2.4 The site lies within a dense urban area close to Reading town centre. The Oxford Road corridor is characterised by two- and three-storey terraces and mixed-use buildings; a strong, continuous street frontage with active ground floor uses; and a fine urban grain with rear yards, mews and ancillary buildings.
- 2.5 The Conservation Area Appraisal, quoted in the Heritage Impact Assessment, notes that:

“The wider Conservation Area is valued for its historic and architectural significance, comprising predominantly two- and three-storey buildings including Georgian terraces, detached villas, Victorian shops, and community buildings...The Oxford Road Character Area forms a linear corridor along Oxford Road, historically connecting Reading town centre to Pangbourne and onward to Oxford.” (paras. 4.1.2–4.1.3)

- 2.6 The site directly adjoins Phoenix Place and 123 Oxford Road, both identified in the Conservation Area Appraisal as “sites or buildings of opportunity for improvement” (para. 4.4.2). The proposal therefore sits within an area where sensitive enhancement and betterment are explicitly encouraged.
- 2.7 The site lies within the Russell Street / Castle Hill / Oxford Road Conservation Area, specifically the Oxford Road Character Area. There are no listed buildings on or immediately adjoining the site. Nearby listed buildings, including Holy Trinity Church and 101 and 104 Oxford Road, are located on the north side of Oxford Road and are visually separated from the site by Russell House and intervening development. The Heritage Impact Assessment concludes that this separation

ensures the proposals will not result in direct harm to the setting of these listed structures.

- 2.8 The site lies within the Reading Town Centre Air Quality Management Area, declared for exceedances of the annual mean NO₂ objective. The Air Quality Assessment confirms this designation and notes that the proposed development is located within the AQMA.
- 2.9 The site is previously developed land within the central urban area and is within Flood Zone 1.
- 2.10 Ecologically, the site is fully urban and built-up, with the Preliminary Roost Assessment confirming no evidence of bat roosts and concluding that the building is unlikely to support roosting bats.
- 2.11 Its location within the defined town urban area, combined with the absence of environmental constraints, reinforces the application site's suitability for context-responsive residential development.

3 Planning History

- 3.1 The planning history of the wider site at 117–119 Oxford Road provides important context for the current proposal. While Russell Hall itself has not been the subject of significant recent applications, the frontage building (Russell House) and the wider plot have a long and varied planning history reflecting the mixed-use character of the Oxford Road corridor.
- 3.2 Historic records indicate that the frontage building has accommodated a range of commercial uses over several decades, including retail, office and leisure/recreational activities. The hall to the rear appears to have been constructed in the early twentieth century and historically operated as a commercial use or leisure facility, most recently as a dance studio.

Pre-Application Enquiry

- 3.3 The most relevant recent planning engagement is the 2021 pre-application enquiry (Ref. 201281), which related to a proposal for the demolition of Russell Hall and the construction of nine one-bedroom flats. The Council's response raised several concerns, including the loss of community use, the demolition of a non-designated heritage asset, the scale and massing of the proposed new-build structure, and the potential for overlooking and amenity impacts. That pre-application response has been instrumental in shaping the current proposal, which has been fundamentally redesigned to address each of the issues raised.
- 3.4 There is no planning history that would constrain the retention, alteration or conversion of Russell Hall. The absence of any recent permissions affecting the hall itself reinforces the need for a viable long-term use to secure its future. The current proposal represents the first comprehensive attempt to do so in a manner that respects the building's heritage value, responds to the site's constraints, and aligns with the Council's policy framework.
- 3.5 The Council's pre-application response of 1 February 2021 provided a clear set of concerns regarding the earlier proposal for demolition and redevelopment. The current scheme has been comprehensively redesigned to respond to each of those concerns in a positive and constructive manner.
- 3.6 The Council's principal objection related to the loss of community use under Policy OU1. At the time, the proposal involved complete demolition of the hall and redevelopment for residential use. The Council advised that robust evidence would be required to demonstrate that the community use was no longer viable or needed. The Council's reference to the Hall being a community facility is not correct. It is important to note that Hall is not, and has never in living memory, been available as a community facility. It is clear that the Hall is Use Class E and not Use Class F. Therefore justification for the loss of a community facility in policy terms is not required. Furthermore, given the current condition of the building, it is functionally obsolete in its current form, and there is no alternative interest in its reuse. The proposal therefore satisfies the requirements of Policy OU1, even though it needn't have to.
- 3.7 A second major concern related to the demolition of a non-designated heritage asset. The Council emphasised that Russell Hall contributes to the historic evolution of the Conservation Area and that its demolition would be harmful. The current proposal responds decisively by retaining the building style in full, preserving its contribution to the Conservation Area and avoiding the heritage harm

previously identified. The Heritage Impact Assessment confirms that the proposed alterations, including the upward extension, will preserve the character and appearance of the Conservation Area.

- 3.8 The Council also raised concerns regarding the scale, massing and design of the previous new-build proposal, which was considered excessive and out of keeping with the surrounding townscape. The current scheme adopts a heritage-led design approach, involving only a modest upward extension of 1.5 metres, with the existing gabled form retained. This represents a significant reduction in scale and visual impact compared with the earlier proposal.
- 3.9 The pre-application response highlighted potential overlooking and amenity impacts, particularly from balconies facing neighbouring properties. The current proposal has been carefully designed to avoid such impacts. Window placement has been controlled to prevent overlooking, and privacy screens have been incorporated where necessary. The design ensures that both existing and future residents benefit from appropriate levels of privacy and amenity.
- 3.10 The Council also advised that air quality, noise and ecology assessments would be required to support any future application. These have now been completed and demonstrate that the development is acceptable in environmental terms. The Air Quality Assessment confirms that pollutant concentrations are below relevant objectives and that future residents will not be exposed to unacceptable levels of pollution. The Noise Impact Assessment demonstrates that internal noise standards can be achieved with modest façade specifications. The Preliminary Roost Assessment confirms that the building is unlikely to support roosting bats.
- 3.11 Finally, the Council requested clarity on parking, access, refuse and cycle storage. The current proposal provides a clear and policy-compliant arrangement, with cycle storage and refuse facilities located conveniently near the access point and a modest level of parking appropriate to the site's highly sustainable location.
- 3.12 In summary, the current proposal represents a comprehensive and positive response to the Council's pre-application advice. Every concern raised has been addressed through a combination of design changes, technical evidence and a fundamentally different approach to the building's future. The scheme now before the Council is materially different from the earlier proposal and is aligned with both local and national planning policy.

4 The Proposed Development

- 4.1 This application seeks full planning permission for the retention and conversion of the existing Russell Hall building, together with an upward extension achieved by raising the eaves, gable ends and ridge by approximately 1.5 metres.
- 4.2 The roof form is reconfigured to accommodate additional accommodation, with new dormers, rooflights and carefully placed openings introduced to ensure appropriate daylighting and outlook. The building is converted from Use Class E to Use Class C3 to provide six self-contained apartments arranged over ground, first and second floors.
- 4.3 The existing undercroft parking and access from Zinzan Street are retained and rationalised.
- 4.4 Private balconies and terraces are provided for upper floor units, with shared amenity space at ground level.
- 4.5 Associated refuse and recycling storage, cycle storage and minor external works are included.

Layout and Access

- 4.6 The internal layout arranges flats across three levels. Ground floor units benefit from patios and direct access to shared external space, while upper floor units benefit from balconies with privacy screens. A central stair core provides vertical circulation. Vehicular and pedestrian access is taken from Zinzan Street using the existing rear access. Parking and manoeuvring areas are contained within the site, beneath and adjacent to the hall. Refuse and cycle storage are located conveniently near the access point.

Design Approach

- 4.7 The design approach is heritage-led and seeks to retain the existing hall volume and its simple gabled form. The height is subtly increased to create viable residential floorspace while respecting the surrounding scale. High-quality, contextual materials such as brick and slate or tiles are used to ensure the building sits comfortably within the Conservation Area. Unsympathetic later accretions are removed, and more coherent elevations are reinstated. The Heritage Impact Assessment emphasises that the scheme enhances the building's long-term viability through residential conversion while reinstating original materials where appropriate.

5 Planning Policy Context and Assessment

Statutory Framework

- 5.1 The legislative context for this application is set out in the Town and Country Planning Act 1990 (as amended) (the “**1990 Act**”) and the Planning and Compulsory Purchase Act 2004 (as amended) (the “**2004 Act**”).
- 5.2 Section 38(6) of the 2004 Act 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."*
- 5.3 Section 70(2) of the 1990 Act provides that in determining applications: *"[t]he authority shall have regard to the provisions of the development plan, so far as material to the application...and to any other material considerations."*
- 5.4 The Development Plan for the District comprises the policies of the Reading Borough Local Plan (adopted November 2019), which forms the primary basis for decision-making under Section 38(6) of the Planning and Compulsory Purchase Act 2004. A number of policies within the Local Plan are directly relevant to the proposed development, and together they establish a clear framework for assessing the acceptability of the scheme in terms of land use, design, heritage, amenity, environmental quality, transport and sustainability.
- 5.5 In accordance with Section 70(2) of the 1990 Act, the decision-maker must also have regard to any other material considerations, including the National Planning Policy Framework (December 2024) (the “**NPPF**”), which provides important national policy guidance.

National Planning Policy Framework

- 5.6 The NPPF is a material consideration in the assessment of this application.
- 5.7 Paragraph 2 of the NPPF reaffirms that the planning system is plan-led, meaning that planning decisions should be made in accordance with the relevant Development Plan unless material considerations indicate otherwise. This reflects the statutory duty under Section 38(6) of the 2004 Act, ensuring that local plans form the foundation of decision-making and that certainty and consistency are maintained in the development process.
- 5.8 Paragraph 7 of the NPPF sets out the overarching objective of the planning system, which is to contribute to the achievement of sustainable development. Paragraphs 8 – 10 of the NPPF further explain that this means positively guiding growth in a way that balances economic, social and environmental objectives. This principle underpins all subsequent policies in the NPPF and is directly relevant to proposals, such as this one, that bring forward well-designed, low-impact homes in sustainable town locations such as central Reading.
- 5.9 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development, which lies at the heart of the NPPF.

5.10 Section 12 of the NPPF highlights the importance of achieving “*well-designed places*” and makes it clear that: “*The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*” (see Paragraph 131 of the NPPF). The NPPF supports development that is visually attractive, locally responsive and contributes positively to its setting. In particular, Paragraph 135 of the NPPF encourages developments that:

- “*are visually attractive as a result of good architecture, layout and appropriate and effective landscaping*”; and
- “*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change*”; and

5.11 The proposals respond directly to the principles set out in Section 12 of the NPPF. As further detailed in the Heritage Statement and accompanying architectural drawings, the scheme has been carefully designed to be visually attractive, locally responsive and positively integrated into its setting. The designs reflect a high standard of architectural quality, a clear understanding of local character and a sensitive approach to integration, all of which align closely with the objectives of Paragraphs 131 and 135 of the NPPF.

5.12 The NPPF positively supports the delivery of high-quality, well-designed and sustainable dwellings. This application exemplifies those aims.

Reading Borough Local Plan

5.13 Policy CC1 sets the overarching expectation that development proposals which accord with the Local Plan should be approved without delay, and that where policies are out of date or silent, permission should be granted unless adverse impacts would significantly and demonstrably outweigh the benefits. The proposed conversion and upward extension of Russell Hall aligns with this presumption, making efficient use of previously developed land in a highly accessible location.

5.14 Policy CC2 requires development to demonstrate high standards of sustainability, including energy efficiency, water efficiency and climate resilience. The proposal inherently supports these aims by re-using an existing structure, thereby reducing embodied carbon, and by incorporating modern construction standards that will significantly improve the thermal performance of the building relative to its current condition.

5.15 Policy CC3 requires development to be resilient to climate impacts, including overheating, flood risk and extreme weather. The proposal meets these requirements through its location in Flood Zone 1, its compact form, and the opportunity to incorporate modern ventilation and overheating mitigation measures as part of the conversion.

5.16 Policy CC6 supports higher-density development in central locations where accessibility to services and public transport is high. The site lies within the Reading Central Area and is exceptionally well served by public transport, including frequent bus services along Oxford Road and proximity to Reading West station. The proposed six units represent an appropriate and efficient intensity of development for such a location.

5.17 Policy CC7 requires development to be of high design quality, respond positively to local character, and enhance the public realm. The proposal achieves this by

retaining the existing hall structure, removing unsympathetic later additions, and introducing a modest, well-proportioned upward extension that respects the scale, form and materials of the surrounding Conservation Area.

- 5.18 Policy CC8 requires development to protect the amenity of existing and future occupiers, including in relation to noise, privacy, daylight, sunlight and air quality. The accompanying Noise Impact Assessment and Air Quality Assessment demonstrate that acceptable internal environments can be achieved, while the design of the scheme—including careful placement of windows and the use of privacy screens—ensures that neighbouring amenity is safeguarded.
- 5.19 Policy EN1 and EN6 are central to the assessment of this proposal. These policies require development to preserve or enhance the character and appearance of Conservation Areas and to respect the significance of heritage assets. The Heritage Impact Assessment confirms that Russell Hall is a non-designated heritage asset of modest significance, largely hidden from public view, and that the proposed alterations—including the upward extension—will preserve the character and appearance of the Conservation Area. The retention and sensitive adaptation of the building represent a positive heritage outcome.
- 5.20 Policy EN15 requires development to avoid worsening air quality and to ensure that new sensitive uses within an Air Quality Management Area are appropriately mitigated. The Air Quality Assessment demonstrates that pollutant concentrations at the site are below relevant objectives and that future residents will not be exposed to unacceptable levels of pollution. The development therefore complies with Policy EN15.
- 5.21 Policy H1 supports the delivery of new homes across the Borough, including through the conversion of existing buildings. The proposal contributes positively to housing supply in a sustainable location, consistent with the aims of Policy H1.
- 5.22 Policy H2 encourages development to make efficient use of land and to provide an appropriate mix of dwelling types and sizes. While the proposal comprises six units (2 x 2 bed and 4 x 1 bed), this is justified by the physical constraints of the existing building, the central urban location, and the identified demand for smaller units within Reading's housing market. The scheme therefore represents an appropriate response to Policy H2 in this specific context.
- 5.23 Policy H5 requires new dwellings to meet nationally described space standards and to provide acceptable levels of daylight, sunlight, outlook and privacy. The proposed units meet or exceed the relevant space standards, and the design ensures that all habitable rooms benefit from appropriate natural light and outlook.
- 5.24 Policy H10 requires new residential development to provide adequate outdoor amenity space. The proposal achieves this through a combination of private patios and balconies, together with shared external space at ground level, representing a balanced and policy-compliant approach to amenity provision in a constrained urban setting.
- 5.25 Policy OU1 seeks to protect community uses unless it can be demonstrated that they are no longer needed or viable. In this case, Russell Hall, despite the earlier pre app commentary, is not in fact a community facility as it has operated as commercial enterprise. The building is functionally obsolete in its current form, and its retention and conversion to residential use represent the most viable and sustainable long-term solution. The proposal therefore satisfies the requirements of Policy OU1.

- 5.26 Policies TR1, TR3 and TR5 collectively require development to minimise traffic impacts, provide safe and appropriate access, and encourage sustainable travel. The site's highly accessible location supports a low-car or car-free approach, and the proposal includes appropriate cycle parking and refuse arrangements. The Transport Assessment confirms that the development will have a negligible impact on the local highway network.
- 5.27 Finally, Policy CR6 supports residential development within the Central Area, recognising the role of high-density, well-designed housing in supporting the vitality and sustainability of the town centre. The proposal aligns directly with this policy by delivering high-quality homes in a central, accessible and sustainable location.
- 5.28 The Russell Street / Castle Hill / Oxford Road Conservation Area Appraisal is a key local evidence document, identifying:
- The special interest of the area.
 - Positive and negative features.
 - Sites/buildings of opportunity for improvement (including Phoenix Place and 123 Oxford Road, immediately adjoining the site).
- 5.29 Taken together, the relevant Local Plan policies provide strong support for the proposed development. The scheme represents a sustainable, heritage-led reuse of an existing building, delivers much-needed housing, enhances the character of the Conservation Area, and addresses all technical and environmental considerations in a robust and policy-compliant manner.

6 Planning Merits and Material Considerations

- 6.1 This section sets out a comprehensive planning assessment of the proposal to convert the Russell Hall into 6 no flats. It evaluates the proposal against relevant planning policies, case law, site-specific considerations, and the suite of supporting technical documents. The assessment demonstrates that the development is policy-compliant and delivers tangible benefits through high-quality design, additional housing supply, heritage led development and enhanced sustainability.

Principle of Development

- 6.2 The proposal involves the re-use and adaptation of an existing building on previously developed land within Reading's central urban area. National and local policy strongly support making effective use of land, re-using existing buildings and delivering additional housing in accessible locations close to services, jobs and public transport.
- 6.3 The site is within easy walking distance of Oxford Road bus routes and Reading West station.
- 6.4 In this context, the loss of a commercial space is not considered harmful to community provision, particularly given the abundance of other community and religious facilities along Oxford Road. The conversion to residential use secures a viable long-term use for the building, consistent with NPPF objectives.
- 6.5 The Reading Local Plan supports residential development in central locations, including conversions, provided acceptable living conditions are achieved, neighbouring uses are not unacceptably affected, and the design responds appropriately to heritage considerations.
- 6.6 The Air Quality Assessment demonstrates that exposure will be acceptable with appropriate design and mitigation, and the Noise Impact Assessment confirms that internal noise standards can be achieved.
- 6.7 The principle of residential conversion and upward extension is therefore fully consistent with national and local policy.

Housing Matters

- 6.8 Housing delivery is a central objective of the Reading Borough Local Plan (2019), which seeks to ensure that new development contributes positively to meeting the Borough's identified housing needs in terms of both quantity and quality. The proposed conversion and upward extension of Russell Hall to provide six self-contained apartments represents a modest but meaningful contribution to Reading's housing supply, particularly within the context of the Reading Central Area where opportunities for new residential development are limited by the tightly constrained urban fabric.
- 6.9 Policy H2 (Density and Mix) requires new residential development to make efficient use of land and to provide an appropriate mix of dwelling types and sizes, having regard to the character of the area, the nature of the site, and the identified needs of the Borough. The policy recognises that smaller units, including one-bedroom apartments, play an important role in meeting the needs of single-person

households, young professionals, and those seeking more affordable market entry points within Reading's housing market.

- 6.10 The proposal comprises six units (2 x 2 bed and 4 x 1 bed). While this represents a smaller mix, it is a direct and proportionate response to the physical constraints of the existing building, the heritage context, and the structural limitations inherent in adapting a 1920s hall. The internal configuration of the existing structure, including the undercroft parking area, the retained gabled form, and the modest footprint, naturally lends itself to smaller units. Attempting to introduce larger units would compromise the building's structural integrity, reduce the efficient use of space, and potentially necessitate more intrusive alterations that would be harmful to the Conservation Area.
- 6.11 Furthermore, the site's location within the Reading Central Area strongly supports the delivery of smaller units. The Local Plan acknowledges that central urban locations are particularly suited to higher-density accommodation and smaller dwellings, reflecting the demographic profile of town centre residents and the proximity to employment, services and public transport. The proposal therefore aligns with the spatial strategy and the expectations of Policy H2.
- 6.12 It is also relevant that Reading's Strategic Housing Market Assessment identifies a sustained demand for smaller units, particularly one-bedroom apartments, driven by household formation trends and affordability pressures. The proposal responds directly to this need and contributes to a balanced housing stock across the Borough.
- 6.13 Policy H3 (Affordable Housing) requires developments of 5–9 dwellings to provide an off-site financial contribution towards affordable housing provision, unless specific exemptions apply. The policy sets out a sliding-scale approach, with smaller schemes expected to contribute proportionately to the Borough's affordable housing needs.
- 6.14 As the proposal comprises six units, it falls squarely within the threshold where a financial contribution in lieu of on-site provision is required. The precise contribution is normally determined through the Council's adopted formula, taking into account:
- the number of units proposed,
 - the tenure and size of those units,
 - the viability of the scheme, and
 - any abnormal costs associated with the development.
- 6.15 In this case, the proposal involves the retention and conversion of an existing building, which carries inherent structural, heritage and construction-related constraints. The need to retain the existing fabric, upgrade the thermal performance of the building, and sensitively integrate new accommodation within a heritage context all contribute to a development profile that is more complex and costly than a typical new-build scheme.
- 6.16 Policy H3 explicitly recognises that viability considerations may be relevant, particularly for constrained or conversion-based schemes. The Council typically assesses viability on a case-by-case basis, and where justified, may agree a reduced contribution. However, unless viability evidence demonstrates otherwise, a financial contribution will be required.

- 6.17 The Local Plan recognises that smaller, constrained or conversion-based schemes may not be capable of supporting affordable housing contributions without undermining deliverability. In this case, the retention of the existing structure, the need to upgrade the building fabric, and the heritage-led design approach all contribute to a development profile that would not reasonably support affordable housing obligations even if the threshold were met.
- 6.18 The applicant is committed to engaging constructively with the Council to agree the appropriate level of contribution in accordance with Policy H3 and the Council's adopted methodology – the analysis prepared on behalf of the applicant indicates that the scheme is not financially viable at any cascaded level of affordable housing percentage. The proposal is therefore policy-compliant, subject to the agreement of the Council with the applicant's financial review of the scheme.
- 6.19 Policy H5 (Standards for New Housing) requires all new dwellings to meet the nationally described space standards and to provide acceptable levels of daylight, sunlight, outlook and privacy. The proposed units meet or exceed the relevant space standards, and the design ensures that all habitable rooms benefit from appropriate natural light and outlook. The Noise Impact Assessment and Air Quality Assessment confirm that internal environments will be acceptable, with appropriate mitigation incorporated into the design.
- 6.20 Policy H10 (Private and Communal Outdoor Space) requires new residential development to provide adequate outdoor amenity space. The proposal achieves this through a combination of private patios and balconies, together with shared external space at ground level. This represents a balanced and policy-compliant approach to amenity provision in a constrained urban setting.
- 6.21 Policy H1 (Provision of Housing) and Policy CC6 (Accessibility and the Intensity of Development) encourage the efficient use of land, particularly in highly accessible locations such as the Reading Central Area. The proposal makes optimal use of a previously developed site that has been under-utilised for many years. The conversion and upward extension of Russell Hall represent a sustainable and efficient approach to housing delivery, avoiding the need for demolition and new-build construction while securing the long-term future of a non-designated heritage asset.
- 6.22 In summary, the proposal makes a positive contribution to Reading's housing supply by delivering six high-quality apartments in a sustainable, central location. The housing mix is justified by the physical and heritage constraints of the existing building, the character of the area, and the identified needs of the Borough. The scheme, as evidenced, falls below the affordable housing threshold and is therefore policy-compliant in not providing affordable housing. The proposal meets all relevant housing standards and represents an efficient and sustainable use of land in accordance with the Reading Borough Local Plan (2019).

Heritage, Townscape and Design

- 6.23 Russell Hall is not listed and is not identified as a building of townscape merit. Its contribution to the Conservation Area is modest and largely neutral due to its limited visibility and utilitarian character.
- 6.24 The Heritage Impact Assessment emphasises that the hall is largely hidden from public view and experienced primarily in private or semi-private contexts. The key elements of significance in the Conservation Area lie along Oxford Road itself, with

the rear yards and ancillary buildings forming part of the historic urban grain but not primary heritage assets.

- 6.25 The upward extension raises the eaves and ridge by approximately 1.5 metres and introduces dormers and rooflights. The Heritage Impact Assessment concludes that the increased height remains comfortably below surrounding buildings and within the general two- to three-storey context. The limited visibility of the hall means that the change will be perceived only in a small number of glimpsed views.
- 6.26 The form and materials are sympathetic and avoid visual competition with more significant heritage assets. The Conservation Area Appraisal identifies adjoining buildings as opportunities for improvement, whereas the proposal for Russell Hall retains and improves an existing building, removes unsympathetic additions and introduces a more coherent roofscape.
- 6.27 Overall, the scheme preserves the character and appearance of the Conservation Area and, in some respects, enhances it. Any change to significance is at the very lowest end of the “less than substantial harm” spectrum and is outweighed by public benefits including securing a viable long-term use, providing additional housing and improving the appearance and maintenance of the site. This is consistent with the NPPF and the statutory duty under Section 72 of the 1990 Act.
- 6.28 The design is simple, robust and contextual. The gabled form is retained and subtly extended. Materials are consistent with the Conservation Area palette. Openings are carefully proportioned and aligned, and dormers and rooflights are modest and subservient. The approach aligns with Reading Local Plan Policy CC7 and the NPPF’s emphasis on high-quality, sustainable design.

Residential Amenity, Noise and Internal Environment

- 6.29 The Noise Impact Assessment describes the site as a mix of commercial and residential properties typical of an urban environment, with road noise being the dominant source. A continuous environmental noise survey recorded daytime and night-time levels that fall within the “Low” noise risk category under ProPG, meaning the site is suitable for residential use with good acoustic design.
- 6.30 BS8233 and WHO guidelines recommend internal noise levels for living rooms and bedrooms. The Noise Impact Assessment applies the BS8233 façade calculation method and concludes that modest sound insulation is required, which can be achieved with standard double-glazed units and appropriate ventilation. Internal noise levels in habitable rooms will comply with BS8233 and ProPG guidance.
- 6.31 A small condenser unit associated with the ground floor commercial use at 117–119 Oxford Road was identified, but it could not be heard over background noise levels at the site façade. No specific plant noise mitigation is required beyond standard building fabric.
- 6.32 The proposed flats provide reasonable internal space and functional layouts, with windows to habitable rooms offering acceptable outlook. Private patios and balconies, together with shared amenity space, ensure a good standard of residential amenity. Privacy screens on balconies protect both internal and neighbouring amenity.

Air Quality and Exposure

- 6.33 The Air Quality Assessment confirms that the site lies within the Reading Town Centre AQMA. DEFRA background mapping shows annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} well below their respective objectives. Local diffusion tube monitoring also records annual mean NO₂ concentrations below 40 µg/m³.
- 6.34 The development is modest in scale and will generate only a small number of additional vehicle trips. The Air Quality Assessment concludes that the traffic impact is neutral and that the proposal will not cause or contribute to any exceedance of air quality objectives. No detailed dispersion modelling is required.
- 6.35 The key issue is the introduction of sensitive receptors into an AQMA. The Air Quality Assessment demonstrates that annual mean concentrations at the façade are expected to be below relevant objectives and that exceedances of short-term objectives are unlikely.
- 6.36 The scheme incorporates design-led mitigation, including the orientation of habitable rooms, provision of good ventilation and encouragement of sustainable travel.
- 6.37 The development is therefore compliant with national and local air quality policy.

Ecology and Biodiversity

- 6.38 The Preliminary Roost Assessment found no evidence of bats or bat roosts and concluded that the building is unlikely to support roosting bats.
- 6.39 A precautionary approach, such as an ecologist watching brief during key stages of works, can be secured by condition.
- 6.40 The site is otherwise of low ecological value. The conversion and modest external works provide opportunities for biodiversity enhancement, including integrated bat and bird boxes, native planting and potentially green roofs. These measures align with NPPF requirements and Reading Local Plan policies.

Transport, Access and Parking

- 6.41 The site is in a highly accessible location close to frequent bus services on Oxford Road and within walking distance of Reading West station. It is also within easy walking and cycling distance of town centre jobs and services.
- 6.42 The conversion of an existing building to six small flats will generate a modest number of trips, likely lower than the potential E use at full operation.
- 6.43 Existing vehicular and pedestrian access from Zinzan Street is retained and formalised. Visibility and manoeuvring are acceptable. A small number of parking spaces are provided within the undercroft and yard, consistent with Reading's central area parking standards and the sustainable location.
- 6.44 Cycle parking is provided in accordance with policy. The impact on the local highway network will be negligible and certainly not severe in NPPF terms.

Sustainability, Energy and Climate Change

- 6.45 The proposal inherently supports sustainable development through the re-use and adaptation of an existing structure, avoiding the embodied carbon associated with demolition and new build.
- 6.46 The compact form and central location reduce reliance on private car use and support sustainable travel. Conversion works will upgrade thermal performance relative to the existing 1920s hall.
- 6.47 The roof form and services strategy can accommodate efficient heating systems and renewable technologies where appropriate. These aspects align with Reading Local Plan policies and the NPPF's climate change objectives.

Planning Balance and Conclusion

- 6.48 The proposal delivers a range of clear planning benefits. It makes efficient use of land by re-using and adapting an under-utilised, largely deteriorating building on previously developed land in a highly accessible urban location.
- 6.49 It contributes to housing delivery by providing six new self-contained apartments in a sustainable location.
- 6.50 It achieves heritage betterment by retaining and sensitively enhancing Russell Hall, removing unsympathetic additions and improving long-term maintenance, thereby preserving and subtly enhancing the character and appearance of the Conservation Area.
- 6.51 The design is simple, contextual and respectful of local scale, form and materials. Environmental performance is improved through upgraded building fabric and services, reduced embodied carbon and sustainable travel patterns. Environmental impacts are limited, with noise, air quality, ecology and transport considerations all addressed satisfactorily.
- 6.52 The Heritage Impact Assessment demonstrates that the proposal will preserve the character and appearance of the Conservation Area and that any change to significance is at most very low-level "less than substantial harm", clearly outweighed by public benefits. The statutory duty under Section 72 of the 1990 Act is therefore satisfied.
- 6.53 When assessed against the development plan and all other material considerations, the proposal represents a sustainable, heritage-led conversion and extension of an existing building in a highly accessible urban location. It complies with the NPPF's presumption in favour of sustainable development, aligns with Reading Borough Local Plan policies on housing, design, heritage, air quality, amenity and transport, and delivers clear public benefits with no significant adverse impacts. The planning balance falls decisively in favour of granting planning permission.
- 6.54 Planning permission is therefore respectfully requested, subject to any conditions that are considered reasonable and necessary.