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Planning, Design & Access Statement

73-74 Broad Street, Reading

Creation of 4 self-contained flats
at second floor level

JUNE 2026

Walsingham Planning

Bourne House
Cores End Road
Bourne End
Buckinghamshire
SL8 5AR

Telephone
01628 532244



bourne.end@walsingplan.co.uk
www.walsinghamplanning.co.uk

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I INTRODUCTION

- I.1 This Planning, Design & Access Statement has been prepared in support of an application for full planning permission submitted to Reading Borough Council for the conversion of the second floor level into 4 new residential units at 73-74 Broad Street, Reading.
- I.2 The description of development is as follows:
- “Creation of 4 new residential units at second floor level, formation of new window openings and enlargement of existing window openings, refurbishment of existing stairwell and front entrance, creation of bin store at ground floor level.”*
- I.3 This application follows the withdrawal of a previous application for the same description of development at the same site (ref. PL/26/0179) where the Council requested some amendments be made to the scheme and additional information provided.
- I.4 Prior to this, an application for Prior Approval (ref. PL/25/1105) was granted on 06 November 2025 for the change of use of the second floor level from a commercial use to two flats.
- I.5 With the principle of the change of use established by this consent, this application for full planning permission seeks to create 4 flats within the same second floor level floorspace. This follow-up application is accompanied by updated floorplans and supporting information which addresses the Council’s previous concerns. It is concluded that the proposals accord with the Development Plan and the NPPF such that planning permission should be granted.

Document Structure

- I.6 This report provides background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, and is set out under the following sections:
- Chapter 2 provides the factual background to the site;
 - Chapter 3 sets out the proposals;
 - Chapter 4 sets out the relevant planning policy and guidance;
 - Chapter 5 discusses the planning issues and heritage considerations; and

- Chapter 6 sets out the conclusion.

Supporting Information

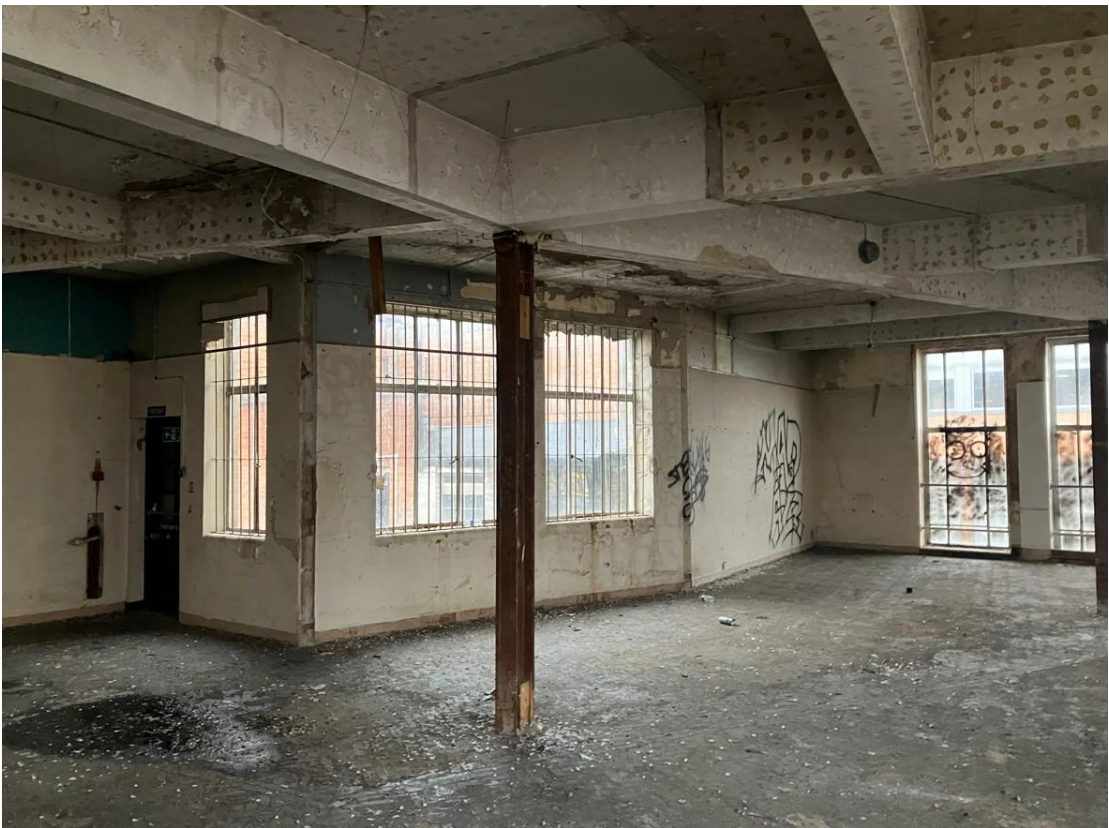
I.7 This Planning, Design & Access Statement should be read in conjunction with the following documents and drawings submitted in support of the application:

- Covering Letter
- Application Form
- CIL Questions Form
- Full set of existing and proposed drawings
- Environmental Noise Impact Assessment Report
- Mechanical Ventilation, Overheating & Odour Planning support Note

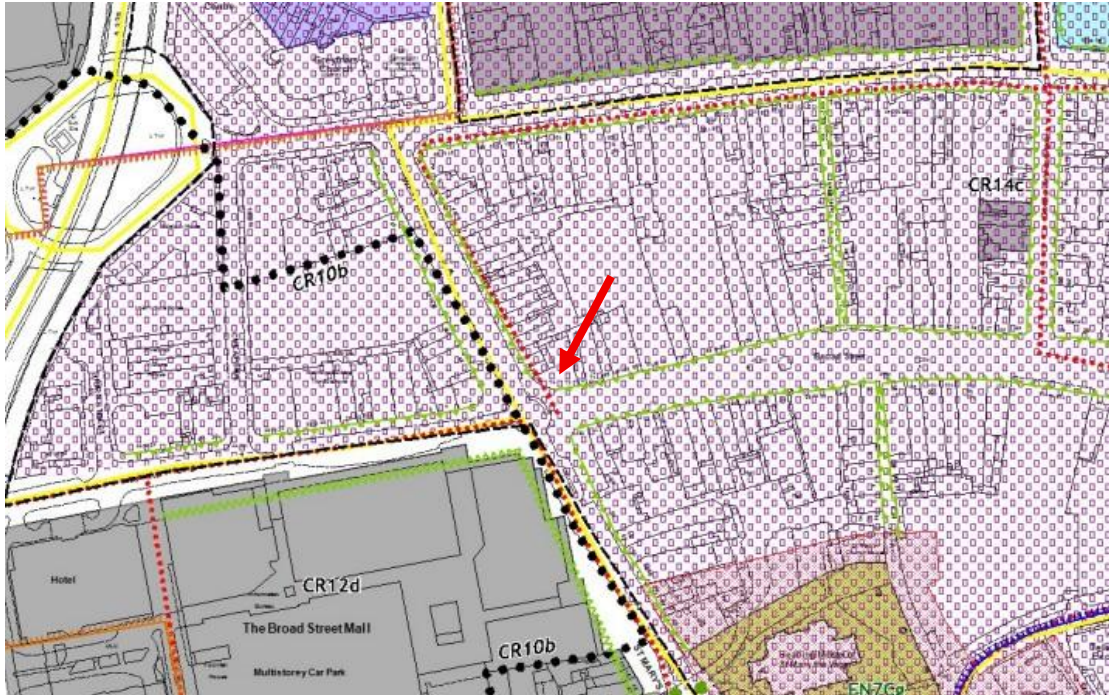
2 SITE AND SURROUNDINGS

- 2.1 The application site is 73-74 Broad Street, Reading. The second floor level is currently vacant and in an extremely poor state of disrepair, and the opportunity therefore exists to make efficient use of the site and consider alternative uses for this highly accessible town centre location.
- 2.2 A retail unit and hot food takeaway (a KFC) occupy the ground and first floor levels of the building. The second floor level is Class E commercial use ancillary to the floors below, but has not been used as such for some time as evidenced by the physical condition of the second floor level.
- 2.3 A fire escape and secondary entrance to the building is located on West Street, which connects to a staircase core providing access to the second floor level without having to go through the commercial units.
- 2.4 The building is 3 storeys in height but sits slightly higher than its neighbours due to the large floor-to-ceiling heights of the first and second floor levels. It is a prominent building occupying a corner position at the junction of Broad Street and West Street. Terraces of buildings extend away from the property eastwards and northwards, with commercial uses at ground floor levels with a mixture of commercial and residential uses above.





- 2.5 The building is not listed and does not lie in a Conservation Area. The nearest listed building is 67-68 Broad Street, several buildings to the east.
- 2.6 The site lies within the Central Core, Office Core, Primary Shopping Area, a Designated Primary Frontage in Central Reading, and Air Quality Management Area, and an Area of Archaeological Potential.
- 2.7 The site is in Flood Zone I and has a low probability of flooding from rivers and the sea.



Extract from the Council's Policies Map

Relevant Planning History

- 2.8 A planning application was withdrawn on 15 April 2026 (ref. PL/26/0179) which proposed the same description of development as this application, namely the *“Creation of 4 new residential units at second floor level, formation of new window openings and enlargement of existing window openings, refurbishment of existing stairwell and front entrance, creation of bin store at ground floor level.”*
- 2.9 The Council's concerns which lead to the applicant withdrawing the application can be summarised as follows:
- Unit mix (lack of a family-sized unit)

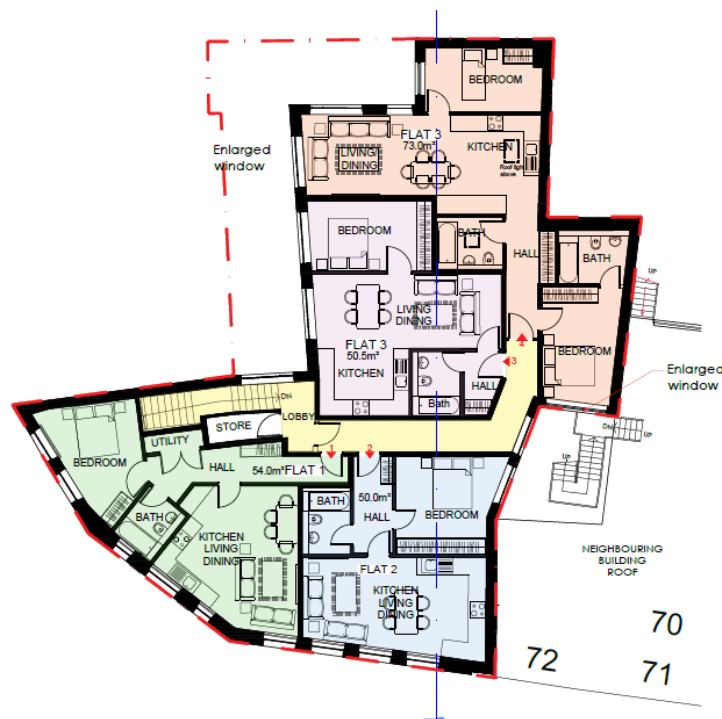
- Residential amenity of future occupiers (noise)
- Residential amenity of future occupiers (mechanical ventilation to flats)
- Internal arrangement of rooms and spaces (noise)
- Lack of provision of private outdoor amenity space
- Lack of bicycle parking provision
- Inadequate bin storage capacity

2.10 Full details and justification of how this application positively responds to these comments are set out in Chapter 5 of this document.

2.11 Prior Approval was given on 06 November 2025 (ref. PL/25/1105) for the change of use of the second floor level from a commercial use to two flats.

3 PROPOSED DEVELOPMENT

- 3.1 The second floor level of 73-74 Broad Street is currently vacant and semi-derelict. Previously it was ancillary commercial floorspace to the units below; however, it has not been used as such for a number of years.
- 3.2 The recent Prior Approval that was given at the site establishes the principle of converting the second floor into residential use, there is an extant consent to create 2 new residential units in this location. The consented units are large and fail to maximise the opportunity of this sustainably located town centre site.
- 3.3 The opportunity therefore exists to make more efficient use of the dilapidated second floor of the building. Recycling land and buildings to a more beneficial use and maximising opportunities such as this is one of the key thrusts of the NPPF.
- 3.4 It is proposed to convert the second floor of the building into 4 self-contained residential units comprising 3 x 1-bed units and 1 x 2-bed unit.



Proposed second floor plan

- 3.5 All units will receive good levels of daylight and sunlight, and the development avoids any units which are solely north facing.
- 3.6 Internal amenity will be protected through acoustically treated windows to the specifications set out within the accompanying noise report.
- 3.7 It is proposed to provide mechanical ventilation and comfort cooling to all flats, ensuring a good standard of internal amenity to future occupiers.
- 3.8 The internal layout of flat 4 has been adjusted to move the kitchen area away from the bedroom to flat 3.
- 3.9 Access is achieved from West Street and will utilise the existing fire escape staircase, which will be refurbished and upgraded to create a good quality residential entrance up to second floor level.
- 3.10 At ground floor level an enlarged communal bin store with sufficient waste and recycling bin capacity will be created, accessed from a communal entrance adjacent to West Street and with separate doors for servicing and collection which open out onto West Street.

4 RELEVANT PLANNING POLICY

- 4.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise.
- 4.2 In this case the Development Plan comprises the Reading Local Plan (2019).
- 4.3 The National Planning Policy Framework (NPPF) and associated guidance is also highly relevant to this application.

Reading Local Plan (2019)

- 4.4 The Presumption in Favour of Sustainable Development is set out at Policy CC1.
- 4.5 Policy CC2 ‘sustainable design and construction’ states that *“proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change”,* and states that *“all minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM ‘Very Good’ standard as a minimum.”*
- 4.6 Policy CC6 concerns the accessibility and intensity of development and states that *“the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.”*
- 4.7 Policy CC7 concerns design and the public realm. It states that *“all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”* and sets out a series of criteria development should adhere to.
- 4.8 Safeguarding Amenity is dealt with by Policy CC8 and requires *“development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties”* in terms of factors including (but not limited to) privacy and overlooking, noise and disturbance, and access to sunlight and daylight. It continues, stating *“the position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the*

circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.”

4.9 Policy H1 concerns the provision of housing and states that “*provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036*”. The supporting text emphasises how “*there is a pressing need for additional housing in Reading and the surrounding area*”.

4.10 Policy H2 seeks an appropriate density of residential development that will be informed by factors including but not limited to:

- The character and mix of uses in the area;
- The current and future level of accessibility; and
- The need to maximise the efficiency of the land.

4.11 In this town centre location Figure 4.5 stipulates an indicative density of above 100 dwellings per hectare.

4.12 Policy CR1 defines Central Reading and states that other main town centre uses will take place in the Central Core.

4.13 Policy CR6 ‘Living in Central Reading’ states:

Proposals for residential development within the central area will be assessed against the following criteria:

- 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.*
- 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.

- 4.14 Policy EN15 'Air Quality' states that "development should have regard to the need to improve air quality and reduce the effects of poor air quality."

"Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused."

- 4.15 Policy TR4 concerns cycle facilities and states that "developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities".

- 4.16 Policy TR5 concerns cycle parking and states that "development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport."

National Planning Policy Framework (December 2024)

- 4.17 The National Planning Policy Framework sets out the Government's intention for the planning system to contribute to the achievement of sustainable development, performing an economic, social and environmental role.
- 4.18 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11) which for decision-taking means that development proposals that accord with the development plan should be approved without delay.
- 4.19 **Section 4** of the NPPF (Decision-making) confirms that local planning authorities should approach decisions on proposed development in a positive and creative way by working proactively with applicants to secure developments that will improve the economic conditions of the area.

- 4.20 **Section 6** of the Framework (Building a strong, competitive economy) states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.21 **Section 7** of the Framework (Ensuring the vitality of town centres) highlights the importance of ensuring the vitality of town centres, where paragraph 90 states: *“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.”*
- 4.22 **Section 8** of the Framework (Promoting healthy and safe communities) reaffirms the importance of creating safe, healthy and inclusive places by ensuring that developments encourage walking and cycling.
- 4.23 **Section 9** of the Framework (Promoting sustainable transport) states that transport issues should be considered from the earliest stages of the process to ensure that potential impacts can be addressed so that opportunities for avoiding and mitigating any adverse effects can be included.
- 4.24 **Section 11** is concerned with making effective use of land, and paragraph 124 states that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.” Paragraph 125 also adds that planning decisions should: “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused”.
- 4.25 **Section 12** of the Framework (Achieving well-designed places) confirms that good design is a key aspect of sustainable development and creates better places in which to live and work. Paragraph 131 states that “the creation of high-quality beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve”.
- 4.26 A new NPPF was published for consultation in December 2025. The consultation has now ended, and there will be a period of time to collate and review the consultation responses, and the document’s content may be revised. Should the final version be published before the application is determined, then we will update this Planning Statement if required.
- 4.27 The application of the policies and guidance set out above is discussed in detail in the next chapter.

5 PLANNING CONSIDERATIONS

Principle of Development

- 5.1 The NPPF makes it clear that sustainable development has three overarching objectives: an economic objective to help build a strong, responsive and competitive economy; a social objective to support strong, vibrant and healthy communities; and an environmental objective to contribute to protecting and enhancing our natural, built and historic environment. The proposed development would support each of these three objectives.
- 5.2 The site is located on the corner of Broad Street and West Street, a main commercial street in the centre of Reading. It benefits from easy access to shops and services accessible on foot, and numerous public transport options including high-frequency bus services and the mainline railway station. It is sustainably located, and residents would not need to use a car.
- 5.3 Realising the potential of underutilised previously developed land and buildings such as the upper floors of this building is supported by all levels of planning policy; it is by definition sustainable development.

Land Use

- 5.4 The principle of residential development in this location is supported by all levels of planning policy. C3 residential is a town centre use that is appropriate for this location, located above existing commercial units.
- 5.5 The principle of residential development has also been established by the Prior Approval consent, which allows two residential units to be formed within the second floor of the building.
- 5.6 The Council cannot currently demonstrate a 5-year supply of deliverable homes. At the time of writing, the published position is 3.55 years, a significant shortfall. The tilted balance is engaged, and certain policies within the Plan can only be afforded limited weight.
- 5.7 The Prior Approval is for two large units, which is not making the most efficient use of land and buildings in accordance with the NPPF. An opportunity presents itself to maximise the opportunity of this sustainably located town centre site and create a higher number of smaller units, in accordance with paragraphs 124 and 125 of the NPPF.

- 5.8 It is proposed to create 3 x 1-bedroom units and 1 x 2-bedroom unit. The 1-bed units are 1b2p, and the 2-bed unit is 2b3p; therefore, the development does propose a mix of units.
- 5.9 The proposed increase from 2 to 4 units is in accordance with Policy H1 by contributing to Reading's housing supply and addressing an identified pressing need for additional housing.
- 5.10 The proposal is in accordance with Policy H2 by increasing the density of the development and ensuring this sustainably located town centre site is optimised.
- 5.11 Policy CR6 concerns living in central Reading and sets out criteria against which residential development will be assessed against:
- The site constraints of the second floor level of the building and the appropriateness of the location limits the ability to deliver family-sized units and a broader mix of units, and only 4 units are proposed in any event. A suitable and appropriate mix of smaller units is provided by creating 3 x 1-bed and 1 x 2-bed units.
 - It is a small site in a highly sustainable town centre location; it lends itself well to smaller units rather than larger or family-sized units. There is no opportunity to provide outdoor space, and there is no on-site parking; the building therefore is well suited to cater to single occupiers, couples, young professionals etc. seeking town centre living and the benefits that brings, rather than larger households or families.
 - A Noise Report accompanies the application which demonstrates that acceptable living conditions to the future occupiers of the residential units can be achieved. The same conclusions are reached as with the previous Prior Approval, which demonstrated acceptable internal amenity to the new flats.
- 5.12 It is therefore considered that in this instance an exception can be made to the mix of units preferred by Policy CR6 for the reasons outlined above. A mix of smaller 1-bed or 2-bed units has been provided, which is considered appropriate for this particular building in this town centre location in accordance with Policy CR6.
- 5.13 It is an entirely appropriate location for smaller units suited to single occupiers, couples, young professionals and is a less suitable location for larger units expected to have children residing in them (i.e. family-sized units). Applying a strict interpretation of Policy CR6 is not considered appropriate in this instance.

- 5.14 However, even if the Council consider there is a minor policy breach of Policy CR6 due to the lack of a family-sized unit – a position we do not agree with – then the scheme benefits this proposal will bring – including additional market housing and an affordable housing contribution – comfortably outweigh any minor breach. Even if the application doesn't strictly accord with Policy CR6, for the justifications set out above, it still is in compliance with the overall objectives of the Council's Local Plan including policies H1 and H2.

Design

- 5.15 The second-floor level of the building is currently in a poor condition internally and externally, with dilapidated windows and a semi-derelict appearance. The proposed development will enhance the exterior of the building and this part of Reading town centre by upgrading the windows and creating a second-floor space that is lived in and will exhibit activity.
- 5.16 The window openings on the facades will for the most part not be altered, but the windows themselves will be replaced and upgraded. Two new windows will be created to the bedrooms of flat 4, and existing windows enlarged as shown on the proposed second floor plan.
- 5.17 At ground floor level the existing doorway on West Street will be replaced and enhanced to create a good quality residential entrance to the 4 new flats above. It will result in this part of the street scene and elevation being enhanced and the visual amenity improved from what is currently a windowless fire escape door of low quality that detracts from the building and the street scene.
- 5.18 Whilst the external changes are minor, they will be an aesthetic upgrade on the existing building which stands to benefit the building and its immediate surroundings, in accordance with Section 12 of the NPPF and Policy CC7. The immediate urban environment of this part of Reading town centre will be enhanced through regeneration, repair, and good design.
- 5.19 Internally, the proposed floor plan has been arranged to maximise the many windows the second floor level of the building benefits from. All habitable rooms to the units receive natural daylight and sunlight, and 3 of the units are dual aspect with at least one south-facing window. The site constraints of the existing building and its orientation mean it is necessary for 1 unit to be single aspect, however it is west-facing and will enjoy good levels of daylight and sunlight, especially in the afternoon. No units are single aspect and north facing.

- 5.20 It should be noted that the Prior Approval scheme was assessed and considered to provide an acceptable level of daylight and sunlight received to the units.
- 5.21 All units meet the minimum nationally described space standards of 50sqm for a 1b2p unit or 61sqm for a 2b3p unit. All rooms exceed minimum room sizes.
- 5.22 The proposed mechanical ventilation system is internal and does not require rooftop plant.

Bin Store

- 5.23 A new dedicated bin store is located at ground floor level within the new residential entrance to the flats above.
- 5.24 In response to the Council's concerns with regards to the capacity of the previously proposed bin store on application ref. PL/26/0179, the proposed communal bin store serving 4 residential units has been enlarged to accommodate 2 x 240L general waste bins, 3 x 360L recycling bins, 1 x 240L food waste bin, and 1 x 240L glass bin.
- 5.25 The enlarged bin store is accessed from within the communal entrance internally, and via a set of doors onto West Street when it is collection day, as shown on the proposed ground floor plan.

Amenity

Noise

- 5.26 It will be necessary to provide robust acoustic attenuation to the facades and windows of the new flats in this busy town centre location. At the same time, flats above commercial premises in town centres are a common theme and not unusual; indeed, residential is a compatible town centre use.
- 5.27 It should be noted that noise and internal amenity were considered in the November 2025 Prior Approval application, and the proposed mitigation was considered to be an acceptable solution.
- 5.28 The Noise Impact Assessment accompanying this application has been prepared by the same consultant using the same background noise data, and reaches the same conclusion:

“Impacts of noise from commercial premises on the intended occupiers of the development are unlikely to occur at the proposed residential development if appropriate mitigation measures are implemented, which are detailed within this report.”

- 5.29 The new mechanical ventilation system is internal and does not require any rooftop plant or the introduction of new noise sources. Furthermore, mechanical ventilation will mitigate the impact of noise egress from the flue from the commercial fast food unit below. It ensures that the units are not solely relying on openable windows, and for potential amenity impact from a noise source beyond the scope of this application.
- 5.30 Previously, concern was raised at the arrangement of rooms and spaces at second floor level, specifically the relationship of the kitchen to flat 4 with the bedroom of flat 3. The main living space of flat 4 has been rearranged so that it is the living room of flat 4 next to the bedroom of flat 3, with flat 4’s kitchen moved towards the back of the room away from the bedroom.
- 5.31 Accordingly, the proposed development is in accordance with Policy CC8 by protecting the amenity of its occupiers.

Ventilation

- 5.32 Mechanical ventilation is proposed to all units to provide ventilation and comfort cooling and avoid the need for the units to rely solely on openable windows. The system is internal and does not require any rooftop plant.
- 5.33 As set out above, it will mitigate the impact of noise egress from the flue from the commercial fast food unit below and ensures that the units are not solely relying on openable windows which could be affected by a noise source beyond the scope of this application.
- 5.34 In response to officer comments on application ref. PL/26/0179, a Mechanical Ventilation, Overheating & Odour Planning Support Note accompanies this application. It confirms:
- *Ventilation to each dwelling will follow Approved Document F, with continuous mechanical ventilation recommended (MVHR preferred) to suit the town-centre setting and the single-aspect and rooflit nature of several units.*
 - *Overheating will be addressed through a passive-first strategy of limiting solar gains and providing an adequate means of removing heat in accordance with Approved Document O,*

with quantified compliance to be demonstrated by CIBSE TM59 dynamic modelling at the next design stage.

- *Odour transfer from the commercial premises will be controlled through the separation of intakes and discharges, high-level discharge and abatement of any commercial kitchen extract, the sealing of service penetrations, an airtight separating floor and positive-pressure residential ventilation, with an odour-control scheme recommended to be secured by condition.*

5.35 Accordingly, the proposed development is in accordance with Policy CC8 by protecting the amenity of its occupiers.

Outdoor Amenity Space

5.36 The proposed development is for the conversion of the second floor level of an existing building, delivering sustainable development which is acceptable in principle and in accordance with all levels of planning policy.

5.37 It is not uncommon for flats to be located above commercial units in town centre locations such as this; indeed, within central Reading this is common and characterises parts of the town centre.

5.38 The site constraints do not allow for the creation of good quality private or communal outdoor amenity space. Furthermore, providing (for example) balconies or a roof terrace would give rise to visual impact considerations, privacy and overlooking considerations, and amenity impact of future occupiers in this busy town centre location.

5.39 There are parks, areas of public open space and green space within walking distance of the site including Forbury Gardens, Christchurch Meadows, and Kings Meadows. Future occupiers would have access to outdoor green space accessible on foot, a situation not uncommon in Reading town centre.

5.40 Given the site constraints and the building's unsuitability to provide private outdoor amenity space, it is considered this minor policy breach of Policy H10 is acceptable in this instance and is outweighed by the numerous scheme benefits the proposal delivers.

Parking

- 5.41 The development will be car-free; the site constraints do not allow for any on-site vehicle parking. The site is sustainably located, and residents would not need to use a car. It is a busy town centre location which benefits from easy access to shops and services accessible on foot, and numerous public transport options including high frequency bus services and the mainline railway station.
- 5.42 The site constraints do not allow for bicycle parking facilities on site. The flats themselves are located at second floor level and are of sufficient size and layout to allow for bicycles (including folding bikes) to be stored within them. The bin store is not considered a suitable location or of sufficient capacity for a dual-use bin store/cycle parking for operational reasons and for security.
- 5.43 As set out above, the location is highly sustainable with many shops, services, and an excellent array of public transport options all accessible within a short walk.
- 5.44 Given the site constraints and inability to provide a dedicated secured bicycle store on site, it is considered this minor policy breach of Policy TR5 is acceptable in this instance, and is outweighed by the numerous scheme benefits the proposal delivers.

Sustainability

- 5.45 The Council have previously confirmed that the proposal is sought to be built to acceptable standards, and that a suitably worded condition can secure post-construction certification that an appropriate standard had been met.

Air Quality

- 5.46 The site lies within the central Reading Air Quality Management Area. Policy EN15 states that where a development would introduce a sensitive use such as residential in a location such as this, then mitigation measures should be detailed in any planning application.
- 5.47 The supporting text sets out examples of such mitigation measures, proportionate to the site context, nature of development, and scale of the proposal: *“in some circumstances this could also include, in the case of mixed use development, limiting the residential accommodation to higher floors”* and *“other mitigation measures may also include restrictions in car access or parking”*.

- 5.48 In this instance the proposal is to reuse an existing building, which proposes residential accommodation on the second floor of the building, i.e. the upper floors of a mixed use building. It is a car-free development, whereby future residents would walk or use public transport in this highly sustainable location.
- 5.49 The proposed development will not increase air pollution and does not represent a worsening of the situation within the AQMA.

CIL

- 5.50 The building is 'in use' for the purposes of CIL and does not represent chargeable development. The lower floors of the building are occupied and in use by a small retail unit and a larger KFC.

Access Statement

- 5.51 Access will be achieved from West Street via the existing secondary entrance to the building, which currently provides direct access to the upper floors through a stair core.
- 5.52 The existing service door will be replaced with a new door that will be welcoming and residential in character.
- 5.53 New doors will provide direct access from West Street into the communal bin store for use only on collection days.
- 5.54 The existing fire escape at second floor level which exits onto the adjacent roof is surplus to requirements, and a security risk; it will be blocked up, and a window will be installed in its place.

6 CONCLUSION

- 6.1 The second floor level of 73-74 Broad Street is currently vacant, has been stripped out, and is in a semi-derelict state of disrepair.
- 6.2 Following the granting of Prior Approval for the conversion of the second floor level of the building into two residential units in November 2025, the revised proposal seeks to maximise the opportunity of the building to create 4 new residential units.
- 6.3 The principle of residential use at second floor level has been established by the extant consent. However, in its own right the proposed change of use from commercial floorspace to residential is acceptable; residential is a town centre use and flats above commercial premises are a common theme in town centres such as Reading.
- 6.4 It is by definition sustainable development, recycling existing land and buildings and bringing them back into gainful use. It is making the most effective use of previously developed land and buildings.
- 6.5 The Council cannot currently demonstrate a 5-year supply of deliverable homes. 4 new residential units will contribute towards the Borough's housing stock and provide new town centre flats for the Borough's residents.
- 6.6 The location is highly sustainable, within easy walking distance of the shops and services of Reading town centre, and within easy walking distance of numerous bus routes and the mainline railway station.
- 6.7 The new units all comply with relevant space standards and amenity standards, any noise impact from this town centre location can be satisfactorily mitigated. Mechanical ventilation and comfort cooling ensure the units do not have to rely on openable windows for ventilation.

Response to Council's Comments

6.8 This application updates the previously withdrawn application ref. PL/26/0179 in a number of areas in response to the Council's comments, and provides justification where required, as follows:

1. Unit mix – the site's location in a busy part of central Reading coupled with the site constraints means it is ideally suited to a larger number of smaller units, where it is expected they would be occupied by young professional single occupancy or couples. The site is considered less suitable for family-sized units and children. The proposal maximises the potential of the site, optimises capacity, achieves a higher density in this highly sustainable location, and delivers housing to contribute to the Borough's housing supply.
2. Noise – the noise report confirms an acceptable level of amenity to the future occupiers of the flats. The internal layout of unit 4 has been adjusted in response to officer comments.
3. Ventilation – mechanical ventilation is proposed to all flats, ensuring an acceptable level of amenity to the future occupiers of the flats.
4. Outdoor Amenity Space Provision – the site constraints do not allow for the provision of good quality amenity space. The proposed development is a conversion above a commercial premises, a situation common in central Reading. Future occupiers will have access to parks and public open space within walking distance of the site.
5. Bicycle parking provision – similarly, the site constraints do not allow for the provision of a secure bicycle store at ground floor level. The arrangement of flats above commercial premises in a town centre location is not uncommon and does not lend itself to bicycle parking provision. This site is a highly sustainable location with easy and convenient access to shops, services, and public transport.
6. Bin store capacity – the bin store has been enlarged to accommodate the required waste and recycling bins.

The Balancing Exercise

- 6.9 At the time of writing, the Council cannot currently demonstrate a 5-year supply of deliverable homes. The published position is 3.55 years, a significant shortfall. The tilted balance is engaged, and certain policies within the Plan can only be afforded limited weight.
- 6.10 We are firmly of the view that there is strong justification for the minor policy breaches outlined above which makes the development acceptable in this instance in its own right. The site constraints do not allow for bicycle parking or amenity space provision, and the site's location is much better suited to smaller units.
- 6.11 However, even if the Council consider the minor policy breaches weigh against the proposed development – a position we do not agree with – then the scheme benefits positively outweigh in favour of the granting of planning permission:
- It is sustainable development.
 - It represents the reuse of previously developed land and buildings.
 - It is optimising the capacity of the site and increasing density in a town centre location.
 - It will deliver 4 units of market housing.
 - It will provide financial contribution towards the provision of affordable housing.
 - It represents the creation of good quality residential units in a highly sustainable location that will encourage walking and public transport use, and reduce reliance on private car ownership.
- 6.12 It is not considered there to be any elements of the proposals which are contrary to any adopted policy or guidance that have not been satisfactorily justified. On the other hand, the works are supported by numerous policies specifically in relation to maximising the opportunity of existing land and buildings and creating new residential units in a highly sustainable town centre location.
- 6.13 For all of the above reasons it is considered that the proposed development is in accordance with the policies of the Reading Local Plan and the National Planning Policy Framework, and it is respectfully requested that planning permission is granted.