

SITE: 138-144 FRIAR STREET, READING.

RE: RESPONSE TO SKYLINE CAPITAL INVESTMENTS NON OBJECTION

We refer to Skyline Capital Investments' letter dated 28.11.22 and further comments of 1.12.22, and respond to their key points and note their comments, observations and that it is not an objection.

Firstly, it is disappointing that a letter has been submitted on 28.11.22 when planning committee is scheduled for 7.12.22, especially as the application was validated 09.09.22 and the consultation period expired 05.10.22. We have also held several public consultation events (advertised widely); the application was advertised and an article about the scheme was also published in the local newspaper and online, notices were displayed local to the site and we note the Council served consultation letters locally. Therefore, the statutory consultation process has been followed and we consider it is now unreasonable for a local neighbour to be requesting amending drawings and a consultation at this late stage, notwithstanding we do not agree to their view as set out below.

Secondly, we note Skyline support the principle, however, we should reaffirm this is a proposal for a hotel development that has been subject to extensive pre-application negotiations and public consultation prior to submission and during consideration and has been designed to respect neighbouring buildings and not to frustrate or restrict future development of said sites, which may or may not actually ever come forward.

Emerging Proposals for 40, 45 & 46 Broad Street

Skyline refers to owning 40, 45 and 46 Broad Street, for the avoidance of doubt, these are to the north of the Applicant's site, and their proposals, by their own admissions, are for 'refurbishment and extension to existing buildings' and are at an early stage. As such, we have not been provided any details of their 'emerging proposals' so it is not possible to even consider how a scheme, which is fully developed and ready for determination, could impact their aspirational ideas. In any event, we have to question the potential to develop their said sites and actually how the hotel scheme could impact their site, which we are advised has a former dance hall/ theatre and historic chimney, which we note is likely to be protected by the Council.

Key Considerations

In response to their 'Key Considerations' - Skyline are stating they would like to engage and work collaboratively with the Applicant. For the avoidance of doubt, the Applicant is more than happy to work with other landowners, however, we are advised they have not been forthcoming to engage and have sought to raise concerns to a scheme that they acknowledge will 'become a destination within the city centre'.

Separation Distances: they refer to Policy CC8 and a 20m separation distance, and the southern elevation; for ease the policy states:

1. "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.

The 20m applies to dwelling-to-dwelling distances. For the avoidance of doubt, the application is for a hotel and we have no indication of their proposals, so we are unable to even assess the separation distance.

Furthermore, if they have regard to the floorplans, the windows they refer to serve hallways and are secondary bedroom windows, they are not serving dwellings. If we are aware of their proposals, consideration of these windows is possible, but we have seen no drawings or ideas of a scheme. It is our understanding they have only recently acquired the site so it is likely any ideas are extremely early at best.

Secondly, they refer to 'very small and quite oppressive separation distances' - again we reiterate they have no scheme so are unsure how the Applicant can even assess such.

Thirdly, Skyline are requesting the Applicant presents 'marked-up plan showing the separation distances' and to assess against Policy CC8 - we again reiterate, the Skyline are asking the Applicant to provide a detailed analysis of how of a proposed scheme will protect the residential amenities from a hotel to an aspirational idea with no drawings - we are perplexed by such a request.

Massing: Skyline are seeking to request that the Applicant 'scales back upper floors to create less oppressive relationship to properties to the rear' and refers to Figure 2. The Applicant has worked constructively with the Council to present a scheme that is well considered and has regard to the mass and bulk of the immediate area. Skyline are seeking for a reduction in massing to a shared service yard that may not or may never be developed. Skyline has indicated they want to work collaboratively with the Applicant but have no scheme nor ideas other than to one day think about building out a scheme on their site - their approach is duplicitous.

Daylight & Sunlight: for the avoidance of doubt, the Applicant's consultant has assessed sunlight & daylight of the residential dwelling at 46 Broad Street - the findings are shown below. BRE have responded and confirmed they are satisfied with the response and there will be no harm to 46 Broad Street.

This reference relates to **46 Broad Street** to the south of the site where the BRE have identified that the second floor may contain a flat. In our preliminary research of the neighbours to this site we did not identify anything which would have suggested that this could be the case and on checking this again we come to the same conclusion.

Nevertheless, we have assessed this second-floor space adopting a notional room depth of 4m. The positioning and size of the window has been estimated using site photography.

A summary of the findings are below:

Property, room & window attributes				VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation	Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro/Ex ratio	Exis. (% rm)	Prop. (% rm)	Loss (m ²)	Pro/Ex ratio	Annual (%APSH)				Winter (%APSH)		
												Exis.	Prop.	Loss	Pro/Ex	Exis.	Prop.	Pro/Ex
Note: Red = outside BRE guidelines; Blue = gain in light																		
46 Broad Street																		
F02	R1	LKD	W1 ↑	28.2	24.8	3.4	0.88	99%	99%	0.00	1.00	North	North	N/A	N/A	North	North	N/A

Here the analysis illustrates that the primary VSC assessments illustrates modest light loss with reductions of 12% only. We appreciate the BREs comments regarding NSL assessments based on notional rooms (they prefer not to rely on such studies) but we have also assessed the notional room for NSL which illustrates no change.

The orientation of this space is largely north facing so this property need not be assessed for sunlight impacts.

Overall, therefore, the analysis demonstrates that this neighbour will fully comply with the BRE Guidelines in daylight & sunlight terms.

Design of South Elevation: the southern façade is of a high standard of design, much the same as the remainder of the building, albeit the site is not in a conservation area. Full particulars of the design are presented in drawings and the DAS, as well as consideration in the Heritage Impact Assessment. Furthermore, the design has been subject to public consultation, pre-application discussions, and formal consultation by the Council. It seems Skyline want further consultation on top of what has

already been an extensive consultation process of which details have already been presented and supported by the Council - it is recommended for approval at planning committee.

Construction: we note Skyline support the commitment to provide a Construction Management Plan ("CMP"), the Applicant has already provided an outline CMP and a fully detailed document will be provided prior to the commencement of development. As is customary, this will be worked up by the appointed construction team who will, as is best practice, engage with neighbouring landowners.

For the avoidance of doubt, neighbours will be notified of construction timings and access arrangements to the service yard and will be kept notified as is best practice.

Deliveries: as Skyline have noted, one option presented by the Applicant is for deliveries via Fife Court, which is a private access owned by the Applicant. Therefore, loading and unloading for the said court is a civil matter and access arrangements are available from the service yard, much the same as 40, 45 and 46 Broad Street indicate they utilise. However, as noted in Mode's Delivery & Service Plan ("DSP"), alternative arrangements are in discussions with the Council's Highway Team from Friar Street. In any event, prior to operation, a finalised DSP will be submitted and adhered to in the future.

Access Easements: Skyline refer to a Deed of Easement to the service yard, this again is a civil matter and not a planning matter, which we are advised is not material to the determination of this planning application. We are advised the applicant owns the access road and has rights to adjust routes over such for redevelopment and to those it has granted access over it too.

Concluding Remarks: we note Skyline have no objection to the application and is seeking to work collaboratively with the Applicant. The Applicant is of course happy to work with Skyline, we are advised the Applicant has again reached out to Skyline to discuss.

We are also advised the Applicant has extensive consultation over several years with the pension fund that only recently sold to Skyline due to covid impacts to the pension funds.

Further Comments - 1.12.22

Justification for Massing: we note Skyline are further questioning, massing, we therefore refer them to the heritage impact assessment and DAS that clearly explore massing and the transition from Friar Street (the Ibis) to Broad Street. This matter was also subject to extensive testing at pre-application stage. We reiterate, the massing is appropriate for this town centre location.

We again reiterate, Skyline do not have a scheme and therefore are making hypothetical comments, especially as the hotel backs on to the shared service yard.

BRE: we refer readers to the DPR response, which confirms VSC and NSL of 46 Broad Street has been tested and BRE's confirmation that the development is in full compliance with BRE guidelines.

Summary

The reduction in mass, assessing a scheme and seeking to further consult on a scheme that has already been subject to extensive and wide public consultation and is supported by the planning team via a recommendation for approval at planning committee, therefore it is not appropriate to start a formal reconsultation.

However, the Applicant has reached out to Skyline to discuss their aspirations for their site and will consider the hallway and second bedroom windows to the southern elevation, as advised. Until they present a scheme, the Applicant has no understanding of their aspirations, nor whether a scheme may even come forward, but is always more than happy to work collaboratively.

Yours faithfully,

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Town Planning Bureau