
Town Planning and Affordable Housing Statement

Soane Point, 3-10 Market Place, Reading,
RG1 2EG

EXECUTIVE SUMMARY

- 1.1. The submitted development proposals include improvements to the existing building facades, upwards extensions and the delivery of 38 new homes. The proposals present an exciting opportunity to significantly improve and make better use of an existing poor quality building, located within a highly accessible location within Reading Town Centre.
- 1.2. The Applicant has positively engaged with the Council, key stakeholders and the local community in developing a high-quality design approach which will enhance the character of the conservations area and setting of heritage assets.
- 1.3. The building currently benefits from Prior Approval to convert the building into 144 residential units (reference: 210478), whilst retaining the existing facades. This new proposal is a unique opportunity to completely transform the appearance of the building and the surrounding area, something that will not possible under the permitted scheme.
- 1.4. The principle of development and residential use of the site is wholly supported by the Local Plan. A high quality design approach is proposed which will enhance the character of the area, enhance the London Road Conservation Area and also the setting of the nearby listed buildings. The proposal will make efficient use of this highly accessible town centre site and will deliver much needed additional housing. The application demonstrates that the proposals will deliver high quality housing, including affordable housing, and that it will not result in unacceptable impacts to neighbouring amenity, the environment and transport.
- 1.5. Sustainable design measures are adopted including an energy efficient design, use of renewable energy and retaining the existing building to lower carbon emissions. The scheme also results in biodiversity improvements such as planters, landscaped roof area and the addition of tree planting.
- 1.6. The proposal has been assessed against the planning policy context and has been demonstrated to be in accordance with national and local planning policies and guidance.

Town Planning Statement

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2. Introduction

2.1. This Town Planning Statement has been prepared on behalf of our client 'Tene Living (Reading) Ltd' to support a full planning application for development proposals at Soane Point, 3 – 10 Market Place, Reading, RG1 2EG, which involve improvements to the existing building facades, upward extensions and the delivery of 38 new homes.

2.2. The description of development for the planning application is as follows:

“External works to existing building, including partial replacement of the existing façades fronting Market Place and Abbey Square alongside other external works to the building; set back single-storey extension above part of block fronting Market Place, part two part three storey extensions above other blocks; and conversion and alterations to ground floor reception and car parking area; together the works will deliver 38 new homes and (internal and external) residential amenity areas with associated car parking.”

2.3. The proposals present an exciting opportunity to significantly improve and make better use of an existing building of poor appearance, located within a highly accessible location within Reading Town Centre. The Applicant has positively engaged with the Council, key stakeholders and the local community in developing a high quality design approach which will enhance the existing character of Market Place conservation area, and the setting of the nearby heritage assets. The proposal will also provide a policy compliant level of much needed affordable housing, through a mix of unit types whilst also delivering housing within the borough.

Accompanying Reports

2.4. This Statement describes the development proposals and assesses these against the relevant planning policy framework. It should be read in conjunction with the accompanying application drawings and a number of specialist reports which have been prepared to support the application. These reports include the following:

- Design and Access Statement, prepared by TP Bennet Architects;
- Heritage Statement prepared by Stephen Levrant Heritage;
- Landscape & Visual Impact Assessment prepared by Stephen Levrant Heritage;
- Statement of Community Involvement prepared by MPC;

- Air Quality Assessment prepared by AQA Ltd;
- Transport Statement, prepared by TPS;
- Travel Plan, prepared by TPS;
- Flood Risk and Drainage Statement (including SUDs Proposals), prepared by Civilistix;
- Daylight and Sunlight Report, prepared by T16 Design;
- Noise Impact Assessment, prepared by Venta Acoustics Ltd;
- Energy Statement, prepared by T16 Design;
- Sustainability Statement, prepared by T16 Design;
- Fire Statement prepared by BB7;
- Preliminary Roost Assessment, prepared by Arbtech; and
- Biodiversity Net Gain Assessment, prepared by Arbtech.

2.5. This Statement comprises the following sections:

- Chapter 1 – Introduction (this section);
- Chapter 2 – Site and Surrounding Area;
- Chapter 3 – Planning History;
- Chapter 4 – Pre-Application Engagement;
- Chapter 5 – The Proposal;
- Chapter 5 – Planning Policy Context;
- Chapter 6 – Planning Considerations (including Affordable Housing Statement); and
- Chapter 7 – Conclusion.

3. Site and Surrounding Area

- 3.1. 'Soane Point' is in a highly accessible location at 3 - 10 Market Place, within Reading Town Centre. It comprises an existing office building with other commercial and retail uses at ground level fronting Market Place (including a supermarket and dentist). The building is made up of conjoined blocks at various heights. The building rises to 4 storeys with a setback part fifth storey overlooking the town's historic Market Place. A series of concrete columns support an overhang of the upper floors over the Market Place pavement. To the rear, the building rises to 3-6 storeys facing Abbey Square and a service access road. There is a connecting block between the west and east blocks, and a storey level difference between Market Place and Abbey Square. Adjoining the site to the north is a 4 storey (with setback fifth storey) E Class building with retail use on the ground floor with and office above which has recently been granted permission to change to residential on the above ground floors. To the south is a 4-storey hotel building.
- 3.2. The building was constructed in the 1960s in a brutalist architectural style, incorporating a concrete façade facing Market Place and brickwork facades elsewhere. The principal entrance to the building is off Market Place. Vehicular and service access is provided from the rear adjacent to Abbey Square. Existing car parking for the building is provided at ground and lower ground floor level to the rear of the Site.
- 3.3. Prior approval has been given for the conversion of the existing office floorspace within the building to residential use (see Section 3). This application therefore relates to the remaining parts of the building.
- 3.4. The Site is situated in Reading Town Centre and is bound to the north, east and south by retail, commercial uses and residential development, whilst to the west it is bound by Market Place Square where there are further residential uses. A broad mix of town centre uses occupy the buildings in the area, with shops, restaurants, cafes, bars and financial and other services found at street level. The area has a variety of building types and scales, with no dominant architectural style or material.
- 3.5. Market Place is home to a number of listed buildings. The Site and its surroundings are located in the Market Place/London Street Conservation Area. Heritage assets in the area include Grade II listed buildings at 1 & 2 Market Place directly to the south the site, the former National Westminster Bank at 13 -16 Market Place to the north of the Site and the Grade II* Simeon Monument directly opposite. The Church of St Laurence's

(Grade I) is located to the north of the site. The Site itself contains no designated heritage assets. It is of no special historic or architectural merit and is identified in the Council's Conservation Area appraisal document as modern architecture that fails to respect its historic setting, having a negative impact on the townscape around it. The site is also located within an Area of Archaeology Potential.

- 3.6. The Site is within flood zone 1, where the risk of flooding is lowest, and within an Air Quality Management Area.
- 3.7. The Site is situated in a highly sustainable and accessible location for development, and benefits from excellent access to a range of sustainable modes of transport. There are excellent walking and cycling opportunities locally, with a wide range of amenities accessible within the town centre. Reading train station is accessible within a 5 minute walk; this is a major national rail hub that can be utilised for long distance journeys. A number of bus stops are located along Market Place including one directly in front of the Site, and frequent bus services are available within a short walk of the Site to destinations across Reading and the surrounding region.

4. Planning History

4.1. The planning history associated with this Site is summarised in the table below.

LPA Reference Number:	Description	Decision
210478 Appeal reference: APP/E0345/W/21/3284108	Change of use of part of the ground floor, part basement, and upper floors from office use Class B1(a) to C3, 144 studio apartments. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015	Prior Approval Refused 13/05/2021 Appeal allowed: 24/05/2022
211261	Change of use of Soane Point from Class B1(a) (offices) to C3 (dwelling houses) to comprise 93 Dwellings. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Prior Approval Granted 22/09/2021
210880	Change of use of building Class B1(a) (offices) to C3 (dwelling houses) to comprise 100 dwellings. Prior notification under class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)	Prior Approval Refused 20/07/2021
211018	Change of use of building Class B1(a) (offices) to C3 (dwelling houses) to comprise 100 dwellings. Prior notification under class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended)	Prior Approval Refused 20/07/2021
200918	Internal and external refurbishment works to existing office building, including alterations to building frontage on Market Place and Abbey Square, roof extensions of between 1 and 3 storeys to existing building and five storey side extension to the north elevation to Abbey Square to provide a total 10, 921 sqm of new and refurbished B1 (a) office space with servicing from Abbey Square and retention of existing ground floor retail units on Market Place	Withdrawn 20/01/2021

- 4.2. The site benefits from 2 recent Prior Approvals which allow the conversion of the existing office use to residential. The first approval, allowed at appeal on 24th May 2022 (ref: APP/E0345/W/21/3284108), permits the change of use from offices to 144 residential units. The second approval (ref: 211261), permits the change of use from offices to 93 residential units and was granted on 22nd September 2021.
- 4.3. A full planning application (ref: 200918) for '*internal and external refurbishment works to existing office building, including alterations to building frontage on Market Place and Abbey Square, roof extensions of between one and three storeys to existing building and five storey side extension to the north elevation to Abbey Square to provide a total 10,921 sqm of new and refurbished B1 (a) office space with servicing from Abbey Square and retention of existing ground floor retail units on Market Place*' was withdrawn in January 2021.

5. Pre-Application Engagement

5.1. Paragraph 39 of the National Planning Policy Framework (NPPF) outlines the benefits of pre-application engagement and states that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community”*. Having regard to this, the Applicant has positively engaged with the Council, key stakeholders and the local community in developing the proposals. As explained within Section 2 of the Design and Access Statement, through an iterative design process, the scheme has evolved to take account of the comments received from the Council, and other stakeholders. A summary of the engagement undertaken, and the feedback received is provided below.

Pre-Application Discussions with Reading Borough Council

5.2. The emerging proposals have been discussed with RBC Officers at 2 pre-application meetings, held on 17th November 2021 and 13th April 2022. Following the first meeting, a formal written response was then received from RBC on 6th January 2022. The Council provided feedback relating to the retention of the building, the setting of the building within the Market Place / London Street Conservation Area, the external façade treatment, the scale and massing of the upwards extensions, the unit mix, the possibility of a pedestrian link through the site, and the impact of the proposals on amenity of nearby residents.

5.3. The feedback received was carefully considered by the design team, with further assessment carried out and design amendments made. The revised proposals were then presented to RBC (planning, design and conversation officers) at the follow up pre-application meeting (ref: 211700/PREAPP) in April 2022. The formal written feedback was received on 27th June 2022, which also took account of comments made by the Design Review Panel following a DRP meeting held on 19th May 2022. A summary of the feedback received is provided below:

- RBC stated that any proposals which seek the retention/upgrade of the existing building needs to demonstrate a very high level of design quality in order to overcome the negative visual impact of the existing structure;

- The reduced massing, and setting back of the roof extension is considered to result in a more subservient appearance to this part of the roof top extension and would not appear unduly prominent to views from Market Place and within the Conservation Area as it would reflect the predominant height of existing buildings within Market Place when viewed from within the square;
- The combination of all the detailed design features to the front façade results in a building which presents itself with more verticality and assists in reducing the dominance of the existing structure when viewed from Market Place;
- Verticality of the façade and historic references to the former burgage plots on the site could be further emphasised via greater variation to the parapet height, brickwork combinations and tones for each of the sections of the building with reference to the varying heights of the historic roofline of buildings to the site;
- The recessed fifth storey of the building could benefit from use of a different material such that the bronze/zinc cladding indicated for use to the proposed six and seventh storey extension elements to help distinguish this level of the building from the floors below and allow greater visual subservience;
- The finish of the columns to the ground floor colonnade of the building could be of a natural stone colonnade as this would reflect the stone finish to the ground floor frontage of a number of listed buildings set around Market Place;
- The rationale for lack of a pedestrian link is noted however as a policy requirement this will be considered within the overall planning balance;
- The proposed development would be expected to contribute towards improvements to the high street through repair or restoration of original features or improvements to shared spaces as it sits within the Council's High Street Heritage Action Zone (HSHAZ);
- Additional landscaping to the rear of the site welcomed; and
- Requested that a daylight and sunlight report is submitted with the application to assess the impact of the proposals on adjacent developments.

Reading Design Review Panel

- 5.4. The emerging proposals were presented to the Reading Design Review Panel on 19th May 2022. The feedback received was considered by RBC officers in providing their written response, as summarised in the

preceding section.

Reading Conservation Area Advisory Committee (CAAC)

- 5.5. Based on the site's location within the Reading and London Road Conservation Area, and having regard to other nearby heritage assets, pre application engagement was undertaken with the Reading CAAC.
- 5.6. A virtual meeting was held with applicant team and the CAAC on 20th May 2022 where the proposals were presented, and feedback was provided.

The CAAC concluded that the proposals represented a significant improvement to the existing building.

A summary of the feedback received is provided below:

- Suggestion that the brickwork on the front elevation could have more variation in colour in individual blocks;
- Welcomed the retention of the ground floor retail uses;
- Improved façade to the rear fronting Abbey Square to be considered (including attractive gates to the car park); and
- Suggestion of including some art within the scheme.

Community Engagement

- 5.7. Community engagement specialists MPC were instructed to lead of the public engagement for the emerging proposals. MPC arranged for a community newsletter to be sent to 689 residents and businesses within the vicinity of the site. This newsletter invited stakeholders to partake in an online presentation with question and answer session which was held on 21st July 2022. To ensure an inclusive consultation process, members of the public with no internet access were invited to call a member of the team to discuss the proposals directly. In total 5 respondents registered for the online event, and one phone call was received. The consultation process and feedback received is outlined in full within the Statement of Community Involvement submitted alongside this application.

5.8. A summary of the feedback received, and how the scheme has responded is provided below:

Key Theme	Response
A respondent to the consultation asked if any affordable housing will be provided	Of the proposed new homes, 30% will be affordable, which works out at 11 homes. The mix of affordable offer will be Reading Affordable Rent and Shared Ownership
A respondent asked what measures were being taken to ensure the development would be sustainable.	The redevelopment will not require the building to be knocked down and built from scratch which will reduce carbon emissions during construction. The embodied carbon within existing structure is therefore retained and not wasted. It is also an all-electric scheme, therefore none of the units will run off gas or oil which will decrease pollution. An increase of biodiversity which the application provides, including new greenery on the site, will also improve the sustainability of the site.
A respondent to the consultation asked if any car parking, or cycle parking will be provided	Parking is already provided as part of the existing building and even with an uplift in flats, a policy compliant level of parking will be retained. Cycle parking will also be provided as part of the plans. The proximity of the site to the train station and other amenities makes it an ideal location for those without cars to live as they can use more sustainable forms of transport.

Table Summary of Public Consultation

6. The Proposal

- 6.1. The proposals involve the retention of the existing building, with external works proposed to significantly improve the appearance of the building and to enhance the character of the area. Upwards extensions above the existing building are proposed, ranging from 1 to 3 storeys, together with the conversion of ground floor car parking area to deliver 38 new homes alongside (internal and external) residential amenity areas

Improvements to Facades of Existing Building

- 6.2. The proposals will significantly improve the appearance of the existing building which is poor and unsympathetic to its historic context. The works include:
- Replacement of façade facing Market Place, introducing 4 identifiable façade elements which will add verticality and interest through the use of a variety of brick tones;
 - Replacement of the façade facing Abbey Square;
 - Retention of existing shopfront and refurbishment of main entrance on Market Place;
 - Increased natural surveillance over Abbey Square, noting conversion of ground floor car parking area; and
 - Use of high quality materials, predominantly brick, chosen having regard to local context and the conservation area.

Upwards Extensions

- 6.3. Upwards extensions are proposed above the existing building, as described below:
- One storey addition over the northern part of the Market Place block, stepped back from the street;
 - A part 1, part 2 storey addition to the rear block facing the inner courtyard and Abbey Square, set further back from Market Place frontage; and
 - A part 2 and part 3 storey addition to the rear blocks facing Abbey Square.

High Quality Residential Accommodation

- 6.4. The scheme will deliver 38 self-contained residential units, with 32 of these provided within the upwards

extensions and 6 through the conversion of the ground floor. In addition, internal residential amenity space is proposed within the existing and new floorspace, along with external amenity space including landscaping roof terraces.

6.5. The proposed housing mix is as follows:

	1 Bedroom	2 Bedroom	3 Bedroom	Total
Market	11	14	2	27
Affordable	5	5	1	11
Total	16	19	3	38

Proposed Unit Mix

Parking

6.6. 20 Car parking spaces will be provided, 10% of these will have access to an electric charging point.

6.7. 21 cycle parking will also be provided in the lower ground floor in secure cycle stores.

Amenity and Communal Space

6.8. All homes will have access to communal terraces situated on the 4th and 5th floor. 5 homes will have access to their own private terrace on the sixth floor. There is also a communal courtyard, and external amenity space on the ground floor which will be accessible to all residents.

6.9. In addition to the above, all units will have access to the communal internal areas located on the ground floor. There is an additional communal room proposed on the fifth floor.

Inclusive Design

6.10. 3 homes have been designed in line with Part M4(3) of the Building Regulations (equivalent to 8% of the homes). These are located on the ground and third floor. The remaining homes have been designed to comply with Part M4(2) of the Building Regulations. As noted above, there will be 3 disabled parking bays within the basement also.

6.11. The homes on the upper floors will be served by lifts. A ramp is proposed for the secondary access from Abbey Square meaning step-free access will be available from both the Market Place and Abbey Square entrances.

Energy and Sustainability

6.12. The proposals have been designed to incorporate sustainable design measures, including:

- Air source heat pumps;
- Significant fabric improvements and good air tightness;
- Water efficiency measures of 94.7l/person/day;
- Promotion of sustainable travel behaviour via Travel Plan, provision of cycle parking and electric vehicle charging points;
- Sustainable urban drainage measures including green roofs, permeable paving, green planters and rain gardens;
- Ecological enhancements resulting in 10% biodiversity net gain;
- Sustainable construction measures including implementation of Site Waste Management Plan; and
- Each home will have the appropriate provision for waste and recycling with a refuse store for the residents located on the lower ground floor.

7. Planning Policy Context

7.1. This section of the statement provides an overview planning policy framework that is relevant to the site and proposals.

7.2. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004:

“When making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”

7.3. For the purpose of section 38(6) of the Planning and Compulsory Purchase Act, the Development Plan for the site comprises:

- Reading Local Plan Saved Policies (adopted November 2019)
- Reading Proposals Map (adopted November 2019);

7.4. Material considerations relevant to this proposal include:

- National Planning Policy Framework (NPPF) (2021);
- Planning Practice Guidance;
- National Design Guide; and
- Reading Borough Council supplementary planning documents including:
 - Affordable Housing SPD (March 2021),
 - Revised Parking Standards and Design SPD (October 2011),
 - Planning Obligations SPD (April 2015),
 - Design Guide for Shopfronts SPD (January 2022)
 - Sustainable Design and Construction SPD (December 2019), and
 - Employment, Skills and Training SPD (April 2013).

7.5. The site itself is allocated for development in the Reading Borough Local Plan (adopted in November 2019) under Policy CR14. The allocation states:

“CR14e 3-10 MARKET PLACE, ABBEY HALL AND ABBEY SQUARE 3

Development for retail and related uses on ground floor with residential and/or offices on upper floors, designed to enhance contribution of site to Conservation Area. Possible pedestrian link between Market

Place and Forbury Square/Abbey Square. Rear servicing and preservation of historic building line.

Development should:

- *Enhance the Conservation Area and the setting of adjacent listed buildings;*
- *Reflect the prevailing height of Market Place;*
- *Take account of the high potential for archaeological significance;*
- *Address noise impacts on residential use; and*
- *Address air quality impacts on residential use.*
- *Site size: 0.29 ha 46-70 dwellings plus ground floor town centre uses"*

NATIONAL PLANNING POLICY AND GUIDANCE

National Planning Policy Framework (NPPF)

- 7.6. A revised National Planning Policy framework (NPPF) was published by the UK Government's Ministry of Housing, Communities and Local Government on 20 July 2021. This is the second revision of the National Planning Policy Framework since 2018. The NPPF provides an overarching framework for the production of local policy documents and planning decisions.
- 7.7. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). Sustainable development is defined as having 3 overarching objectives: economic, social and environmental.
- 7.8. Details of these objectives are provided at Paragraph 8, stated below:

"An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low economy."

- 7.9. For decision making, the presumption in favour of sustainable development means that development proposals

that accord with an up-to-date development plan should be approved without delay.

- 7.10. The NPPF seeks to support the Government's objective of significantly boosting the supply of homes through provision of a sufficient amount and variety of land (paragraph 60). Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while improving the environment and ensuring safe and healthy living conditions (paragraph 119).
- 7.11. Paragraph 120 encourages planning decisions to promote the development of underutilised land and buildings, especially where this would help to meet identified needs for housing where land supply is constrained. In particular, the NPPF refers to upward extensions to create new homes where the prevailing height of the area and street scene allows. Paragraph 124 and 125 states that planning decisions should support development that makes efficient use of land, while also creating beautiful and sustainable places.
- 7.12. Section 7 relates to ensuring the vitality of town centres, with planning decisions supporting the role of these by taking a positive approach to their growth, management and adaption. Paragraph 86 (a) supports a mixture of uses here including housing in response to the changing demand patterns.
- 7.13. Section 8 contains policies which promote healthy and safe communities and identifies the important role the planning system has in facilitating social interaction and creating healthy, inclusive communities.
- 7.14. Paragraph 111 states the development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development are required to give priority first to pedestrian and cycle movements; address the needs of people with disabilities and reduced mobility; create places that are safe, secure and attractive; and allow for the efficient delivery of goods, and access by service and emergency vehicles (paragraph 112).
- 7.15. Good design and the creation of high quality, beautiful buildings and places is a key aspect of sustainable development (paragraph 126), and development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (paragraph 130).

- 7.16. Section 14 contains policies which are designed to ensure that the planning system supports the transition to a low carbon future in a changing climate. Paragraph 154 encourages new development to: avoid increased vulnerability to the range of impacts arising from climate change; and help to reduce greenhouse gas emissions.
- 7.17. Paragraph 180 requires opportunities to improve biodiversity in and around developments to be integrated, especially where this can secure measurable net gains for biodiversity.
- 7.18. Conserving and enhancing the historic environment is key to Section 16 of the NPPF. The policy notes that heritage assets should be conserved in a manner appropriate to the significance so they can continue to be enjoyed. The significance of heritage assets should be assessed on how development proposals affect this, and proposals should avoid conflict between heritage assets and the proposed development.

Planning Practice Guidance

- 7.19. On the 6 March 2014 the DCLG launched the Planning Policy Guidance (PPG). The PPG replaces the majority of previous planning practice guidance, consolidating it and providing it as an easily accessible online resource. The PPG sits alongside the NPPF, supporting its aspirations and providing further guidance where necessary, including in relation to transport, health and wellbeing and ensuring the vitality of town centres.

LOCAL PLANNING POLICY AND GUIDANCE

Reading Borough Local Plan

- 7.20. The Reading Borough Local Plan was adopted in November 2019 and guides development in Reading up until 2036. The plan sets out policies for how planning applications will be decided.

Housing

- 7.21. The Local Plan outlines that provision will be made for an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036 as per **Policy H1** 'Housing Provision'. This is short of the need identified in the evidence base, as outlined in supporting paragraphs 4.4.2-4.44. **Policy H2** explains that appropriate density of residential development will be informed by, inter alia, the character and mix of uses in the area, the level of accessibility, the need to achieve high quality design and to maximise the efficiency of

land use. The policy highlights the need for residential development to contribute to meeting the needs of a mix of housing, in particular family homes. Figure 4.5 provides indicative density ranges for the town centre, noting these should be above 100 dwellings per hectare, albeit the policy is clear that the density should be informed by the criteria outlined in the policy and site-specific circumstances. Similarly, Policy CC6 outlines that the scale and density of development should be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.

- 7.22. **Policy RL1** confirms that Reading is the Regional Centre, and that vitality and viability of the centre should be maintained and enhanced. The inclusion of residential use on the upper floors is recognised as an improvement that would be supported within the town centre. The policy also notes that Central Reading will see the greatest levels of development and change.
- 7.23. **Policy H3** outlines the policy considerations relevant to affordable housing. Proposals for 10 or more dwellings will need to provide 30% affordable units on site in the first instance, with a financial contribution being acceptable where appropriate. In terms of priority needs for affordable homes, the policy outlines a priority for housing with 2 or more bedrooms.
- 7.24. **Policy CR6** outlines criteria that will be used for assessing residential development within Central Reading. A mix of 1, 2 and 3 bed units should be provided, and within developments of 15+ units a maximum of 40% of units should be 1-bed / studios, and a minimum of 5% of units should be at least 3-bed. An overconcentration of single person social rent units should also be avoided.

Residential Quality

- 7.25. **Policy H5** outlines the required standards new homes should be built to, including in relation to zero carbon homes, high water efficiency, and accessible housing. Homes within Central Reading are not required to meet nationally-described space standards.
- 7.26. All new homes are required to provide access to private or communal outdoor space in line with **Policy H10**. For flatted developments communal outdoor space, balconies and/or roof gardens may be appropriate. Green infrastructure, seating areas, and storage space are encouraged within the outdoor areas to enhance the

quality of these. Consideration needs to be given to siting in relation to entrances, safety, overlooking, overbearing or overshadowing.

Sustainability

- 7.27. **Policy CC2** 'Sustainable Design and Construction' sets out RBC requirements for new development to be sustainable in light of the climate change emergency. It states, "*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*".
- 7.28. **Policy CC3** requires new development to be designed to incorporate measures to adapt to climate change. Proposals should demonstrate how they have been designed to maximise resistance and resilience to climate change. Development should also minimise the impact of development on surface water runoff. Policy CC4, requires development of more than 20 homes to consider the inclusion of decentralised energy provision.
- 7.29. New developments are required to minimise waste during the construction, use and life phases of buildings. There must be useable, well-designed waste storage provision within developments as per **Policy CC5** 'Waste Minimisation and Storage'.

Design and Heritage

- 7.30. **Policy CR2** sets out specific design considerations for developments within Central Reading. They should provide frontages that engage with the street at lower levels, consider ways of providing green infrastructure, and use architectural details and materials that are of high quality. Proposals should also consider adjacent development sites.
- 7.31. **Policy CC7** 'Design and the Public Realm' involves all development proposals adhering to a high-quality design standard which maintains and enhances the character of the surroundings its set within. Components such as layout, landscape, density, scale and architectural details and material will need to make a positive contribution to the urban design objectives of: character, continuity and enclosure, quality of public realm, ease of movement and permeability, legibility, adaptability and diversity. Developments will also need to respond

positively to local context, including protecting and enhancing the historic environment, and create safe, secure, accessible and visually attractive environments.

7.32. Although the site is not locally of statutory listed, there are listed building within its setting. The site also lies within the Market Place / London Street Conservation Area. **Policy EN1** relates to the protection and enhancement of the historic environment. It states that: “... *proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits*”.

7.33. **Policy EN3** relates to the ‘Enhancement of Conservation Areas’. The special interest, character and architecture of Conservation Areas will need to be conserved and enhanced. Development within conservation areas must also make a positive contribution to local character and distinctiveness, with positive consideration given to proposals which take opportunities to enhance the character of conservation areas, for example via landscaping and architectural detailing. Protecting and promoting green spaces is also key. **Policy EN4** relating to Locally Important Heritage Assets requires their significance to be conserved.

7.34. **Policy EN6** outlines that “*in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will contribute to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:*

- a) *The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- b) *Sensitivity to historic context;*
- c) *Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g., patterned brickwork or former worker terraced housing);*

d) Whether development promotes and/or improves access to previously undiscovered or neglected historic significance”.

7.35. **Policy EN2** relates to Areas of Archaeological Significance. Applicants must identify these and where proposals have an adverse effect on these permission will not be granted, unless there is a clear justification and convincing justification in the form of overriding public benefits.

Amenity

7.36. Development proposals must not cause a detrimental impact on the living environment of existing residents or result in unacceptable living conditions for new residents, in terms of privacy, access to sunlight and daylight, overbearing impacts, outlook, noise and disturbance, lighting, dust and fumes, odour etc... in accordance with **Policy CC8** ‘Safeguarding Amenity’. It states: *“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.”*

7.37. The policy also covers the effect of traffic movement and operational hours of businesses on amenity.

7.38. Residential developments in Central Reading should demonstrate how noise disturbance from neighbouring land uses has been mitigated and minimised as per **Policy CR6**. Air quality implications of residential development should also be considered.

Transport

7.39. Development proposals should contribute to the aspirations of the Local Transport Plan as per **Policy TR1**. Sustainable travel should be promoted and improved, such as through appropriate provision for walking and cycling routes and Travel Plans

7.40. Suitable provision should be made for improved access to cycling, and cycle parking provision in line with **Policy TR4**. Car and cycle parking should be provided as appropriate to the accessibility of the site, with 10% of car parking spaces needing to provide electric vehicle charging points to meet the requirements of **Policy**

TR5.

Biodiversity and Environment

- 7.41. **Policy EN12** sets out that development proposals should not result in a net loss of biodiversity and should contribute to a net gain wherever possible.
- 7.42. Development proposals should have regard to the need to improve air quality and reduce effects of poor quality in accordance with **Policy EN15**. Noise, light, land and water pollution are also relevant as per the considerations outlined in **Policy EN16** 'Pollution and Water Resources' and Policy EN17 'Noise Generating Equipment'.
- 7.43. Flooding and Sustainable Drainage Systems are covered in **Policy EN18**. Development should be directed to areas with the lowest risk of flooding whilst considering the impact of climate change. All major developments must include a sustainable drainage system (SuDS) as appropriate.

Supplementary Planning Documents

- 7.44. The following SPDs are of relevance and have been considered in development the proposals.

Affordable Housing SPD

- 7.45. Provides additional guidance and advice for developers, including Housing Associations and other Registered Providers on the Council's approach to Affordable Housing provision. Sets out the criteria for Affordable Housing, including the thresholds and percentages applicable, as well as advice on viability and when commuted payments will be considered. With regards to tenure mix, it states that: *"In general, of the on-site affordable housing provided to comply with policy H3, the tenure split will be as follows: • Affordable rented accommodation at 'Reading affordable rent' levels – at least 62%; and • Affordable home ownership (shared ownership or another product) – maximum 38%."*

Revised Parking Standards and Design SPD

- 7.46. Sets out the Council's parking standards for new developments. Provides guidance on the levels of car parking, cycle parking, motorcycle parking, electric car parking and disabled parking that should be provide at new developments. The site is located in Zone 1 where the requirement is for 0.5 spaces per 1 and 2 bed flats, and 1 space per 3 bed flat. The guidance states that should a developer require fewer spaces than set out then there would need to be demonstration, to the Highway Authority's satisfaction, that there would be no detriment to highway safety as a result. The minimum standards for cycle parking are 0.5 spaces per 1 and 2 bed flats, and 1 space per 3 bed flat.

Sustainable Design and Construction SPD

- 7.47. This guidance provides further details on submission requirements for sustainability related documents for applicants and developers. It also provides guidance on matters such as energy efficiency, sustainable drainage systems, climate change adaption measures, waste reduction and decentralised energy and district heating.

Planning Obligations SPD

- 7.48. This guidance sets out the councils expected approach to seeking planning obligations along with an introduction of the Community Infrastructure Charging schedule. It states proposals will be assessed on a site-by-site basis, and covers topics such as highways/transport, education, leisure facilities, open space and green infrastructure, renewable energy, affordable housing and so on.

Employment, Skills and Training SPD

- 7.49. The employment, skills and training SPD was adopted by RBC in 2013. It sets out the obligations which will be sought from developers at the construction and end user phases of development to contribute towards a range of employment, skills and training measures. This guidance is produced to mitigate the impacts of development to ensure that local people can better access job opportunities arising from new development.

8. Planning Considerations (including Affordable Housing Statement)

8.1. This section of the planning statement assesses the application proposal against the planning policy framework for the site. Consideration is given to the principle of the proposed development and other planning issues arising from the development proposal including:

- Principle of Development
- Principle of Residential Development;
- Design and Heritage;
- Housing Mix;
- Affordable Housing Statement;
- Residential Quality;
- Impact on Amenity;
- Residential Density;
- Fire Safety;
- Transport (including parking);
- Energy and Sustainability;
- Flood Risk and Sustainable Drainage;
- Biodiversity and Ecology; and
- Planning Obligations.

PRINCIPLE OF DEVELOPMENT

8.2. The existing building of no special historic or architectural merit and is identified in the Council's Conservation Area Appraisal document as failing to respect the historic setting and having a negative impact on the townscape around it. The site is also allocated in the Local Plan for development, under Policy CR14e. The policy allocation does not specify whether the development should comprise demolition or retention of the existing building. During pre-application discussions, RBC Officers advised that proposals to retain/upgrade the existing building would need to demonstrate a very high level of design quality in order to overcome the negative visual impact of the existing building.

8.3. The retention of the existing building would present a more sustainable option than demolition and rebuild

approach, and this is recognised within the Local Plan which states that *“The beneficial restoration and reuse of buildings should generally be considered before demolition and redevelopment”*. In order to demonstrate the benefits of retention over demolition, at pre application advice stage Savills Earth carried out a Whole Life Carbon Assessment which considered the benefits of a rebuild vs refurbishment approach. This report is included at Appendix 1. The assessment concluded that a refurbishment approach would result in 20% less whole life carbon being released in comparison to a rebuild approach. This assessment was presented to RBC within the follow up pre-application meeting where Officers agreed this would *“align with the general meeting the challenges of climate principles set out in paragraph 152 of the NPPF, Policies CC2 (Sustainable Design and Construction) and CC5 (Waste Minimisation) of the Reading Local Plan and within the Council’s adopted Sustainable Design and Construction SPD.”*

- 8.4. Having regard to the above, the principle of development is considered to be acceptable and in accordance with the Reading Local Plan and NPPF policies.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

- 8.5. The principle of residential development has already been established on site having regard to the Prior Approval given to change the use of offices to residential (appeal ref: APP/E0345/W/21/3284108 and application ref: 210478). Support for a residential use on the site is also provided in the Local Plan allocation *“Policy CR14e 3-10 Market Place, Abbey Hall and Abbey Square”*. The principles outlined within the allocation include the provision of residential uses on upper floors. Furthermore, Policy RL1 confirms that residential use on upper floors is acceptable within Reading town centre, with the supporting text to Policy CR6 confirming that the centre of Reading is becoming ever more important as a residential location which is welcomed.
- 8.6. The additional 38 homes will contribute to the Council achieving its housing target as outlined in Policy H1 of the Local Plan which states the borough will aim to deliver 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. RBC raised no objection to the introduction of additional residential units. As such, the principle of residential development is considered to be wholly acceptable and compliant with the Local Plan.

DESIGN AND HERITAGE

Improvements to Facades of Existing Building

- 8.7. The proposals include significant improvement works to the front and rear façades of the existing building to enhance its appearance and setting within the conservation area and the nearby listed buildings. The façade fronting Market Place will be divided into 4 identifiable vertical elements which alternate in materials and colours to extenuate this. This responds more positively to the historical context of the burgage plots of the Victorian era, and results in the existing building appearing less bulky and dominant within the historic setting therefore enhancing and complementing the Market Square conservation area. The new façade and resulting enhancements to the Market place conservation area are not able to be implemented through the existing permitted applications at the site. These benefits are only able to be released through a new full planning application.
- 8.8. The existing concrete blocks that form the front elevation facing Market Square are not considered to be visually appealing, and negatively contribute to local heritage assets. This was agreed with Officers during pre-application discussions. The plans sensitively introduce a locally distinctive and contemporary aesthetic design whilst utilising the existing framework of the building to maintain the grain and contextual elements. The proposed limited palette of sympathetic materials creates a high quality building.
- 8.9. Façade amendments are also proposed to the rear fronting Abbey Square. Although this part of the site does not directly impact a conservation area, feedback from the pre-application discussions with RBC highlighted the opportunity to create a more visually appealing building to provide benefits to the public realm. The proposed design builds on the existing façade, which already resembles a collection of plot frontages, bringing a family of façade types together to create a new identity on the street.
- 8.10. Additionally, new gates incorporating artwork are proposed to the basement parking area in order to further enhance the rear façade and to provide references through the design of the proposals to the historic use of the site.

Upward Extensions

- 8.11. The proposals include roof extensions to parts of the building to create up to 6 storeys. The front elevation of

the building will be extended to create a larger 4th floor. The middle component of the existing building will be extended by 2 storeys, and the rear elevation fronting Abbey Square will be extended from 2 storeys to 5 storeys. All extensions provide additional residential floorspace.

- 8.12. The additional massing proposed is discrete and subordinate to the existing building. Setbacks are also proposed from the front façade facing Market Place to achieve this. As a result, views of the roof extensions from the Market Place / London Street Conservation Area will be very limited.
- 8.13. Additional massing to the side and rear of the existing building is restricted and is proposed having regard to the scale and height of existing buildings in the local context including One Forbury Square at 5/6 storey (with significant floor to ceiling heights) and Davidson House, both at 7 storeys, located to the rear of the site. The highest point of the proposed extensions relates to the height of Davidson House to the rear. The extensions have been respectful and subordinate to the prevailing scale and massing in the immediate context aligning with the goal of Policy CC7 relating to the 'Design and Public Realm' and Policy EN6.
- 8.14. Comments from the pre-application meetings with RBC, and the Design Review Panel have been fully considered. There were originally concerns related to the additional massing exacerbating the negative impact of the existing building and the massing not being reflective of the prevailing height raised within the first pre-application meeting. Amendments were made to address these concerns, with a reduction to the 4th and 5th floor massing, relocation of the proposed access stair and retention of the existing lift overrun. The 2nd pre-application comments from RBC and the DRP confirm that the proposed massing is subservient and is not unduly prominent as a result of these changes.
- 8.15. The recessed fifth storey of the building also benefits from different material compared with the proposed six and seventh storey extension. This helps distinguish this level of the building from the floors below and allows for greater visual subservience
- 8.16. This further confirms compliance with Policy CC7.
- 8.17. Careful consideration is being given to the evolution of the design having regard to the site's location within a conservation area and the adjacent and nearby listed buildings. The proposals have been through 2 rounds of

pre-application discussions with RBC, along with a presentation to the Design Review Panel to ensure the scheme enhances the quality of the building within its sensitive setting whilst also aligning with the aspirations of RBC.

- 8.18. The existing building is considered a negative contributor the character of the area based on the existing worn and unattractive current façade. The proposals entail making design changes to the façade to add quality to Market Place in terms of character and architectural design and make a positive contribution to the heritage assets and Conservation Area the site lies within.
- 8.19. The existing building is wide and dominant within the street scene. To break this up and create the illusion of narrower building blocks to reflect the former burgage plots, the building has been divided into 4 sections with different materials and colours. This verticality assists in reducing the dominance of the existing structure when viewed from Market Place and has a more appropriate relationship with the existing buildings within Market Place, as per the requirements of Policy CR2. This was agreed by RBC and the DRP during pre-application discussions.
- 8.20. The verticality of the windows is retained through the upward extensions, however the proportions of these reduce higher up the building. The 2nd pre-application written feedback concludes that RBC officers and Conservation and Urban Design Officer welcome this approach as it maintains the verticality of the façade reducing the dominance of the building within the Conservation Area. The design elements contribute to enhancing and making a positive contribution to the Conservation Area as per Policy EN3.
- 8.21. Policy EN4 'Locally Important Heritage Assets' states that development proposals that may affect important heritage assets '*demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset*'. The varying heights of the development reflect the historic context of the site and complement the character of the surrounding area more accurately than the existing building. The recessed fourth floor is visually subservient and enhances the visual interest of the roofscape, which is noted in the accompanying Heritage and Landscape report. Further, this report confirms that the proposal is a visual enhancement in comparison to the existing building, particularly as the proposed design breaks up the building into smaller plots through the clever use of different materiality and window heights.

8.22. The columns to the ground floor colonnade of the building are finished with a natural stone as this reflects the stone finish to the ground floor frontage of a number of listed buildings set around Market Place. This is in accordance with Policy EN1 which requires development proposals to maintain and enhance the setting of heritage assets.

8.23. The redesign of the façade will be sensitive to its surroundings and will be in keeping Market Place square. The materials used and finish will introduce a locally distinctive and contemporary aesthetic that provides an identity, contributing to the conservation area as required within the site allocation, and the relevant heritage policies. The emerging proposals will comprehensively improve and enhance the existing building which has a negative impact on the wider conservation area and other local heritage assets.

Landscaping

8.24. The proposals incorporate a variety of landscaping on the external areas of the buildings to create a sustainable living environment. The existing site is mainly hardstanding areas, therefore the implementation of planting on the roof terraces increases the urban greening of the building and softens its appearance making it more visually appealing. The inclusion of minimal furniture nestled between raised planters and multi-stem shrubs enhances the quality of the amenity space with examples of such shown in the Design and Access statement. Green roofs are also proposed which provide biodiversity benefits and assist in reducing urban heat gain and slowing watershed.

8.25. Landscaping enhancements are also proposed on the street level at the rear of the building fronting Abbey Square. These enhancements were introduced following feedback within the pre-application meetings to improve the existing bleak and unwelcoming access route here. A green corridor with shrubbery and planting will be implemented.

Heritage and Townscape Impact

8.26. The submitted Townscape and Visual Impact assessment considers the impact of the additional massing from 8 key views surrounding the site. The front view of the site from within Market Place clarifies that the existing building is prominent and detracts from the character of the conservation area. This viewpoint has a high significance due to the high levels of footfall in this area. The report concludes that the proposed changes to

the façade is 'moderate beneficial' and the changes are in keeping with the character of the conservation area. The differentiating window heights, materiality and rooflines contribute to the visual interest on the street scene.

8.27. The view of the site from Town Hall Square is also considered to be 'high' importance due to the value of heritages assets here and footfall. The Townscape and Visual Impact assessment notes that the long, monolithic block of grey concrete across the existing façade is uncharacteristic of the area. The proposed building from this viewpoint is considered to be a significant enhancement from the existing, and better responds to the immediate street scene and wider townscape. The remaining 6 viewpoints have been determined to have a beneficial, enhancing beneficial or neutral impact on the townscape value.

HOUSING MIX

Housing Mix

8.28. In accordance with Local Plan Policy CR6 the development will provide a mix of 1, 2 and 3 bedroom properties. The proposed housing mix is considered against the "guide" included within Policy CR6.

Unit Size	Persons	No. of Units	% of Mix	Policy CR6 Guide
1 Bedroom	1B 1P	11	42%	Maximum of 40%
	1B 2P	5		
2 Bedrooms	2B 3P	11	50%	n/a
	2B 4P	8		
3 Bedrooms	3B 4P	3	8%	Minimum of 5%

Housing Mix

8.29. The proposal provides 8% of units with 3 bedrooms, thus exceeding the guide suggested in the Policy. The proposed number of 1 bedroom properties is slightly above the guide suggested in the Policy. The housing mix is considered to be acceptable on balance for the following reasons:

- The slightly higher level of 3 bedroom homes;
- The Policy only suggests the mix parameters as a guide; and
- The proposal involves conversion of an existing building and upwards extensions which means that there are constraints associated with providing amenity and play space making it a less suitable development for families.

AFFORDABLE HOUSING STATEMENT

8.30. The proposals provide a policy compliant level of affordable housing. Policy H3 requires residential development of 10 units or more to provide 30% of the homes in affordable tenures. As such, 11 affordable flats are proposed, out of the 38 homes proposed in this application.

8.31. In terms of affordable housing mix, the following is proposed, and this acknowledges the priority needs confirmed in Policy H3 for 2-bedroom affordable homes and the need for family housing too, with 1 of the 3 bedroom homes allocated to the affordable tenure:

Unit Size	Persons	No. of Units	% of Mix
1 Bedroom	1B	2	18%
2 Bedrooms	2B	8	73%
3 Bedrooms	3B	1	9%

Affordable Housing Mix

8.32. The affordable housing provision will be secured by a s106 agreement.

Plans showing the location of the affordable homes are included at Appendix 2 of this Statement. All affordable

homes meet nationally described space standards. Affordable Rent homes are to be located on the ground floor. The Shared Ownership homes are proposed across the second and third floors. The affordable units on the ground floor can be accessed from 2 entrances on Abbey square. The Shared Ownership units will be accessed via the southern core on Abbey Square. 2 of the affordable units will be Part M4(3) compliant units.

- 8.33. 6 (55%) of the proposed homes will be provided in the Reading Affordable Rent tenure, and 5 (45%) in the Shared Ownership tenure.

RESIDENTIAL QUALITY

Space Standards and Accessibility

- 8.34. As the proposal is located inside the Reading 'Central Area', under Policy H5 'Standards for New Housing' achieving minimum space standards is not required; however, in order to provide high quality accommodation, the Applicant has designed the homes to meet and exceed the nationally-described space standards.
- 8.35. 3 homes have been designed to meet Building Regulations Part M4(3) (assessable homes) thus exceeding the requirements of Policy H5. The remainder of the homes have been designed to meet Building Regulations Part M4(2).

Private & Communal Amenity Space

- 8.36. In accordance with Policy H10, the new homes will be provided with access to high quality communal outdoor space including landscaped roof terrace on the fourth and fifth floor, and a landscaped amenity space at ground floor level. Eight of the homes will also have access to private outdoor amenity space in the form of terraces. There are also significant amounts of new communal outdoor amenity space is provided for the residents of the development to enjoy. The daylight and sunlight report prepared by T16 Design further confirms that all communal open spaces will receive ample sunlight confirming these spaces are not overshadowed.
- 8.37. The proposal includes provision for indoor communal amenity spaces. All homes will have access to the communal amenity areas located on the ground and fifth floor. This will provide 40sqm of additional amenity space for residents to benefit from.

Outlook, Overlooking and Privacy

8.38. The proposal has carefully considered the outlook, overlooking and privacy of all units within the scheme having regard existing and approved adjacent developments. The units and roof terraces of the upper floors will benefit from excellent views across Central Reading.

Daylight & Sunlight within the Homes

8.39. Internal daylight / sunlight testing has been undertaken on all proposed homes in order to assess internal daylight / sunlight having regard to BRE guidelines. The assessment carried out by T16 Design confirms that in respect of daylight and sunlight all homes meet and exceed the guidelines.

Noise

8.40. A noise impact assessment has been undertaken by Venta Acoustics Ltd, which has assessed any potential noise sources on the proposed units. The report concludes that with the implementation of the recommended building envelope's acoustic performance, performance, the noise impact on the proposed units will be acceptable.

Air Quality

8.41. In accordance with Policy EN15, development proposals "*should have regard to the need to improve air quality and reduce the effects of poor air quality*". An air quality assessment has been undertaken by AQA Limited to assess the impacts of the proposal on air pollution levels and to consider the suitability of the site for residential use. This concludes that:

- A detailed air quality assessment should not be necessary as the proposed development would have an insignificant effect on local air quality, having regard to the anticipated low traffic levels generated by the development. The implementation of the Travel Plan will also encourage residents to use sustainable travel modes.
- Based on the results of local air quality monitoring and the distance of residential receptors from road traffic emissions sources, air quality at the proposed development will be acceptable.

- The proposals therefore accord with the NPPF, and Local Plan.

IMPACT ON AMENITY

- 8.42. The proposals take into consideration the impact on surrounding occupiers and neighbours. The orientation of the building and proposed internal layouts protects neighbouring amenity from direct overlooking. As a result, none of the proposed dwellings and the outlook from these results in direct overlooking of adjacent premises. In addition to this, the proposed homes to the rear of the development fronting Abbey Square look onto the existing blank facade of Davidson House and the adjacent 11-12 Market Place.
- 8.43. There is a proposed external corridor between the ground floor units and the Jacksons Corner development to ensure there are no facing habitable room windows. This ensures the future occupants of both the Jacksons Corner development and this proposal are safeguarded in terms of privacy in line with Policy CC8.
- 8.44. In terms of daylight and sunlight, the accompanying report prepared by T16 Design similarly assesses the impact of the proposal on neighbouring properties. The report concludes that the impact of the proposal is acceptable and within the BRE guidance recommendations.

RESIDENTIAL DENSITY

- 8.45. Policy CC6 'Accessibility and The Intensity of Development' requires development to be of an appropriate scale and density having regard to a sites level of accessibility. It acknowledges that the densest and largest scale developments will take place in the most accessible locations. The site is located in a highly accessible area within Central Reading in the town centre, within walking distances of local amenity, services, employment opportunities and sustainable travel options. There are numerous bus stops along Market Place, with Reading train station in proximity providing connections to the wider area. Further, there are excellent walking and cycling opportunities locally, with a wide range of amenities accessible within the town centre.
- 8.46. The NPPF recognises the overwhelming need to accommodate and accelerate housing development and make more effective use of land in Section 11. The provision for increased density on site is justified and acknowledged within national policy, particularly in the form of upward extensions such as the current proposals.

8.47. The site is allocated for “*retail and related uses ground floor with residential and/or offices on upper floors, designed to enhance contribution of site to Conservation Area*” under Policy CR14e of RBC Local Plan. The allocation refers to 46 – 70 dwellings, plus related uses on the ground floor. Policy H2 and Paragraph 5.4.33 of the Local Plan confirm that the above dwelling capacity figures are indicative and intended as a guide, and the capacity of each site will depend on various factors, including the detailed design and layout. In accordance with Policy H2, the appropriate density should instead be informed by the character and mix of uses in the area in which the site is located, the housing mix, consideration of heritage and townscape, the accessibility of the site, the quality of design, the need to minimise environment and amenity impacts, and the need to maximise the efficiency of land use. In this regard, the assessment included within this chapter confirms that:

- The site is a highly accessible and sustainable location;
- The design approach ensures that the proposed updated extensions are of an appropriate scale and massing, and that the improvements to the appearance of the building will deliver high quality design and will enhance the conservation area and setting of the nearby listed building, resulting in no harm to heritage assets and views.
- The proposed housing mix is acceptable on balance.
- The proposals have been developed to minimise environmental and amenity impacts.

8.48. For the above reasons the density of the development is considered to be appropriate and in accordance with Policy CC6 and H2 of the Local Plan.

FIRE SAFETY

8.49. As per the Government's commitment to Planning Gateway One, BB7 have produced a Fire Strategy to accompany the application which outlines the fire safety considerations specific to the development. There is no planning policy relevant to fire safety within the local plan, however the proposals endeavour to ensure a high standard of fire safety. As such, the following fire safety systems are incorporated into the proposals:

- Fire hydrants provided within 90m to an entry point;
- Enhanced mechanical smoke ventilation system;
- Guidance on Smoke Control to common Escape Routes in Apartment Buildings;

- Mechanical Smoke Venting of Residential Lobbies and Fire Fighting Shafts; and
- Introduction of sprinklers.

TRANSPORT (INCLUDING PARKING)

8.50. The impact of the development in relation to the local highway network, public transport, cycling and the pedestrian environment has been fully considered within the Transport Statement, prepared by TPS Consulting, submitted in support of the application. The key conclusions are discussed in relation to the proposed development, below.

Parking

8.51. Policy TR5 'Car and Cycle Parking and Electric Vehicle Charging' notes that development should provide car and cycle parking that is appropriate to the accessibility of the site. The Revised Parking Standards and Design supplementary planning guidance notes that the application site is within the central core area, meaning there is a requirement for 20 parking spaces. The proposal conforms to this requirement by providing 20 residential parking spaces within the basement car parking area. 3 of the parking spaces will be disabled parking bays, this is in accordance with the Revised Parking Standards and Design SPD.

8.52. 10% of the parking spaces will be provided with an electric vehicle charging point in accordance with Policy TR5.

8.53. Cycle parking provision for 21 spaces is to be provided in the lower ground level through 2x secure cycle storage units. This is fully compliant with the cycle parking standards for residential developments within the Revised Parking Standards and Design SPD.

8.54. The cycle parking will be secure and fully equipped with lockable racks to ensure a sense of security for future occupants.

Trip Generation & Traffic Impact

8.55. TPS consulting have undertaken modelling to assess the potential trip generation arising by the development. The proposed homes are anticipated to generate 22 two-way person trips in the AM peak hour and 24 two-

way person trips in the PM peak hour. The modal split of these journeys has also been assessed, with people being most likely to walk, drive or take the train given the site's highly accessible location.

- 8.56. The low trip generation arising from the development, along with sustainable transport modes taking up most of the method of travel, means that there will be no detrimental impact on the local highway network in line with Policy TR3.

Access

- 8.57. The pedestrian access fronting Market Place will be enhanced to increase legibility for future residents.
- 8.58. A new pedestrian access is proposed to the rear of the building from Abbey Square. The new rear access is located amongst new landscaping. The new pedestrian access has been assessed against Policy CC7 within the local plan relating to the design of the public realm, following feedback from the pre-application engagement with RBC and the DRP.
- 8.59. A range of landscaping and higher quality materials will be used on the rear elevation fronting Abbey Square, enhancing legibility and the character of the area.
- 8.60. Site allocation CR14e refers to the possibility of a pedestrian link between Market Place and Forbury Square/Abbey Square. The Heritage assessment undertaken by Stephen Levrant Heritage Architecture confirms there was no historic link through the site. Furthermore, the possibility of providing a link was explored during the pre-application process and it was demonstrated that there would be challenges associated with providing a functional, legible, attractive and safe route having regard to the level changes between Market Place and Abbey Square (where there is a height difference of about 1 storey). It was therefore concluded that it is not possible to provide a route. Following pre-application discussions, Officers concluded that: *"an internal link through the building is unlikely to fully achieve the policy aspiration of creating a functional link between Market Place and Forbury Square/Abbey Square that would be attractive to a pedestrian. By its nature an internal link would very likely lack legibility, surveillance and would raise safety and security concerns for occupiers of the building. The submitted information also sets out that given the layout of the building, the most feasible connection through the building would exit on the Abbey Square side via the back of the Forbury*

Square car park which is not an attractive desire line and would necessitate passage via a series of narrow corridors. There is also a change in levels within the building between Market Place and Forbury Square/Abbey Square which further complicates the provision of an internal access”.

Promotion of Sustainable Travel

8.61. Although the site is already located in a highly sustainable area in terms of sustainable travel, there are other features that encourage this. Policy TR1 within the local plan highlights the importance of major developments to commit to implement measures to promote sustainable transport facilities. The Travel Plan prepared by TPS Consulting outlines how this will be done and demonstrates the proposals compliance with Policy TR1. The encouragement of sustainable transport will be done through:

- Promoting walking, cycling and public transport through promotional material outlining the benefits of this;
- Promote and encourage cycling by distributing or displaying promotional material which outlines its benefits through a variety of media;
- Provision of secure and ample cycle parking within the development for future occupants to use;
- Promotion of free cycle training available through Reading Borough Council Bikeability Scheme; and
- Promote car sharing and local car club, along with the inclusion of electric vehicle charging points.

ENERGY AND SUSTAINABILITY

8.62. Policy CC2 Sustainable Design and Construction sets out how new developments should consider how water, energy, materials and other resources are used efficiently with climate change at the forefront. Engagement with RBC has confirmed that as the proposals do not relate to conversion of the existing building to major residential development, BREEAM standards do not apply. However, the Sustainability statement sets out how the predicted water usage equates to 94.7l/person/day, below that required by Building Regulations Part G. Sustainable construction and encouraging responsible resources is also committed to.

8.63. In accordance with Policy H5 ‘Standards for New Housing’, an Energy and Sustainability Statement has been prepared by T16 Design to demonstrate that the proposals have been designed to meet environmental standards in accordance with policy requirements, including in relation to energy efficiency, renewable energy

and water efficiency.

- 8.64. A range of low and zero carbon technologies have been reviewed and their suitability assessed. Following this exercise, it has been established that the use of electric panel heaters along with Air Source Heat Pumps (ASHP) hot water cylinders are the most appropriate low carbon technology. PV Panels are also proposed on the roof to meet the required reduction emissions.
- 8.65. Policy H5 states that all major new build residential development should be designed to achieve zero carbon homes. The Energy Assessment prepared by T16 concludes that with the addition of zero carbon technologies, a site wide improvement of 60% is achieved resulting in the total remaining regulated emissions of 15 tonnes. Based on the development proposals being on top of an existing building, it is considered this reduction is suitable and policy compliant with Policy H5.
- 8.66. As per Policy CC3 'Adaption to Climate Change', passive design measures such as solar orientation, natural ventilation, dual aspect design, thermal mass, air tightness, and fenestration design are incorporated into the scheme. The implementation of greenery and landscaping throughout the site further assists with climate change mitigation in line with Policy CC3.
- 8.67. Policy CC4 relates to securing energy for the development through a decentralised energy source. The Energy Statement confirms that the site is not near any existing or proposed decentralised energy sources making this policy not achievable or practical.

FLOOD RISK AND SUSTAINABLE DRAINAGE

- 8.68. Policy EN18 encourages development to areas at the lowest risk of flooding. The application site lies within Flood Zones 1 (Environment Agency (EA) Flood Map for Planning), where there is the lowest chance of flooding. Civilistix have prepared a Flood Risk and Sustainable Drainage System Strategy. The report concludes that the existing and proposed uses both result in a low risk from fluvial, surface water, ground water, artificial and reservoir flooding.
- 8.69. In relation to sustainable drainage, Policy EN18 requires major development to incorporate this into the proposals. The existing impermeable area is 0.243ha, with the proposals utilising the existing surface water

drainage system to convey flows to the Thames Water Sewer located within Abbey Square. Additional measures are proposed to enhance drainage further, including:

- Green roofs;
- Permeable paving; and
- Green planters and rain gardens to increase interception and slowing runoff.

8.70. It is therefore considered the existing scenario, along with the enhancements satisfy Policy EN18 of the RBC Local Plan.

BIODIVERSITY AND ECOLOGY

8.71. Pre-application discussions concluded that the application needed to be accompanied with a pre-liminary ecological assessment, particularly as there were works to the roof which could impact bats. As per the goals of Policy EN12, the ecological report concludes that there is no evidence of bats within the roof of the building, therefore, there are no species to be protected.

8.72. Policy EN12 further requires development proposals to not result in a net loss of biodiversity. Although a 10% biodiversity net gain is not a legal requirement yet, the client wishes to be proactive in terms of the 2021 Environment Act. The existing biodiversity on site is limited due to hardstanding's and the physical building itself taking up the majority of the site boundary.

8.73. The accompanying Biodiversity Net Gain Assessment concludes a baseline biodiversity level of 0 due to the site being fully occupied by hard-standing and having no botanical habitats present. The following landscaping techniques proposed to increase the amount of biodiversity on site, including:

- Inclusion of planters; and
- Landscaped roof areas.

8.74. In summary the BNG assessment concludes with the addition of the above, there will be a net gain of 100% on site which exceed future requirements and the ambitions of the RBC local plan. This proposal will provide great ecological enhancement to a currently biodiversity free site contributing to the ambitions of Policy EN14.

PLANNING OBLIGATIONS

8.75. In accordance with Section 106 of the Town and Country Planning Act (1990, as amended), planning obligations can be used, where necessary to make the development acceptable, as part of the planning application process to address specific planning issues subject to compliance with the Community Infrastructure Levy (CIL) Regulations (2010) (as amended).

8.76. The Applicant confirms that they are willing to enter into a Section 106 Agreement with RBC. It is anticipated that the draft Heads of Terms could include the following:

- Affordable Housing;
- Carbon Offsetting Contribution;
- Travel Plan;
- Biodiversity and habitat management;

8.77. In addition, the development will also be liable for RBC CIL. CIL can be spent on local community infrastructure projects for example towards strategic Borough wide transport improvements, education facilities, public realm improvements, air quality monitoring, and the provision of wide area decentralised energy centres to name a few.

9. Conclusion

- 9.1. This Town Planning Statement has been prepared on behalf of Tene Living (Reading) Ltd. to support a full planning application for the proposals at Soane Point, Market Place, which include improvements to the existing building facades, upwards extensions and the delivery of 38 new homes. The proposals present an exciting opportunity to significantly improve and make better use of an existing building, located within a highly accessible location within Reading Town Centre. The Applicant has positively engaged with the Council, key stakeholders and the local community in developing a high-quality design approach which will enhance the character of the conservation area and setting of heritage assets.
- 9.2. The principle of development and residential use is wholly supported by the Local Plan, and material considerations, including: the poor appearance of the existing building; the fact that the building fails to respect the historic setting and its negative impact on local character and townscape; and the Prior Approvals which permit the conversion of the offices to residential use. The heritage design-led approach taken in developing the proposals has been informed by pre-application discussions with Council's officer, a presentation to the Design Review Panel and consultation with key stakeholders and the local community. This has resulted in a high-quality design approach which will enhance the character of the area, enhance the London Road Conservation Area and also the setting of the nearby listed buildings. The proposals will make efficient use of this highly accessible town centre site and will deliver much needed additional housing. The application demonstrates that the proposals will deliver high quality housing, including affordable housing, and that it will not result in unacceptable impacts to neighbouring amenity, the environment or in transportation terms. Instead, the proposals will deliver the following planning benefits:
- Delivery of 38 additional homes on a highly accessible and sustainable, previously developed, site in the town centre. This will include an acceptable mix of 1, 2 and 3 bedroom apartments, with a policy compliant level of affordable housing. The homes have been designed to a high quality, with access to internal and outdoor amenity spaces.
 - Significant improvements to the appearance of the building through the carefully considered façade improvements which have taken cues from the heritage of the site and locality. Such amendments are not able to be implemented under previously permitted applications at the site.

- Sustainable design measures including: energy efficient design and retention of existing building to lower carbon emissions, inclusion of Air Source Heat Pumps, water efficiency measures, solar panels, sustainable urban drainage measures and measures to promote sustainable travel behaviour including cycle parking provision, electric vehicle charging points and the implementation of a Travel Plan;
- Biodiversity improvements such as planters, landscaped roof area and the addition of tree planting on the lower floors; and
- Section 106 and CIL contributions.

9.3. The proposal has been assessed against the planning policy context and has been demonstrated to be in accordance with national and local planning policies and guidance. The presumption in favour of sustainable development set out in the NPPF therefore applies, it is therefore respectfully requested that planning permission is granted.

Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG



Appendix 1: Whole Life Carbon Assessment



Executive Summary



Savills Earth have been appointed by Tene Living to prepare a Whole Life Carbon Assessment to aid pre-application discussions regarding the proposed development of Soane Point, 3-10 Market Place in the town of Reading.

The client is seeking to develop the site to provide new housing, converted from an existing office building in the centre of Reading. The change of use of the existing office to residential use (93 homes) has already been approved via the Prior Approval process (with an alternative proposal for 144 homes subject to an appeal process). The current proposal consists of refurbishing the existing building, retaining the structure and core, some facades and providing new services. Proposals also include additional massing to the existing building through roof extensions.

This approach is consistent with good sustainable design practices (as recommended by the UK Green Building Council and nationally recognised London Energy Transformation Initiative), which seek to retain and reuse existing buildings, avoiding excessive emissions associated with the extraction, processing and transportation of construction materials.

The objective of this assessment is to compare the proposed embodied carbon emissions (associated with the use of construction materials and processes) and operational emissions (resulting from energy use in the building when operational) over the lifetime of the building. This combined analysis is known as a whole life carbon assessment.

A review of Reading Borough Council's planning policy has shown a clear preference for the retention and reuse of existing buildings. Given the considerable carbon emissions associated with the extraction, processing and transportation of construction materials, it's clear to see that the reuse and repurposing of existing building stock offers considerable environmental benefits over new build alternatives, particularly if the refurbishments are significant enough to insulate facades, replace windows and incorporate new, low carbon building systems.

In order to determine the difference in carbon emissions between the refurbishment and new build options, an outline whole life carbon assessment has been undertaken for the proposed development, accounting for the embodied carbon dioxide emissions associated with the main construction elements, and the operational carbon emissions calculated above, over a 60-year study period.

The FCBS Carbon tool and its accompanying material/component database were used to assess the whole life carbon for the project, in the absence of a detailed breakdown of the existing and proposed construction materials, although these will be further developed as the scheme progresses towards a planning submission.

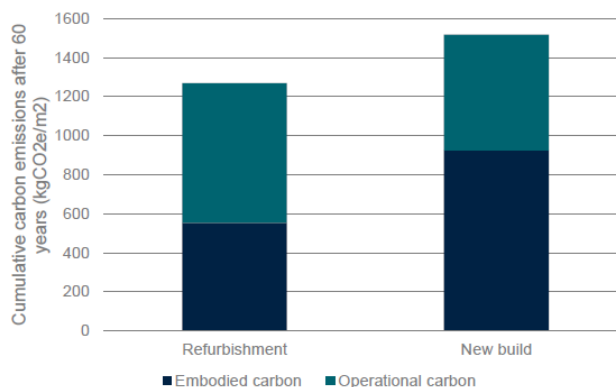
The table and graph to the right summarise the results of the assessment, and compares the embodied, operational and whole life carbon over a 60 year project timeframe for the new build and refurbishment options.

The data shows that the new build option has lower operational carbon emissions, due to the higher thermal efficiency of the new build envelope. However, the refurbishment option has a lower embodied carbon figure due to the retention of the structure and foundations. These make up the significant majority of the building's embodied carbon due to the high quantities of carbon dioxide taken to produce new concrete and steel reinforcement.

The assessment presented within this report demonstrates that, despite the refurbishment option having the potential for higher heating energy consumption due to the constraints of reusing an existing building, the whole life carbon emissions are still less than a new build alternative of the same shape and size as the current building. As the proposed additional massing will be new build this element has been excluded from the calculations.

The assessment contains a number of assumptions which should be confirmed during subsequent design stages, particularly relating to the thermal performance of the proposed façade and the building energy strategy, including the provision of low carbon heating systems and renewable energy technologies.

Carbon emissions after 60 years	Refurbishment (kgCO ₂ e/m ²)	New build (kgCO ₂ e/m ²)	% change
Embodied carbon	552	923	67%
Operational carbon	717	595	-17%
Whole life carbon	1,269	1,518	20%



1

Introduction

Introduction



Savills Earth have been appointed by Tene Living to prepare a Whole Life Carbon Assessment to aid pre-application discussions regarding emerging proposals for Soane Point, 3-10 Market Place in the town of Reading.

The client is seeking to redevelop the site to provide new housing, converted from an existing office building in the centre of Reading. The change of use of the existing office to residential use (93 homes) has already been approved via the Prior Approval process (with an alternative proposal for 144 homes subject to an appeal process). The current proposal consists of refurbishing the existing building, retaining the structure and core, some facades and providing new services. Proposals also include additional massing to the existing building through roof extensions.

This approach is consistent with good sustainable design practices (as recommended by the UK Green Building Council and nationally recognised London Energy Transformation Initiative), which seek to retain and reuse existing buildings, avoiding excessive emissions associated with the extraction, processing and transportation of construction materials.

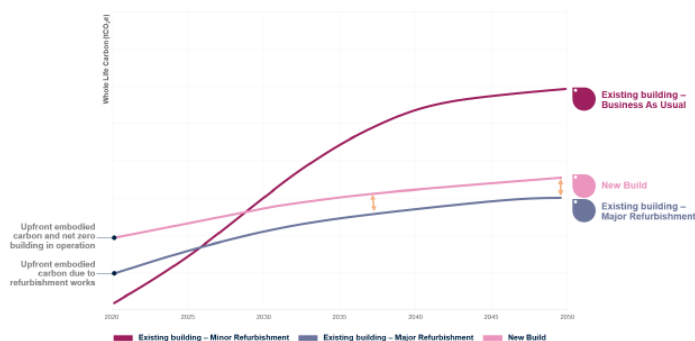
The objective of this assessment is to compare the proposed embodied carbon emissions (associated with the use of construction materials and processes) and operational emissions (resulting from energy use in the building when operational) over the lifetime of the building. This combined analysis is known as a whole life carbon assessment.

Traditionally, the operational emissions from new build projects would be lower than those from equivalent retrofit projects, due to the ability to implement improved building fabric standards and more efficient building systems. This would need to be balanced against the higher embodied carbon of building the entire substructure, superstructure, façade, finishes and systems from scratch.

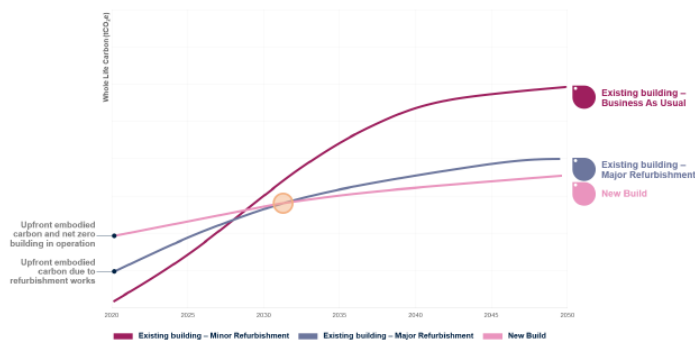
This comparison is illustrated in the figures to the right. On the upper graph, the emissions from the refurbishment project (blue line) are consistently below those of the new build project (pink line), meaning that the refurbishment has lower whole life carbon emissions than the new build equivalent. However, on the lower graph, the higher operational emissions from the refurbishment project mean that the lines cross after about 11 years of operation, demonstrating that the new build project will have lower whole life carbon emissions than the refurbishment alternative.

This assessment will combine both the embodied and operational emissions for the proposed refurbishment of Soane Point, and compare the whole life carbon emissions of a building refurbishment to a new build equivalent of the same size and shape.

Whole Life Cycle Carbon comparison – New build against refurbishment



Whole Life Cycle Carbon comparison – New build against refurbishment



2

Planning Policy Review

Planning Policy Review



Reading Borough Local Plan

Adopted November 2019

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

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.

To meet these requirements:

- All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;
- 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;
- All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.

CC3: ADAPTATION TO CLIMATE CHANGE

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;
- Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.

CC5: WASTE MINIMISATION AND STORAGE

Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.

4.1.23 Building materials and other non-renewable resources are being taken up at a rapid rate and increased re-use and recycling is essential in order to reduce waste and to manage future extraction and its impact on the environment. In light of this, and the need to reduce the amount of waste generated and to increase the proportion of waste that is reused or recycled through better waste management, it is considered necessary that a policy is in place that will achieve these aims. The beneficial restoration and reuse of buildings should generally be considered before demolition and redevelopment.

H5: STANDARDS FOR NEW HOUSING

New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable:

- All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.
- All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations.
- All major new-build residential development should be designed to achieve zero carbon homes.
- All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.
- All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).
- On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.

Planning Policy Review



Sustainable Design and Construction Supplementary Planning Document

Adopted December 2019

Measures that applicants should consider to achieve the requirements of policy CC5 could include:

Reducing waste during construction

- A Site Waste Management Plan (SWMP) should be developed at the pre-application stage to inform the adoption of good practice waste minimisation in design. The SWMP sets targets for waste reduction and recovery based on an assessment of the likely composition and quantity of waste arising and identification of the most significant cost-effective options for improvements. This should be supplemented by information on how the targets would be achieved during construction activities and how the actual levels of waste reduction and recovery would be monitored for comparison with the targets set.
- Re-use and refurbish buildings where possible and appropriate, rather than demolishing existing buildings and redeveloping them.
- Re-use building materials where possible. This is already often done when works are carried out to historic buildings to ensure materials match and the character and appearance is conserved. This can reduce the environmental impact of new development through a reduced demand for new materials and reduced levels of waste to be disposed of in landfill sites.
- Where demolition is appropriate, a strategy should be devised for the handling and re-use or disposal of demolition waste. This should include an audit of the materials present on site and an assessment as to the extent to which they could be put to use in the new development or in other developments elsewhere. By re-using demolition waste, the environmental impact of new development can be reduced and savings can be made on the costs of landfill.
- Developers should outline where they will be transporting waste to in order to ensure they are considering the most appropriate option and transporting waste the minimum journey possible.
- Developers should be encouraged to use recycled and secondary aggregates in construction, thereby reducing the demand for virgin material. This could help to secure a credit under the BREEAM standard.
- New building materials should not be over-ordered. Better communication between building professionals should be developed to ensure exact calculations of required materials are made to help ensure waste is prevented.
- Just-in-time delivery strategies can further reduce waste that is developed by improper storage and damage of materials. Materials that can be re-used or recycled need to be identified early on in the build process and segregated for easy storage, collection and transfer.

3

Methodology

Methodology



Whole Life Carbon Assessment

• Embodied Carbon

An outline whole life carbon assessment has been undertaken for the proposed development, accounting for the embodied carbon dioxide emissions associated with the main construction elements and the operational carbon emissions over a 60-year study period.

The FCBS Carbon tool and its accompanying material/component database were used to assess the whole life carbon for the project, in the absence of a detailed breakdown of the existing and proposed construction materials, although these will be further developed as the scheme progresses towards a planning submission.

In the UK, the framework for appraising the environmental impacts of the built environment is provided by BS EN 15978: 2011: (Sustainability of construction works — Assessment of environmental performance of buildings — Calculation method). It sets out the principles and calculation method for whole life assessment of the environmental impacts from built projects based on life-cycle assessment.

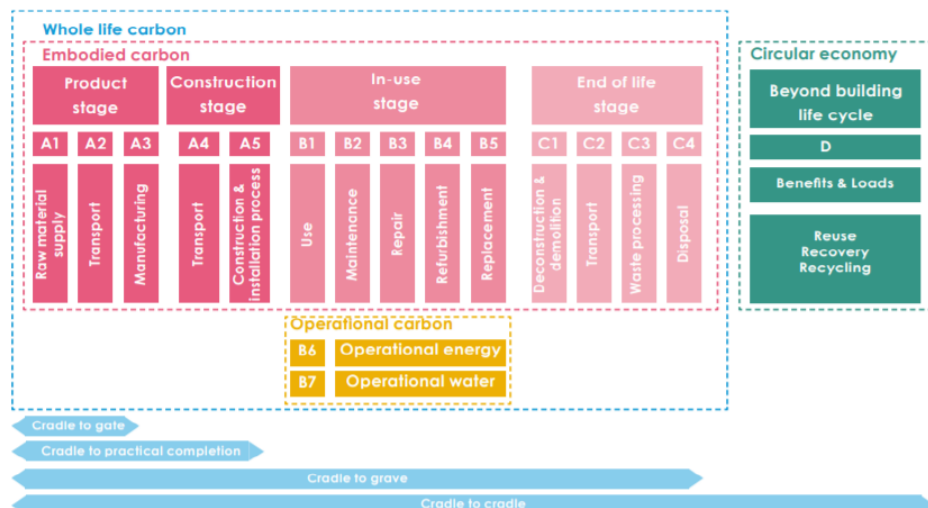
Underpinning BS EN 15978 is the RICS Professional Statement: Whole Life Carbon assessment for the built environment. The RICS PS serves as a guide to the practical implementation of the BS EN 15978 principles. It sets out technical details and calculation requirements.

BS EN 15978 and the RICS methodology set out four life-cycle modules which account for each stage in the life of a typical project:

- Module A1-A5: Product sourcing and construction phase
- Module B1-B7: Use stage
- Module C1- C4: End of life stage
- Module D: Benefit and loads beyond the system boundary

In order to assess the whole life carbon performance of the proposed refurbishment of Soane Point, a whole life carbon model of the proposed development has been produced.

The whole life carbon results have then been compared to an equivalent new build project, consisting of the same footprint and area, to compare the whole life carbon emissions between the two options.





Whole Life Carbon Assessment

- Operational carbon

In order to assess the operational carbon emission for modules B6 and B7, benchmark energy usage data for similar projects has been employed. The annual energy consumption for the various residential aspects of energy consumption within both the refurbishment and new build options were included in the whole life carbon model.

All energy usage was assumed to originate from electrical sources, due to the need for the scheme to decarbonise fuel sources in line with relevant national policy objectives.

Full details of the proposed energy strategy for the scheme, which will drive the operational carbon emissions, have not yet been developed. However, for the purposes of this assessment, the following fabric and systems standards have been assumed.

Fabric standards for new build and refurbishment options were assumed to be equivalent to those needed to meet the requirements of Building Regulations Part L 2021. However, the requirements for existing buildings in terms of U-values, are less onerous, due to the constraints of working with an existing building fabric. Additionally, air permeability and thermal bridging are both likely to be higher through an existing façade than through a new one. As a consequence of this, the heating consumption for a new build property will be lower than for the equivalent refurbishment property, and this has been reflected in the figures in the table to the right.

The consumption figures presented assume that the scheme will have a low carbon heating and hot water system, possibly driven by heat pump technology. It is also assumed that all internal lighting will be low energy LED fittings. Ventilation is assumed to be provided using mechanical ventilation with heat recovery units, with all cooking and appliances electrically powered. No renewable energy generation technology (such as PV panels or solar thermal hot water) have been included, although these could be added during subsequent design stages.

The current carbon intensity of the electricity grid has been used for the assessment, based on the UK SAP 10 carbon dioxide emissions factors adopted for Part L 2021.

Energy Usage	Refurbishment (kWh/m ² per annum)	New build (kWh/m ² per annum)
Heating	30.0	15.0
Hot water	13.0	13.0
Lighting	4.6	4.6
Fans and pumps	5.3	5.3
Cooking and appliances	35.0	35.0
TOTAL	87.9	72.9



Methodology



Whole Life Carbon Assessment

- Assumptions

Geometry for the assessment has been based on preliminary drawings issued by TP Bennett Architects. These have been translated into estimated material quantities by the FCBS Carbon toolkit.

The majority of material data (modules A1-A4) are averages taken from ICE V3 Nov 2019, with default specifications on strength classes/recycling rates aligned with the RICS Professional Statement on Whole life carbon assessment for the built environment. In cases where no value was available in the ICE database, EN15978 compliant Environmental Product Declarations have been used.

As exact products/specifications have not been finalised, the emissions resulting from the transport of building products from the manufacturers to site (module A4) have been estimated based on typical average transport distances within the FCBS toolkit.

Construction and installation process (module A5) have been estimated using the FCBS average based on the location and size of the development. The use, maintenance, and repair emissions (modules B1-B3) are predefined as a proportion of the product stage emissions (module A).

Indicative component lifespans for the various building elements assumed for the whole life carbon assessment are shown to the right, based on guidance from the RICS. This lifespan affects the refurbishment emissions for lifecycle module B4 and B5.

End of life emissions (module C) are predefined as a proportion of the product stage emissions (module A) to reflect the carbon required to dispose of the materials.

Post-deconstruction uses (module D) have not been included for either option assessed.

Building Part	Building element/component	Expected lifespan
Roof	Roof coverings	30 years
Structure	Foundations	60 years
	Floor slabs	60 years
	Columns	60 years
Finishes	Floor finishes	10 years
	Ceiling finishes	20 years
	Internal partitioning and dry lining	30 years
Services	All MEP	20 years
Facade	Glazed cladding and windows	35 years

4

Results



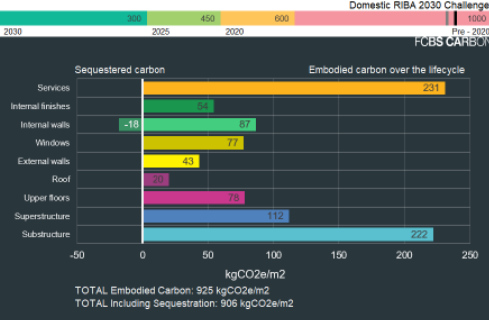
Results



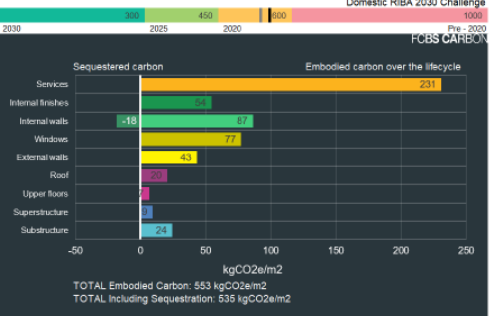
Lifecycle embodied carbon

A comparison of the lifecycle embodied carbon for the new build and refurbishment options is shown below.

New Build



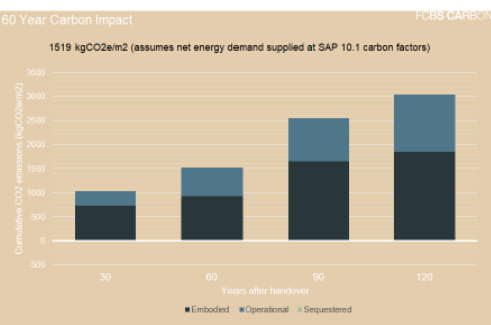
Refurbishment



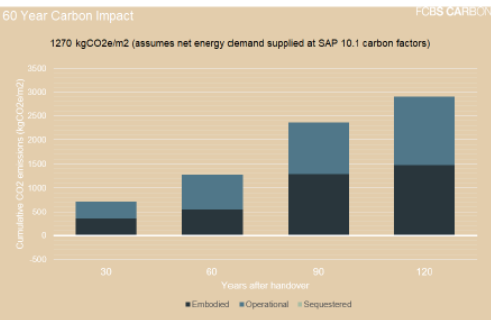
Whole life carbon

A comparison of the whole life carbon for the new build and refurbishment options is shown below.

New Build



Refurbishment





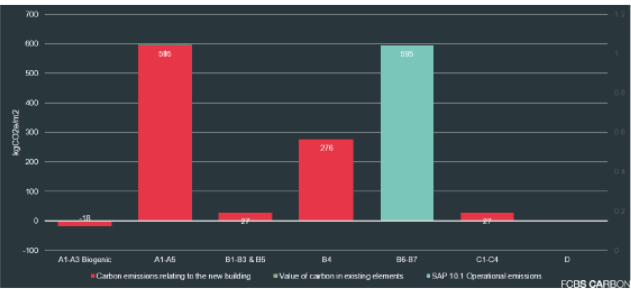
Results



Lifecycle carbon impact

A comparison of the lifecycle carbon impact over the various lifecycle stages for the new build and refurbishment options is shown below.

New Build



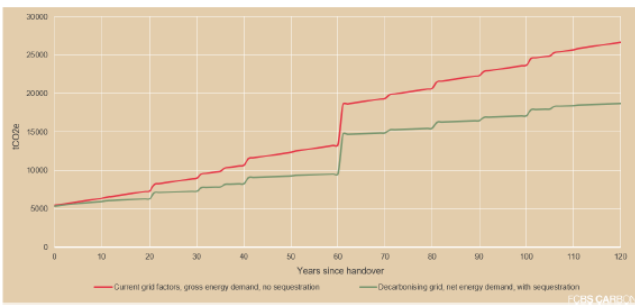
Refurbishment



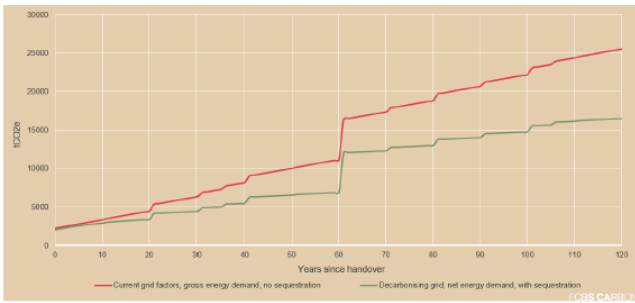
Whole life carbon impact

A comparison of the cumulative whole life carbon impact for the new build and refurbishment options is shown below.

New Build



Refurbishment



5

Analysis & Conclusions

Analysis & Conclusions



Analysis

The table and graph below summarise the results presented on the previous pages, and compare the embodied, operational and whole life carbon over a 60 year project timeframe for the new build and refurbishment options.

The data, and that presented on the previous pages, shows that the new build option has lower operational carbon emissions, due to the higher thermal efficiency of the new build envelope. However, the refurbishment option has a lower embodied carbon figure due to the retention of the structure and foundations. These make up the significant majority of the building's embodied carbon (as shown in the lifecycle embodied carbon graphs) due to the high quantities of carbon dioxide taken to produce new concrete and steel reinforcement.

The summation of the embodied and operational figures shows that, after a 60 year time period following completion (as recommended in the RICS methodology), the refurbishment option has lower whole life carbon emissions, with a figure 20% less than the new build equivalent.

The figures presented below assume an all-electric development which will not be reliant on fossil fuels to provide heating, hot water and cooking.

Thus, it is expected that over time, the operational emissions for both the new build and refurbishment options will fall further as the UK's electricity grid is decarbonised. The effect of this will be to increase the difference between the two options assessed, reducing the refurbishment option by a greater amount than the new build alternative. This reinforces the benefits of retaining the existing building.

However, given that the operational carbon figures have been assumed at this stage, and are based on previous project experience and industry good practice benchmarks, it is recommended that the operational energy consumption figures are updated once the energy strategy for the proposed scheme has been further progressed.

The assessment also makes assumptions on the materials and quantities contained within the existing building structure. Further investigation could refine these figures, but, given that inputs will be the same for both options, the refurbishment option is likely to consistently show a smaller embodied carbon figure. The figures presented for the new build option below do not include the carbon emissions associated with the demolition of the current building, which would also further increase the embodied carbon associated with this option.

Carbon emissions after 60 years	Refurbishment (kgCO ₂ e/m ²)	New build (kgCO ₂ e/m ²)	% change
Embodied carbon	552	923	67%
Operational carbon	717	595	-17%
Whole life carbon	1,269	1,518	20%

Conclusions

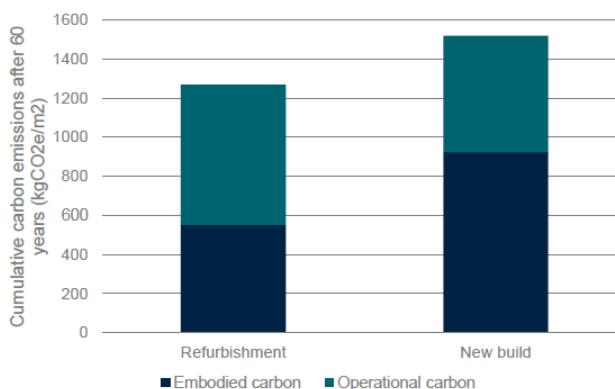
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The assessment presented within this report demonstrates that, despite the refurbishment option having the potential for higher heating energy consumption due to the constraints of

reusing an existing building, the whole life carbon emissions are still less than a new build alternative of the same shape and size as the current building.

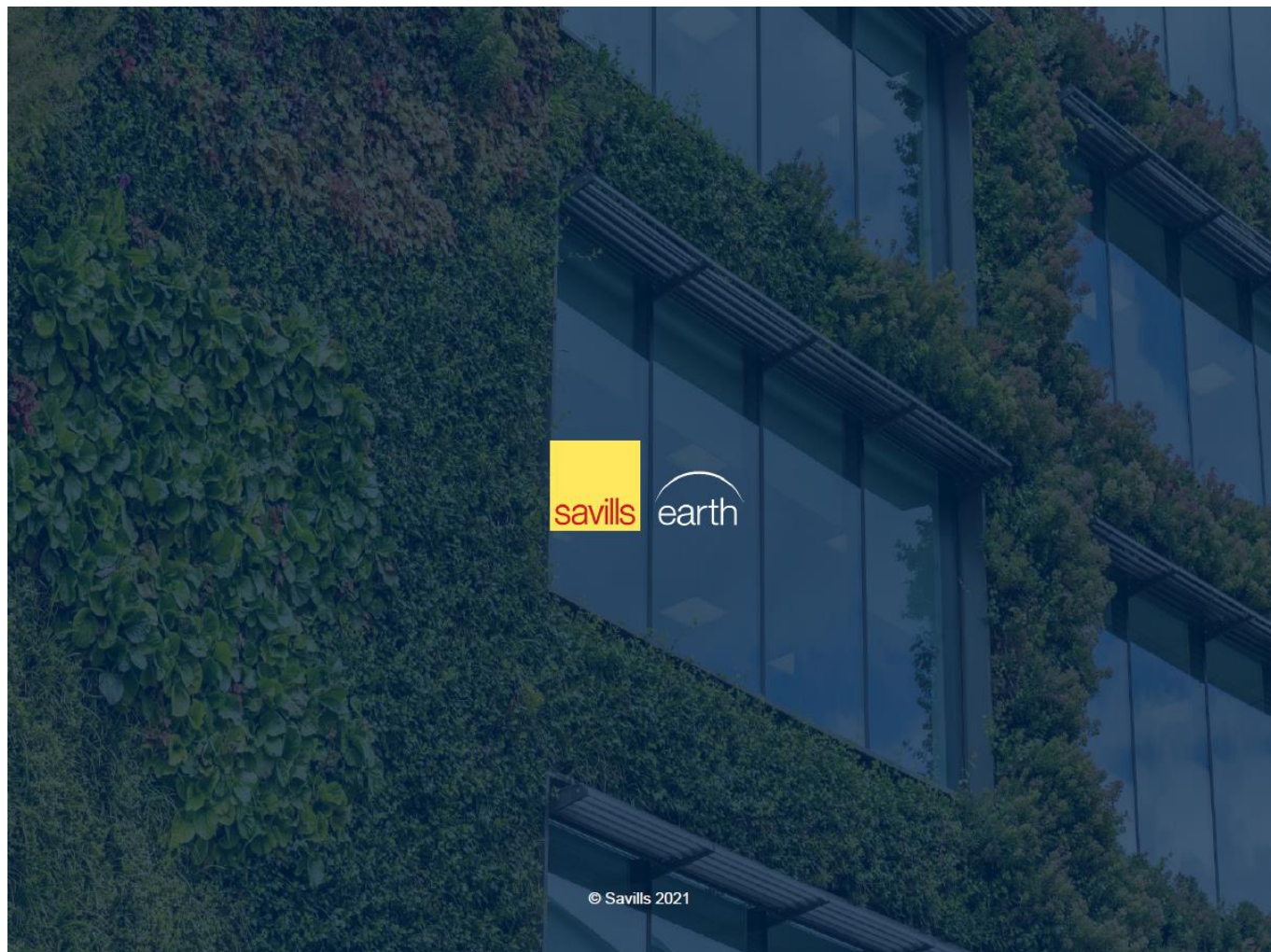
The assessment contains a number of assumptions which should be confirmed during subsequent design stages, particularly relating to the thermal performance of the proposed facade and the building energy strategy, including the provision of low carbon heating systems and renewable energy technologies.

It is also advised that, during further design stages, additional investigation and assessment of low carbon construction materials is undertaken to ensure the embodied emissions of the proposed development are minimised in accordance with industry best practice.



Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG



Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG



Appendix 2: Affordable Housing Plans

Proposed Ground Floor:



Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG



Proposed 2nd Floor:



Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG



Proposed 3rd Floor:



Town Planning Statement

Soane Point, 3-10 Market Place, Reading, RG1 2EG

