

**35-39 Friar Street, Reading,
RG1 1DX**

**Planning Statement (including
affordable housing and open
space matters)**

Shaviram Group

June 2022

LICHFIELDS



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1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of Shaviram Merchants Ltd, a subsidiary of the Shaviram Group (the applicant). It accompanies a planning application seeking full planning permission for new development proposals at 35-39 Friar Street, Reading, RG1 1DX.

1.2 Specifically, this planning application seeks:

“Demolition of existing buildings and installation of basement and erection of part 7, part 11 storey mixed use building comprising 103 upper floor residential units (Class C3) and Class E uses at part basement, part ground floor and Class E(g)(i) at part first floor level plus landscaping and other works”.

Scope of Application and Report

1.3 In addition to this Statement (which includes consideration of affordable housing and open space matters) the planning application is accompanied by the following information:

- 1 Cover letter, prepared by Lichfields;
- 2 Planning Application Forms and Certificates, prepared by Lichfields;
- 3 CIL Form, prepared by Lichfields;
- 4 Planning and Landscaping Drawings, prepared by Stefan Shaw Studios;
- 5 Design and Access Statement, prepared by Stefan Shaw Studios;
- 6 Air Quality Assessment, prepared by GEM;
- 7 Archaeological Desk Based Assessment, prepared by RPS Group;
- 8 BREAAAM Pre-Assessment, prepared by CPW;
- 9 Daylight/Sunlight Assessment, prepared by Delva Patman Redler;
- 10 Ecological Survey, prepared by Greengage;
- 11 Energy Statement, prepared by CPW;
- 12 Fire Statement, prepared by Jensen Hughes;
- 13 Flood Risk Assessment and Drainage Statement (including SUDS), prepared by JM Enviro;
- 14 Townscape and Heritage Visual Impact Assessment, prepared by KM Heritage;
- 15 Levels Survey Information, prepared by MK BIM Solutions;
- 16 Environmental Noise Survey and Acoustic Design Statement Report, prepared by Hann Tucker;
- 17 Phase 1 Desktop Study, prepared by Lustre;
- 18 Statement of Community Involvement, prepared by Cratus;
- 19 Sustainable Design and Construction Statement, prepared by CPW;
- 20 Transport Assessment and Travel Plan, prepared by Evoke;
- 21 Utilities Statement, prepared by CPW; and
- 22 Wind/Microclimate Assessment, prepared by RWDI.

1.4 The scope of the planning application submission has been agreed through the pre-application process.

- 1.5 This Statement draws on the above documents and materials and comprises the following:
- Section 2 identifies the key background information for the application site, its surrounding area and relevant planning history;
 - Section 3 details the proposed development;
 - Section 4 sets out the national and development plan policy of relevance to the proposed development;
 - Section 5 addresses the planning principles and policy context; and
 - Section 6 provides our concluding comments.

Pre-Application Consultation

- 1.6 This statement follows pre-application consultation with Reading Borough Council (RBC) as well as other consultees and stakeholders and the public.

Pre-Application Liaison with RBC

- 1.7 A pre-application scoping meeting was held 12 May 2021 (ref: 210580/PREAPP). A virtual pre-application meeting was subsequently held with the Council as well as the Shaviram Group, Lichfields and Stefan Shaw Studios on 26 May 2021.
- 1.8 RBC's initial Officer response was issued on 17 June 2021. This noted that:
- The mix of uses would be acceptable within this location and would comply with the overall strategy for Central Reading;
 - Any scheme should seek to work alongside the Station Hill sites, and the associated public realm / new 'Friar's Walk' – although it was recognised that this land falls outside the applicants ownership (and would fall outside the application boundary);
 - Requested a wind/ microclimate assessment accompany any future application proposals over 8 storeys;
 - A largely car free scheme, save for disabled spaces is acceptable in this highly accessible location; and
 - Suggested that the overall height needed to be lowered and the mass broken up further.

Design Review Panel

- 1.9 The scheme was presented to the Berkshire Design Review Panel on 10 September 2021. The feedback was subsequently issued on 28 September 2021. In summary it:
- Requested a heritage, townscape and visual impact assessment be undertaken in parallel with the design process and use its outputs to drive the design principles;
 - Suggested lowering the proposed heights so they were no taller than Station Hill Plot E;
 - Noted the need to ensure the angles proposed translate to useable interior spaces;
 - Asked that the relationship between the street, super-lobby, corridors and cores be explained;
 - Suggested reworking the façade treatment and ensuring the treatment is unified.
- 1.10 A follow up review was undertaken on 24 November 2021 and the feedback was subsequently issued on 9 December 2021. In summary, it:
- Noted that the design has developed positively since the last review and suggested a few further refinements to the massing and architectural treatment;

- Suggested that environmental concerns, energy requirements and daylight and sunlight analysis feeds into design development; and
- Noted the importance of the landscape strategy being developed in relation to biodiversity and ecology requirements.

Liaison with Other Consultees

- 1.11 In March 2022 the applicant undertook a public consultation process with the local community. This process is summarised below and expanded upon in the Statement of Community Involvement (SCI) prepared by Cratus which accompanies the application submission.
- 1.12 As set out in the SCI a consultation leaflet was mailed to 2,016 addresses within an identified consultation zone on 21 February 2022. This leaflet introduced the proposals and provided details of the project team for feedback.
- 1.13 A bespoke website (www.friarstreetconsultation.co.uk) was created to enable residents to learn more about the proposals, submit feedback and register for the webinar.
- 1.14 A webinar took place on 3 March 2022. The event provided details of the proposed development, introduced by the applicants and design team, and summarised the work done so far in developing the emerging proposals. In total six visitors attended the virtual event and comments were made in respect of the proposed affordable housing provision, mix/ tenure, the height of the proposals and the parking provision.
- 1.15 A meeting with Abbey ward councillors also took place on 10 March 2022. Comments were made related to the design, housing mix, car park, sustainability and public realm enhancements.

Applicant's Response

- 1.16 In direct response to the pre-application feedback received:
- A wind/ microclimate assessment has been undertaken and accompanies this application;
 - The proposed overall height has been reduced from 14 storeys to 11 storeys;
 - A Heritage, Townscape and Visual Impact Assessment was undertaken in parallel with the design evolution following the design review panel and thus has been used to drive the design principles;
 - Policy compliant affordable housing is provided as part of the proposed development;
 - The scheme makes a positive contribution to the public realm enhancing the north south route along Friar's Walk; and
 - Cosmos is being retained and so will occupy the new development and will not be lost from Friar Street.

Summary

- 1.17 In summary, this application is the product of a lengthy constructive dialogue with the Council, design review panel and other consultees and stakeholders and the applicant has sought to address all the comments raised, where appropriate.

2.0 Key Background Information

- 2.1 The purpose of this section is to describe the application site and surrounding area, as well as a review of the relevant planning history. It should be read in conjunction with the accompanying Design and Access Statement (DAS) and other material accompanying the planning application..

Application Site

- 2.2 The site is situated on Friar Street in Reading town centre. Friar Street consists primarily of retail and leisure uses at ground floor with offices and residential uses above. Friar Street runs east to west connecting the IDR in the west to Reading Town Hall and Museum to the east. To the north is the railways station with Broad Street Mall to the south and the Oracle to the south east. Building heights vary being generally between 3 to 6 storeys with the exception of the Novotel which rises to 13 storeys.
- 2.3 The Reading Borough Local Plan (RBLP) (adopted November 2019) is accompanied by a proposals Map which identifies the site as falling within the Reading Central Area and office core (CR1) and the Station/ River Major Opportunity Area (CR11) where the site specifically falls within the wider Friar Street and Station Road sub area (CR11a) (in total this sub area comprises 1.36 ha) within which the Council seeks:

“...active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. Listed buildings and their settings in the area will be conserved, and opportunities to improve the environment of Merchants Place will be sought”.

- 2.4 Overall, the indicative potential for the wider sub area is stated (RBLP, pg. 146) as 150-270 dwellings, offices, retail and leisure (with no significant net gain assumed).
- 2.5 The proposals map also identifies the site as being in an Air Quality Management Area (EN15) and Area of Archaeological Potential (EN2). The site falls just outside the Station Area Tall Building Cluster.

Site Planning History

- 2.6 The online planning register identifies a number of planning / other applications at the site (as summarised in Table 2.1 overleaf). In summary, there appear to have been a number of applications for 35-38 Friar Street which have sought to change/ redevelop the site including:
- A prior approval application approved on 4 April 2016 for the change of use of 1st to 3rd floor (with ground floor entrance and plant room at basement) from Class B1(a) (offices) to C3 (dwelling houses) to comprise of 25 flats (15 studios, 6 x 1 bedroom and 4 x 2 bedrooms); and
 - A planning application that was approved 11 February 2009 for the demolition of existing four storey building (Class A1 retail use on ground floor and Class B1 office use on upper floors) and erection of a seven storey building with Class A1/A2/A3 use on ground floor, Class D2 leisure in basement, and 83 Class C1 hotel use serviced apartments on the upper floors.
- 2.7 At no 39 Friar Street there have also been a number of applications including:
- Retrospective permission was granted on 5 May 2016 for change of use of ground floor premises from amusement arcade (sui generis) to gymnasium (class D2); and

- Planning permission was granted for the change of use from Building Society Office (A2) to an amusement Centre on 12 January 2000.

2.8

In addition to the above, there have been a series of minor works applications at both sites.

Table 2.1 35-39 Friar Street Planning History

Application Ref	Description of development	Status
160232	Change of use of 1st to 3rd floor (with ground floor entrance and plant room at basement) from Class B1(a)(offices) to C3 (dwelling houses) to comprise of 25 flats (15 studios, 6 x 1 bedroom and 4 x 2 bedrooms). Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015	Prior approval given on 4 April 2016
120179	Discharge of conditions of planning permission 10/00173/FUL	Part discharge on 1 May 2012
111724	1 fascia sign and 1 projecting sign	Planning permission granted on 15 November 2011
110417	Construction of new shop front	Planning permission granted on 15 November 2011
100304	Change of use from A1 to A3; new steel framed and clad extension over existing flat roof; new extract ducts	Planning permission granted on 22 April 2010
090008	Change of use of ground floor and basement from A1 (retail) to A3 (restaurant)	Planning permission granted on 2 July 2009
070001	Demolition of existing four storey building (Class A1 retail use on ground floor and Class B1 office use on upper floors) and erection of a seven storey building with Class A1/A2/A3 use on ground floor, Class D2 leisure in basement, and 83 Class C1 hotel use serviced apartments on the upper floors	Planning permission granted on 11 February 2009
992278	Alterations to entrance to offices	Decided 10 January 2000
992049	Change of use of ground floor and basement from A1 to D1 (dental care)	Decided 26 May 1999
960715	Renewal of planning consent 91/0404/FD - Erection of concrete platform over rear yard & use of roof space to create 12 car parking spaces, access ramp and creation of access from adj car park, alterations to fire escape arrangements.	Decided 18 September 1997
910568	Erection of concrete platform over rear yard & use of roof space to create 12 car parking spaces, access ramp and creation of access from adj car park, alts to fire escape arrangements	Decided 14 June 1991
910569	Erection of concrete platform over rear yard & use of roof space to create 19 car parking spaces, access ramp and creation of access from adj car park, alts to fire escape arrangements.	Decided 14 June 1991
900085	Change of use of existing roofspace to private car park, Erection of new escape stairs.	Decided 14 November 1990

Source: RBC Online Planning Register

De-listing of 39 Friar Street

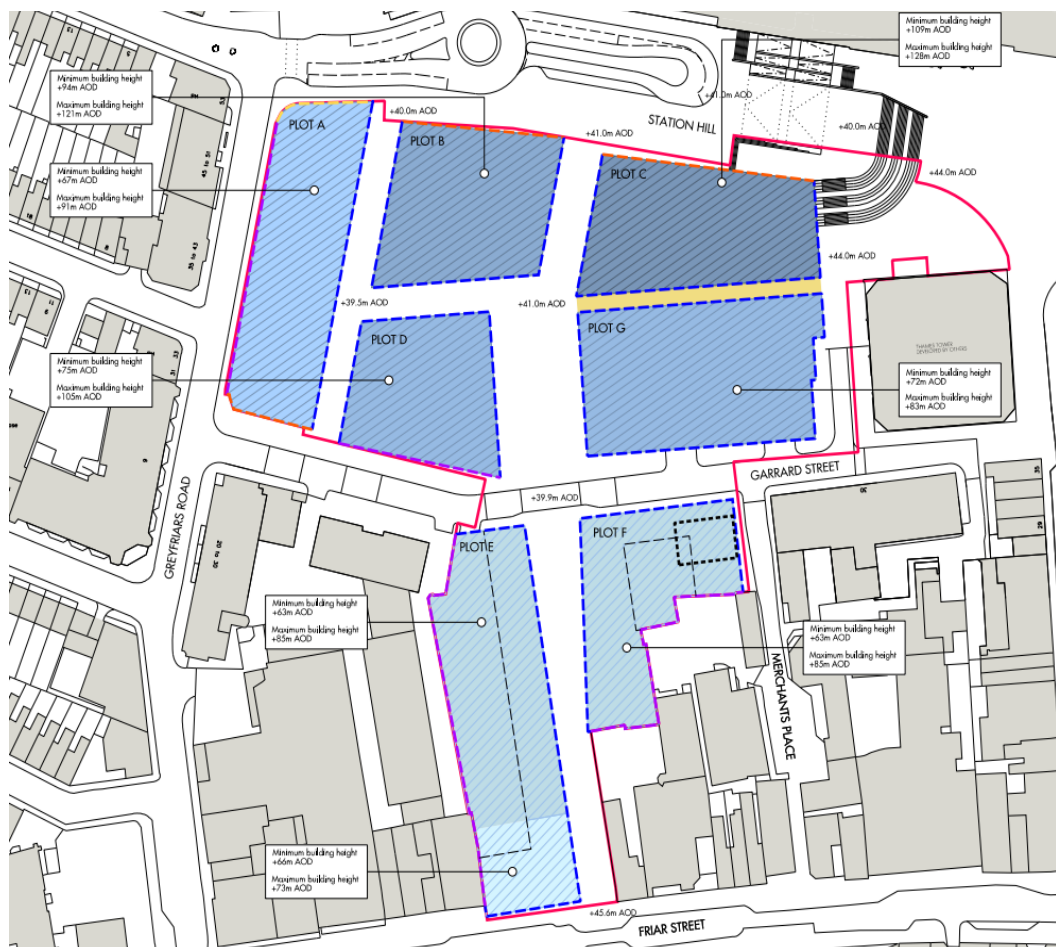
- 2.9 No. 39 Friar Street was de-listed a few years ago. The reason for this is set out in the Historic England Advice Report (dated 15 January 2018) as being:

“After examining all available records and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are no longer fulfilled. It is recommended therefore that 39 Friar Street, Reading be removed from the list”.

Surrounding Area Planning History

- 2.10 Immediately adjacent the site to the west is the site of the former Friar’s Walk shopping centre which was constructed in the 1970s which has now been demolished as it forms the southern part of the Station Hill Development.
- 2.11 The Station Hill masterplan site has been subject to a number of planning applications and permissions over recent years. These include Outline Planning Permission (Ref. 130436) (the 2015 OPP) which was granted by RBC on 9 January 2015 and permitted a mixed use redevelopment of the site including the demolition and alteration of existing buildings and erection of new buildings and structures to provide Offices (Use Class B1), a range of town centre uses including retail and related uses (Use Class A1- A5) leisure (Use Class D2) and residential units, associated infrastructure, public realm works and ancillary development. This permission reserved all matters.
- 2.12 Of most relevance to the site under this OPP is the new pedestrian link proposed ‘Friars Walk’ which was proposed to connect Friar Street to the new commercial district and station, as well as the new Station Hill buildings proposed to be situated immediately adjacent to the site (Plot E) and to the rear (Plot F) of the site.
- 2.13 The OPP parameter plans identify the building heights for Plots E and F (Figure 2.1). Building heights vary between a minimum of +63 m and a maximum of +85m AOD at the northern end of Plot E and a minimum of +66m AOD and a maximum +73m AOD at the southern end. Plot F has a minimum building height of +63 AOD and a maximum of +85m AOD.

Figure 2.1 Parameter Plan 3: Building Plot Parameters (including height)



Source: Drawing no. 698_PP_07_003 included in Station Hill Parameter Plans Document (March 2013) [accessed via RBC online register on 10.03.21]

- 2.14 Since the original OPP there have been a number of subsequent applications/ variations, including a non-material amendment (Ref. 191983) to the approval of reserved matters 190465 (Plot E Station Hill) and a non-material amendment (Ref. 191984) to approval of reserved matters 190466 (Plot F Station Hill) both of which were approved on 15 June 2020). We understand that neither of these NMA's amend the proposed heights.
- 2.15 The following reserved matters applications were submitted for Plots E and F on 02 November 2020:
- Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) and submission of details (Conditions 12, 13, 15, 16, 17,18, 19, 20, 21, 22, and 52) for Plot F (Ref. 201533) submitted pursuant to the Outline Planning Application ref. 201536/VAR. The proposals comprise the construction of a ground plus 12 storey building comprising 184 Build to Rent residential units, 762 sqm (GEA) of flexible retail, leisure and business floorspace (Use Class E, Sui Generis, F.1 and F.2), cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works. This was approved on 23 July 2021.
 - Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) and submission of details (Conditions 12, 13, 15, 16, 17, 18, 30, 34 and 62(i)) for Plot E (Ref. 201537) submitted pursuant to the Outline Planning Application ref. 201532/VAR. The proposals comprise the construction of a 12 storey building, plus

basement storey, comprising 415 Build to Rent residential units, 722 sqm (GEA) of flexible commercial and leisure (Use Class E (a),(b) (c),(d),(e), (f), (g)(i), and (g)(ii), Use Class F.1 and Use Class F.2); the following sui generis uses: Drinking establishments; Hot food. This was approved on 23 July 2021.

- 2.16 Other recent relevant planning applications in the surrounding area include the planning application at Broad Street Mall (Ref. 182137/FUL) which received a resolution to grant on 4 March 2020 for:

Construction of three residential buildings (Use Class C3) ranging in height from 5 to 20 storeys above Broad Street Mall (Site E to provide 42 units, Site B to provide up to 134 Units and Site A to provide up to 148 units) and provision of a podium level amenity area, Construction of a 16 storey building on South Court comprising ground and first floor retail(Use Class A1/A2/A3) and residential over upper floors (Use Class C3, Site C to provide up to 98 units), Creation of ground floor retail units (Use Class A1/A3/A4) fronting Dusseldorf Way and ground floor retail (Use Class A1/A2/A3) fronting Queens Walk, all necessary enabling and alteration works required

3.0 **Proposed Development**

- 3.1 A summary of the application proposals is provided below and further details can be found on the accompanying application drawings and in the DAS, prepared by Stefan Shaw Studios.

Land Use

- 3.2 The proposed development comprises 103 no. dwellings (Class C3) and 1,818 sqm floorspace of Class E (retail / food and drink) and Class E(g)(i) (co-working).

Dwelling Mix

- 3.3 The proposed dwelling mix comprises:

- 19 no 1 bed 1 person
- 22 no 1 bed 2 person
- 23 no 2 bed 3 person
- 33 no 2 bed 4 person
- 6 no 3 bed 5 person

- 3.4 All have been designed to the Build to Rent model.

- 3.5 10% of these apartments are designed to be adaptable for wheelchair users.

- 3.6 Out of the 103 proposed homes 30% (31) will be affordable apartments, reflecting the provisions of Local Plan policy H4..

Class E

- 3.7 The proposed class E uses comprises:

- Retail and restaurant – 1669 sqm (GIA); and
- Co-Workspace – 149 sqm (GIA).

Layout and Scale

- 3.8 The proposed development comprises a basement, ground plus 10 storey mixed use scheme with 1,818 sqm retail/ food and drink across the ground and lower ground floors, a 149 sqm co-working space at the first floor and 103 residential dwellings on the upper floors along with communal rooftop terraces.
- 3.9 A service area, ancillary plant, additional commercial space, cycle and refuse stores are provided within the basement.

Access

By Foot and Bicycle

- 3.10 Pedestrian access to the residential and retail units will be taken from the newly created Friars Walk public realm with both lifts and stairs provided to each floor for residents.

- 3.11 The proposed cycle parking will be located at basement level with access taken either from the aforementioned ramp (to and from Merchants Place) or from the public realm, where the proposed lifts continue to and from basement level.

3.12 Cycle parking comprises:

- Retail - 2 long stay cycle parking spaces in the basement in a standalone secure, sheltered cycle parking room.
- Restaurant - 13 cycle parking spaces in the basement in a standalone secure, sheltered cycle parking room.
- Co-Workspace – no dedicated cycle spaces.
- Residential - 93 cycle parking bays. These will be provided at basement level with 45 two-tier stands (90 spaces) together with three adapted cycle parking bays.

By Car

3.13 Vehicular access to the disabled parking proposed within the development is proposed to the rear of the site from Merchants Place, utilising the existing gated traffic light controlled access. Vehicles will route through the existing car park to the rear of the site, which is under the ownership of the Applicant who has rights of access. Access to the disabled parking bays will be provided via a proposed ramp to basement level. The ramp measures 2.75m in width with a flush 1.2m wide footway on the western side. The entrance to the ramp will be traffic light controlled with priority given to exiting vehicles over inbound vehicles. Given that the ramp only provides access to four disabled bays the probability of a car needing to enter at the same time as a car needing to exit is minimal. Nonetheless the traffic signal controlled ramp will ensure all movements can access and egress the ramp safely.

3.14 The proposed development will be car-free with the exception of four disabled parking spaces provided within the basement.

Amenity Space

3.15 The proposed development comprises an ecologically rich landscape in the form of accessible rooftop communal gardens, private gardens and biodiverse roofs.

3.16 All residents will have access to the first floor roof terrace and the seventh floor terrace which has children's play and quiet communal areas (as expanded upon in Section 5.0 and the accompanying DAS).

4.0 Planning Policy & Guidance Framework

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

4.2 The development plan for the application site comprises the Reading Borough Local Plan (2019).

4.3 Relevant sections or policies within planning policy documents which are pertinent to the site's development proposals are identified in the 'Planning Policy Matrix' at Table 4.1.

Table 4.1 Planning Policy and Guidance Matrix

Topic	National Planning Policy Framework (2021)	Reading Borough Local Plan (Nov 2019)	Other Material Considerations
Principle of uses	Section 5 – Delivering a sufficient supply of homes Section 11 – Making effective use of land	CC1: Presumption in favour of Sustainable development CR1: Definition of Central Reading CR4: Leisure, Culture and Tourism in Central Reading CR6: Living in Central Reading CR7: Primary frontages in Central Reading H1: Provision of Housing RL1: Network and Hierarchy of Centres RL2: Scale and Location of Retail, Leisure and Culture Development	Station Hill South Planning and Design Brief (2007) Employment, Skills and Training (2013) Reading City Centre Framework, Entec (2008)
Housing Mix and Density		CR6: Living in Central Reading H2: Density and Mix H3: Affordable Housing H4: Build to Rent Schemes	
Design	Section 12 – Achieving well-designed places	CC6: Accessibility and the Intensity of Development CC7: Design and the Public Realm CR2: Design in Central Reading CR3: Public Realm in Central Reading CR10: Tall Buildings	
Heritage/ Archaeology	Section 16 – Conserving and enhancing the historic environment	EN1: Protection and Enhancement of the Historic Environment Policy EN2: Areas of Archaeological Significance Policy	

		EN6: New Development in a Historic Context	
Residential Amenity	Section 12 – Achieving well-designed places	CC8: Safeguarding Amenity H5: Standards for New Housing H10: Private and Communal Outdoor Space	
Transport	Section 9 – Promoting sustainable transport	TR1: Achieving the Transport Strategy TR2: Major Transport Projects Policy TR3: Access, Traffic and Highway-Related Matters Policy TR4: Cycle Routes and Facilities Policy TR5: Car and Cycle Parking and Electric Vehicle Charging	Revised Parking Standards and Design (2011)
Energy/ Sustainability	Section 14 – Meeting the challenge of climate change	CC2: Sustainable Design and Construction CC3: Adaptation to Climate Change CC4: Decentralised Energy CC5: Waste Minimisation and Storage	Sustainable Design and Construction (2019)
Ecology	Section 15 – Conserving and enhancing the natural environment	EN12: Biodiversity and the Green Network EN14: Trees, Hedges and Woodland	
Flood Risk	Section 14 – Meeting the challenge of climate change	EN16: Pollution and Water Resources Policy EN18: Flooding and Drainage	
Noise		CC8: Safeguarding Amenity EN17: Noise Generating Equipment	
Air Quality		EN15: Air Quality	
Wind		CR10: Tall Buildings	Reading Tall Building Strategy (2018)

5.0 **Planning Principles and Policy Assessment**

- 5.1 In accordance with Section 38 of the Planning and Compulsory Purchase Act (2004), this section considers the acceptability of the proposed development of this site against the statutory development plan and other material considerations.
- 5.2 Based on the relevant policy and guidance summarised in Section 4.0 of this report and the pre-application advice, the key issues for consideration are:
- 1 Principle of Development;
 - 2 Density, Scale and Design of the mixed-use development;
 - 3 Wind/ Microclimate;
 - 4 Dwelling Mix and Affordable Housing;
 - 5 Transport, Highways and Parking Provision;
 - 6 Sustainability;
 - 7 Energy;
 - 8 Air Quality;
 - 9 Noise;
 - 10 Flood Risk and Drainage;
 - 11 Ecology;
 - 12 Archaeology;
 - 13 Contamination;
 - 14 Heritage and Townscape;
 - 15 Daylight and Sunlight; and
 - 16 Fire Statement.

Principle of the Development

- 5.3 The site is situated in the Central Reading Area which the RBLP (para. 5.3.22) recognises “*is becoming ever more important as a residential location, and this applies not only to the inner areas surrounding the core, but increasingly the commercial and shopping core itself. This is to be welcomed, as it adds vitality to the centre at all hours and ensures that there is some feeling of ownership of the streets and spaces. Housing development in the centre will continue to occur over the plan period, with 7,600 new homes expected to 2036*”.
- 5.4 It is also located within the Reading Central Area (CR1) and the Station/ River Major Opportunity Area (CR11) where the site specifically falls within the wider Friar Street and Station Road sub area (CR11a) within which the Council seeks:
- “*...active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. Listed buildings and their settings in the area will be conserved, and opportunities to improve the environment of Merchants Place will be sought*”.
- 5.5 Overall, the indicative potential for the wider sub area is stated (RBLP, pg. 146) as 150-270 dwellings, offices, retail and leisure (with no significant net gain assumed).

- 5.6 As such there is in principle policy support for a residential led mixed use scheme (with Class E uses at ground floor level) subject to proposals being of an appropriate scale/ density and complying with the development management matters outlined in turn below in this section. This is reflected in the pre-app advice from RBC Planning Officers.
- 5.7 At ground floor, Cosmo restaurant is being retained. Consequently, the restaurant space will be occupied and provide an active frontage as soon as the development is complete. Cosmo will have entrances onto Friars Street and Friars Walk along with a full height glazed frontage and colonnade along Friar's Walk which will provide an area for the restaurant unit to spill out onto thereby providing activity and vibrancy. In addition, the proposed smaller incubator retail/ workshop units facing onto Friar Walk and Friar Street will encourage small to medium occupiers to the high street adding to the vitality and retail offer. They will also complement the emerging Station Hill proposals by strengthening the public pathway (Friar's Walk) between the two development sites.
- 5.8 The RBLP does not specifically reference 'co-working spaces' but it does encourage the provision of employment (EM1, EM2) and a variety of sizes and types of employment premises (EM4). Given the policy support for retail /leisure uses at ground floor as well as for employment spaces the proposed development is policy compliant.
- 5.9 Moreover, during pre-application discussions Officers confirmed that *"the mix of uses would be acceptable within this location and would comply with the overall strategy for Central Reading and would comply with the uses as set out in Policy CR11a. Residential is supported as part of a mix of uses and would accord with Policy H1"*.

Density, Scale and Design of the Mixed-Use Development

- 5.10 Full details of the layout, scale and design of the proposals can be found in the accompanying Design and Access Statement (DAS) (and application drawings) which summarise how the application proposals will deliver a scheme of high architectural merit.
- 5.11 Policy H2 notes that appropriate density of residential development will be informed by a number of factors, including the character and mix of the area, its current and future level of accessibility, the need to achieve high quality design, the need to maximise efficiency of land use and the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 5.12 Policy CC6 states *"the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations."*
- 5.13 Indicative densities for different types of area are set out in RBLP Figure 4.5. This outlines an indicative density range of above 100 dph in town centre locations. The supporting text to H2, however, accepts that *"depending on the site, the appropriate density may be significantly greater than this, in view of the need to make best use of accessible sites set out in policy CC6"* (para. 4.4.8).
- 5.14 Policy CR10 notes that within Reading *"tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above"*. The site is situated just outside the Station Area Cluster (CR10a) but is located in the central area and close to the station where there is policy support for a high level of density. The proposed development comprises 7 storeys facing onto Friar Street and steps up to 11 storeys responding (and remaining subservient) to the scale of the Station Hill development (Block F) whilst also complying with CR10 and H2 by providing a high density development to meet the needs for new development as well as capitalise on the excellent public transport accessibility.

- 5.15 Policy CC7 seeks to ensure that all development is of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The proposed development uses red/ orange tones across the façade to match the brick and terracotta commonly used in Reading. There are, however, also subtle variations in the blend of the brickwork and mortar colour to provide each block with its own distinct character. As a result, the proposed development makes a positive contribution to urban design objectives.
- 5.16 Policy CR2's purpose is to secure appropriate relationships between buildings, spaces and frontages within the centre of Reading. Policy CR3 requires proposals to make a positive contribution towards the quality of public realm in the central area of Reading. The proposed development with its ground floor colonnade creating an active permeable edge facing onto Friar's Walk and Friar Street will contribute to the public realm by providing an animated and lively space.
- 5.17 Policy H5 requires that all new build housing outside the central area complies with the nationally described space standard. The site is situated inside the central area where this requirement does not apply. The DAS, however, confirms that each apartment proposed meets and in some cases exceeds these standards despite it being situated inside the central area. Policy H5 also states that on developments of 20 or more new build dwellings at least 5% of dwellings should be wheelchair user dwellings. The proposed development comprises 103 new apartments with 10% of these being designed to be adaptable for wheelchair users.

Wind/ Microclimate

- 5.18 The proposed development comprises 11 storey's and as such a wind/ microclimate assessment is required by Policy CC8 (given it is new development of more than 8 storeys). This has been prepared by RWDI and accompanies this application. This concludes (Section 8, bullet 5) that *"overall wind conditions with the introduction of the proposed development would be relatively calm with no safety concerns. There would be one seating location at the 7th floor terrace with windier than suitable conditions; however, this would be resolved through the implementation of the proposed louvred plant screen and proposed landscaping scheme. All locations would have suitable wind conditions and no further assessment or mitigation would be required"*. On this basis, the proposed development complies with Policy CC8.

Dwelling Mix and Affordable Housing

- 5.19 In terms of unit mix, Policy CR6 seeks that residential developments within the town centre area incorporate a mix of different sized units, ideally a mixture of one, two and three bedroom units should be provided. As a guide, it states that in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable. The proposed development comprises of the following:

Table 5.1 Proposed Unit Mix

Unit	Scheme No.	Scheme %	RBC Requirement
1 bed	41	39.8%	Max 40%
2 bed	56	54.4%	
3 bed	6	5.8%	Min 5%
	103	100%	

- 5.20 On the basis of the above the proposed development complies with Policy CR6.
- 5.21 For build to rent proposals (like the proposed development), Policy H4 expects the provision of 30% on-site affordable housing. The proposed development of 103 residential units comprises

72 market (70%) and 31 affordable (30%) units. As such the proposed development is policy compliant in terms of affordable housing provision.

- 5.22 Policy H4 also sets a number of other criteria for Build to Rent Schemes which the applicants are cognisant of.

Transport, Highway Access and Parking Provision

- 5.23 The proposals will be car free, except for the provision of four disabled car parking spaces. Cycle parking will be provided in excess of RBC standards provided in a secure and sheltered cycle store.
- 5.24 The Travel Plan includes a series of measures to promote sustainable modes of transport with a particular focus on active travel.
- 5.25 The Transport Statement concludes that the proposed development is not considered to result in an adverse impact upon the local highway network, pedestrian and cycle infrastructure or public transport networks and is considered to be fully in accordance with policies TR1, TR3, TR4 and TR5 of the RBLP.
- 5.26 It is therefore considered that the development would not result in a severe residual impact nor would it create an unacceptable impact on highway safety in accordance with the NPPF.

Sustainability

- 5.27 This application is accompanied by a Sustainability Statement, prepared by CPW. This demonstrates that the proposed development is targeting good standards of design and build-quality. It also notes that much attention has been given to reducing the environmental impact throughout the lifetime of the development. In particular it notes that energy, pollution and water efficiency measures will be integral to the building's design as their contribution to retaining sustainability is highly significant.
- 5.28 Overall, it concludes that in general, the proposed development will be constructed using good standards of sustainability which will meet Reading Borough Council sustainability planning policy requirements.

Energy

- 5.29 An Energy Statement has been prepared by CPW and accompanies this application.
- 5.30 It demonstrates how the scheme will incorporate energy efficiency measures, decentralised energy sources and Low and Zero Carbon technology solutions to reduce the predicted regulated CO2 emissions of the development in accordance Sustainable Design and Construction SPD strategy policy.
- 5.31 Overall, the energy statement demonstrates borderline compliance with the planning requirement of achieving 35% betterment on Part L 2013 for residential developments. This narrow margin of compliance is due to outdated electricity carbon efficiency factors embedded within SAP2012 methodology. CPWs recommend that Reading Borough Council Planning Committee assess the proposed development based on updated SAP10 methodology, more commonly used and more in line with the updated Part L Building Regulations to be updated in June 2022.

Air Quality

- 5.32 An Air Quality Assessment has been prepared by GEM to accompany the planning application.

5.33 It includes a qualitative assessment of dust levels associated with the proposed development and notes that the impact of dust soiling and PM10 can be reduced to negligible through appropriate mitigation measures (which it listed at Table 17). Consequently, the latter measures will help reduce the impact of the construction activities to an acceptable level.

5.34 In terms of air quality, it concludes that mitigation measures are required to mitigate air quality impacts on the future occupants of the proposed development along the southern street facing up to and including the fourth floor. These comprise acoustic ventilation panels and triple glazing to all windows facing directly onto Friar Street, reducing the reliance on openable windows to mitigate overheating.

5.35 As a result, the proposed development complies with RBLP Policy EN15.

Noise

5.36 A Noise Impact Assessment has been prepared by Hann Tucker. This document accompanies this application. It includes a detailed environmental noise survey which establishes the current prevailing environmental noise climate around the site and assesses the impact this would have on the proposed dwellings in the context of national and local planning policies.

5.37 Overall, it concludes that appropriate target internal noise levels are achievable subject to mitigation measures such as the use of suitably specified glazing, acoustically attenuated ventilation and appropriate thermal design to reduce to a minimum adverse impact on health and quality of life arising from environmental noise.

5.38 As such the assessment shows that subject to mitigation measure the site is suitable for residential development in terms of noise in compliance with Policy CC8.

Flood Risk and Drainage

5.39 A Flood Risk Assessment (FRA), including a drainage strategy, prepared by JM Enviro accompanies this application.

5.40 RBLP Policy EN18 notes that development will be directed to areas at lowest risk of flooding and must incorporate sustainable drainage systems (SUDs). As set out in the FRA the site is situated in Flood Zone 1 (low probability of flooding) and SUDs have been considered from the outset of the design process and consequently the proposed development includes significant areas of green roofs and soft landscaped areas to minimise surface water runoff. In addition, a blue roof is proposed which will collect and attenuate the majority of the roof area to restrict peak surface water. The FRA concludes that the proposed development can operate safely and without significantly increasing flood risk elsewhere with the inclusion of SUDs.

5.41 On the basis of the above, the proposed development complies with relevant flooding and SUDs development plan policy.

Ecology

5.42 This application is accompanied by the Ecological Survey prepared by Greengage.

5.43 It notes that an ecological site walkover survey was undertaken on 2 February 2022. The survey confirmed the site as being of:

- Low ecological value with limited coverage of semi natural habitats;
- There are no ecological receptors of note, such as records for protected species or designated sites within the likely zone of impact of the scheme;

- The site has negligible potential to support notable and/ or protected habitats and/ or species;
- Selected ecological enhancements are recommended including the provision of wildlife friendly landscaping, a biodiverse living roof, vertical greening, bird boxes and invertebrate habitat features; and
- The proposals have the potential to lead to a 200% biodiversity net gain score associated with area based habitats.

5.44 On the basis of the above, the proposed development will not result in any adverse ecological impacts and will only serve to increase biodiversity on site.

Archaeology

5.45 The site lies in an Area of Archaeological Potential (Policy EN2) as identified on the RBC Proposals Map. An Archaeological Statement, prepared by RPS Group, accompanies this application.

5.46 It concludes that the archaeological potential identified would not preclude development and therefore it is anticipated that an appropriate programme of mitigation can be secured with an appropriate planning condition although this would most likely only be applicable to the footprint of number 39 due to the extensive modern basement under most of numbers 35-38.

Contamination

5.47 A Phase 1 Desktop Study has been carried out by Lustre and accompanies this application.

5.48 It identifies the following potential sources of contamination:

- Onsite – Historical site use as commercial buildings, with various periods of construction, extension and clearance over the years. Made Ground is likely present as a result. In the area of the existing basement however, which extends to circa 4.3m bgl, no Made Ground is anticipated. Contamination of any general Made Ground is likely minor but may include contaminants such as asbestos, metals, inorganics, hydrocarbons etc. In the area of the former garage however more significant contamination may be present.
- Offsite – Wider commercial and light industrial use in the surrounding area, including a coal yard and railway infrastructure and infilled land.

5.49 Overall, it concludes that the potential contamination from the historical use of the site and presence of Made Ground may represent a minor source of contamination.

5.50 However, residual and localised contamination may also be present from the former garage on site. Given the proposed site wide hardstanding, no notable infiltration to ground and the presence of a large basement, various exposure pathways and pollutant linkages are no longer viable and as such low risks have been determined from soil contamination to future site users and controlled waters, as well as from ground gases. However, validation of these risks through investigation post-demolition is recommended.

Heritage and Townscape

5.51 This application is accompanied by a Townscape and Heritage Visual Impact Assessment, prepared by KM Heritage.

5.52 It states (para. 4.69) that *“overall, the townscape view analysis demonstrates that even where the proposed building is most prominent the carefully considered scale and massing, choice and tonality of materials and articulation of the facades as well as the positive role it will play*

in marking Friar's Walk will ensure that the building is a Beneficial contributor to the townscape of the area." It also notes that proposals will have no impact on any designated heritage assets.

- 5.53 Consequently, it concludes that the proposals comply with national and local statute, policy and guidance in respect of townscape and built heritage.

Daylight & Sunlight

- 5.54 A Daylight Assessment Report by Delva Patman Redler accompanies the planning application. The assessment shows that:

- In VSC terms, 90% of the neighbouring windows will experience no more than a low adverse reduction in daylight. The NSL results indicate that 91% of the neighbouring habitable rooms will experience no more than a low adverse reduction. The daylight results generally show a good adherence with the BRE guidelines and the proposed massing by Stefan Shaw Studio performs well when compared to other schemes in the area.
- The sunlight results indicate that 95% of the neighbouring living rooms will experience no more than a low adverse reduction.
- The internal daylight and sunlight results show that the proposed dwellings will benefit from acceptable levels of light for the immediate surrounding area.

- 5.55 On the basis of the above the report concludes that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 123(c) of the NPPF.

Fire Statement

- 5.56 A Fire Statement accompanies this application. It identifies the key fire strategy issues and notes that ongoing input has been provided to assist the design team as they incorporate the fire strategy requirements into their design.

- 5.57 It also notes that this will continue to be developed as the scheme progresses and discussion with approving authorities and the local fire and rescue service will be undertaken.

Amenity and Open Space

- 5.58 Applications for new residential development of 10 dwellings or more must be accompanied by an Open Space analysis, as set out below.

Relevant Planning Policy

- 5.59 The relevant national and development plan policy regarding open space comprises:

- NPPF paras. 92, 96 and 97; and
- RBLP Policies EN7, EN8, EN9 and EN10.

- 5.60 The site is not designated as a Local Green Space or Public Open Space under Policy EN7 nor does it include any undesignated open space (Policy EN8).

- 5.61 Policy EN9 requires all new development to make provision for appropriate open space based on the needs of the development and ensure satisfactory provision of children's play areas. It goes on to state that new open space should:

- *"Be in useable parcels of land and not be fragmented;*
- *Be safely and easily accessible and not severed by any physical barrier, including a road;*

- *Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm;*
- *Create a safe environment, appropriately considering lighting and layout to reduce the fear of crime;*
- *Provide some informal landscaping for aesthetic, wildlife and recreational purposes; and*
- *Link into the Green Network where possible”.*

On Site Amenity Space

5.62

The site does not currently include any private/ public green/ open space. The development proposes 600 sqm of external residential communal amenity spaces at 1st and 7th floors. The DAS sets these out in more detail but in summary:

- At 1st floor an ecologically rich roof garden accessible for all residents is proposed which creates a space for quiet reflection and provides a visual amenity for courtyard facing apartments. Seating areas are integrated into the planters so as to integrate seamlessly with the environment while planted defensible space will provide privacy for residents facing onto the courtyard.
- At the 7th floor a south facing full site width roof terrace is proposed which will be accessible for all residents and offers panoramic views over Reading Town Centre. Children's play spaces with soft finishes and naturalistic play are located to the southern edge away from the residential apartments. A planted green edge creates an ecologically rich surrounding and visual amenity for residents. Seating areas are integrated into the planters so as to integrate seamlessly with the environment.

5.63

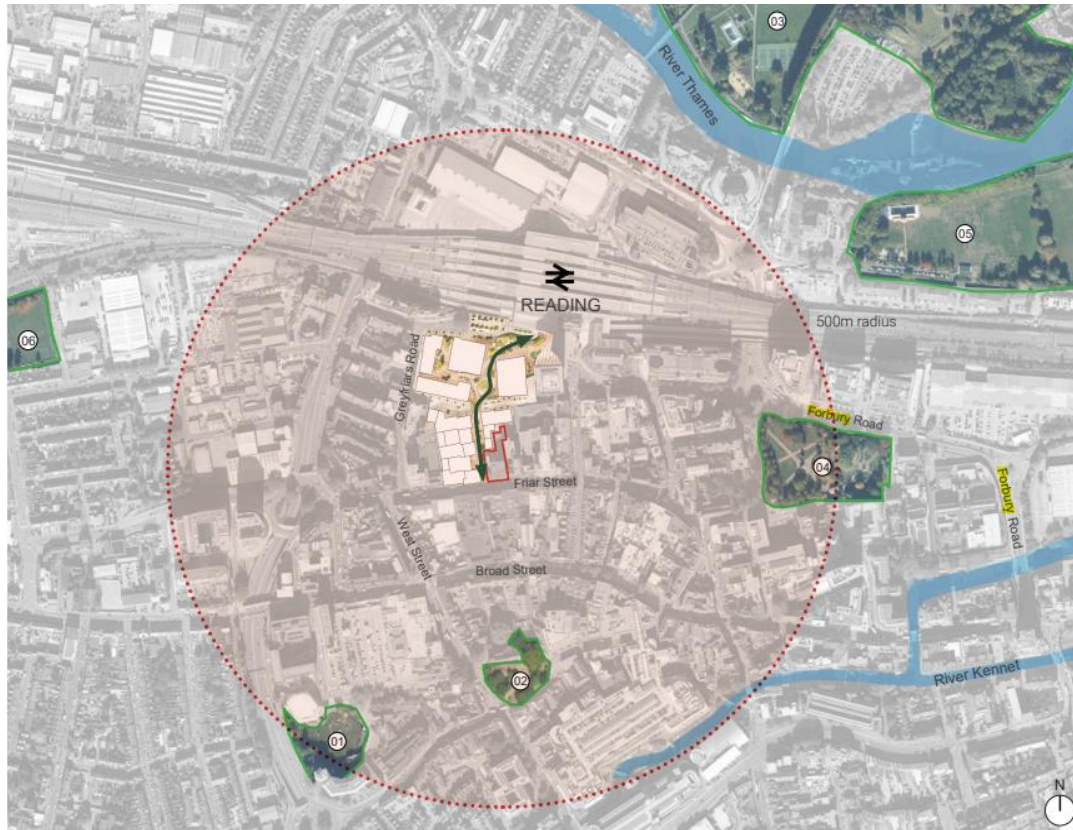
As such the proposed development will significantly increase the existing situation and whilst these will not be open to the public they will be open to and shared by all residents and their guests.

The Surrounding Area

5.64

In addition to accessing the amenity areas on site future residents will also be able to access public green spaces in the surrounding area (Figure 6.1), including Forbury Gardens which is a 5 minute walk away.

Figure 5.1 Open Green Spaces in Reading Town Centre



Source: Stefan Shaw DAS (Key – 1. Lavender Place; 2. Town Centre Cemetery; 3. Christchurch Meadows; 4. Forbury Gardens; 5. King's Meadow; and 6. Victoria Park)

5.65

Overall, the proposed development will provide useable amenity space for future residents and their guests. The site is also close to a number of public open spaces.

6.0 Conclusions

- 6.1 This Planning Statement assesses the proposed development in the context of relevant national and local planning policy as well as other material considerations. It should be read alongside the various other reports which accompany the planning application.
- 6.2 The application responds to both a need for housing (including affordable housing) delivery and the mixed use aspirations for the Central Reading area. The application site forms a sustainable location, accessible by a choice of means of transport, for both of these elements.
- 6.3 This Statement shows how all relevant planning matters identified though pre-application have been addressed where appropriate and that the development conforms with the provision of the development plan and has significant merit in planning terms. In summary, the proposed development will:
- 1 Create a vibrant residential-led mixed use scheme in this accessible town centre location building on the strength of Station Hill;
 - 2 Replace the currently blank facades facing the new Friars Walk with vibrant new active frontages at ground floor;
 - 3 Make a positive contribution to the public realm enhancing the north south route between the Station and the retail core within Reading Town Centre;
 - 4 Provide much needed new private and affordable homes, as well as co-working space and retail/ food and drink units; and
 - 5 Utilise the sites location and the design of the proposals to seek appropriate amenity and biodiversity opportunities.

