
Planning Statement

Former Bristol & West Arcade, 173-175 Friar Street
and 27-32 Market Place



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1. Executive Summary

- 1.1. This statement has been prepared in support of a planning application for the redevelopment proposals for 173 – 175 Friar Street to provide a 182 bedroom hotel and a listed building application relating to the proposals at 27 – 32 Market Place to provide a mixed residential and retail and leisure uses. The redevelopment will deliver a new high quality hotel that is targeting the 4 star end of the market plus 8 new residential units at Market Place as well an enhanced retail and leisure offer across the site.
- 1.2. The replacement building at Friar Street, will be designed to a high quality standard taking references from the surrounding context and adjacent buildings. High quality materials have been selected to ensure that the building is of the highest possible standard to fully integrate within the streetscene. The materials will also ensure that the building is durable and attractive for the duration of its existence.
- 1.3. The proposed scheme includes the opportunity to repair, refurbish and reinstate active uses to three vacant listed buildings at 27 – 32 Market Place. The buildings have been vacant for approximately 10 years and the scheme will provide a heritage benefit in bringing these buildings into a viable use.
- 1.4. The proposals will deliver 8 new high quality residential dwellings within the core town centre area, and contribute towards the Borough's affordable housing targets by providing an off-site contribution in line with Policy.
- 1.5. Overall, the proposals will deliver a net increase in employment floorspace, creating new jobs for the borough through the hotel, hotel bar and restaurant and the commercial uses at Market Place. The proposals will also generate a significant level of new expenditure into the local economy at around £3.9 million per annum and new income for the Borough through business rates and council tax rates at around £550,000 per annum.
- 1.6. The proposals will also reinstate a new active frontage to Friar Street, will re-provide the public house at 29 – 31 Market Place and reinstate the historic right of way through the site to once again connect Friar Street to Market Way and onto Broad Street.
- 1.7. The proposed scheme will deliver a series of planning benefits not just in terms of the uses proposed but in relation to the regeneration benefits that the proposals will bring to not just the site and the wider Reading town centre, the Section 106 / CIL contributions as well as a range of significant socio-economic benefits.

2. Introduction

- 2.1. On behalf of our Client, Sonic Star Properties Ltd, Savills have been instructed to prepare and submit this application for full planning permission and separate Listed Building Consent at the Former Bristol & West Arcade, 173-175 Friar Street and 27-32 Market Place for the following-

173 – 175 Friar Street:

“Demolition of vacant former Bristol & West Arcade (173-175 Friar Street) and redevelopment of site including minor excavations at basement level to provide an 8-storey building to provide a hotel (C1 use) of up to 182 beds, creation of a bar/restaurant/gym at ground floor associated with the hotel and the provision of ancillary facilities including outdoor terrace, demolition of rear parts of 29-31 and 32 Market Place, the change of use of the retained units at 27-28, 29-31 and 32 Market Place at first, second and third floors to provide 8 residential units, retention of flexible Class E uses at ground and basement floors of 27 – 28 and 32 Market Place, retention of 260.4 sqm as a public house (Sui Generis use) at basement and ground floor of 29 – 31 Market Place with associated external works, landscaping, plant, cycle store, and substation”

27 – 32 Market Place:

“Demolition of 20th Century additions to the rear of 29-31 Market Place and 32 Market Place with associated internal and external alterations to listed buildings”

- 2.2. This application follows extensive pre-application discussions with the Local Planning Authority (LPA) since December 2019. As part of the preparation of the application, the applicant team have also undergone a comprehensive consultation process through meetings with Ward Councillors, community consultation events, amenity groups and local businesses an opportunity to view and respond to the proposals. Various revisions have been made to the proposals and further information collated in order to address the discussion held and advice received from these stakeholders.
- 2.3. The site currently has an extant consent, granted on 9th January 2019 (refs 180358 and 180359) for the demolition of the former Bristol & West Arcade and the erection of an 8 storey mixed use building comprising residential, office and retail units along with residential and commercial units (including a pub use) at 27 – 32 Market Place.
- 2.4. These applications are supported by a suite of documents prepared by various consultants and these documents will be referenced throughout this statement where relevant. The supporting documents include:
- Application Forms;
 - CIL Forms;
 - Site Location Plan;
 - Existing and proposed plans, prepared by Norr Consultants;
 - Demolition Plans, prepared by Norr Consultants;

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- Design and Access Statement, prepared by Norr Consultants;
- Draft Operational Management Plan, prepared by the applicant;
- Economic Impact Statement, prepared by Savills;
- Retail Market Assessment, prepared Hicks Baker;
- Office Market Assessment, prepared by LSH;
- Heritage Statement, prepared by Turleys;
- Condition Report for Market Place Properties, prepared by Roc Associates;
- Archaeology Statement, prepared by RPS;
- Transport Statement, prepared by iTransport Planning;
- Hotel and market Place Framework Travel Plan, prepared by iTransport Planning;
- Delivery and Servicing Statement (included in Transport Statement), prepared by iTransport Planning;
- Air Quality Assessment, prepared by South Downs Environmental Consultants;
- Bat Survey Report, CSA Environmental;
- Sustainability Statement, prepared by JH Partners;
- BREEAM Pre-Assessments prepared by Summers Inman;
- Surface Water Drainage & SuDS Assessment, prepared by Clancy Consulting;
- Fire Engineering Review, prepared by JGA;
- Odour Assessment, prepared by South Downs Environmental Consulting;
- Indicative external lighting scheme, prepared by JH Partners;
- Outline Utilities Statement, prepared by JH Partners;
- Provisional roof level MEP requirements, prepared by JH Partners;
- Wind & Microclimate Assessment, prepared by RWDI.

2.5. This statement find that the proposed development complies with the Development Plan, as well as other relevant material considerations, including the National Planning Policy Framework (NPPF). This statement will set out that the proposal will deliver sustainable development in accordance with the NPPF and concludes by setting out the public benefits that will be brought forward by the scheme.

3. Site and Surroundings

- 3.1. The application site is located within Reading Town Centre, on the principal shopping streets of Friar Street and Market Place. The application site incorporates several properties including 173-175 Friar Street and 27-32 Market Place.

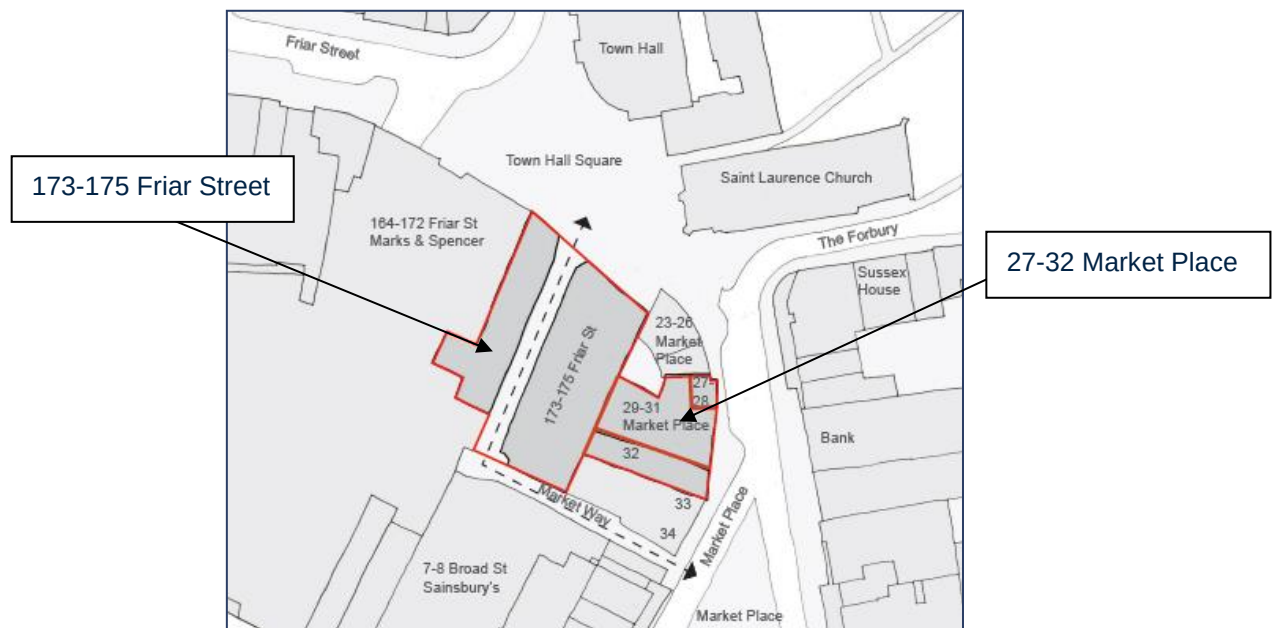


Figure 1- Existing Site

- 3.2. The site lies partly within the Market Place/London Street Conservation Area and the properties which front Market Place are Grade II Listed. The site is located within the designated central core of Reading, where active frontages are encouraged at ground floor level, and a mixture of town centre uses are welcomed. The site is in a central location, being situated on the corner of the Town Hall Square and in close proximity to Reading rail station to the north and key town centre destinations such as the Oracle to the south. Also in close proximity to the site is the Town Hall, Reading County Court and the Grade I Listed St Lawrence Church. The Forbury Gardens are also within walking distance.
- 3.3. As a result, the application site is in a highly accessible location with access to several local bus services, as well as being located in close proximity to Reading Station, which will soon be served by Crossrail services to Central London.
- 3.4. Given its location in a prominent position in Reading Town Centre, it is essential that viable proposals to reinvigorate this vacant and derelict site comes forward.
- 3.5. According to the Council's Proposals Map, the site is also subject to the following site specific designations:
- Reading Central Area;
 - Primary frontage in Central Reading

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- Primary Shopping Area;
- Air Quality Management Area;
- Office Core;
- Abbey Quarter;
- Area of Archaeological Potential;
- Partially within the Market Place/London Street Conservation Area;
- Partially within the High Streets Heritage Action Zone for Market Place/London Street Conservation Area;
- The frontage of 175 Friar Street is also of townscape merit.

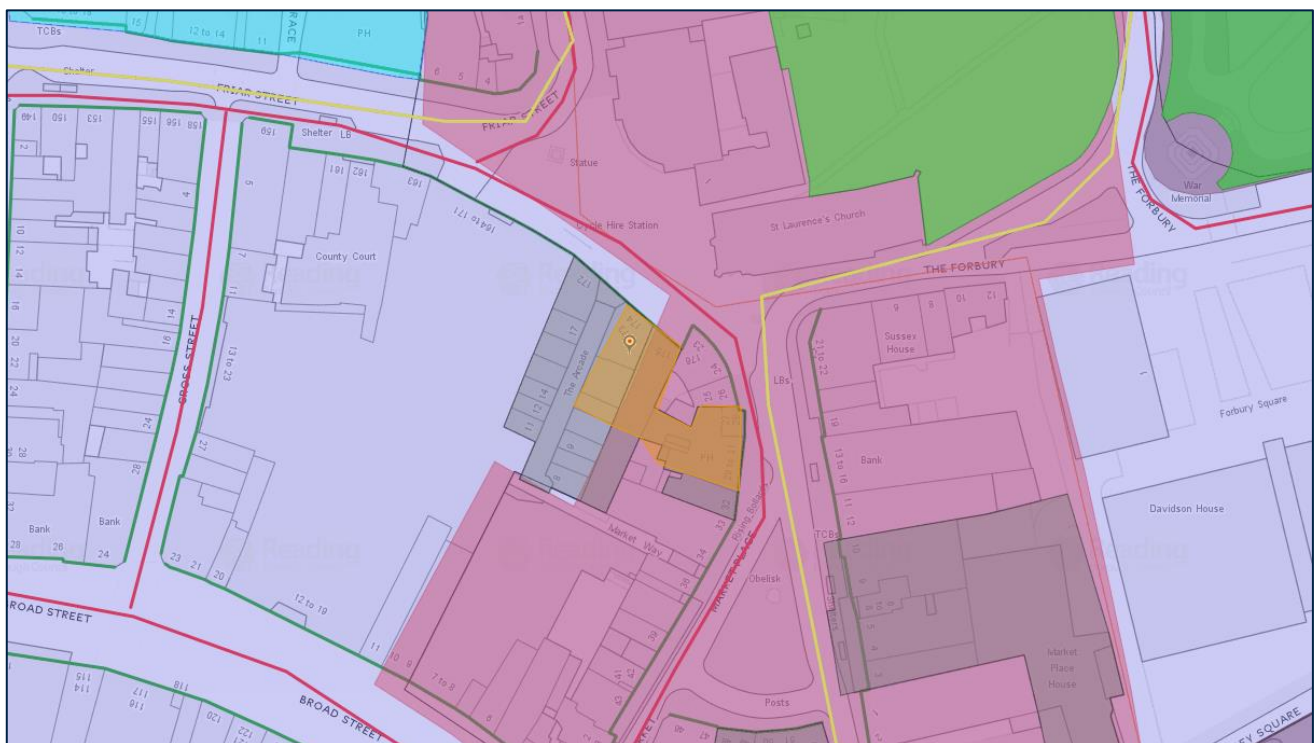


Figure 2- Extract from Reading's Proposals Map

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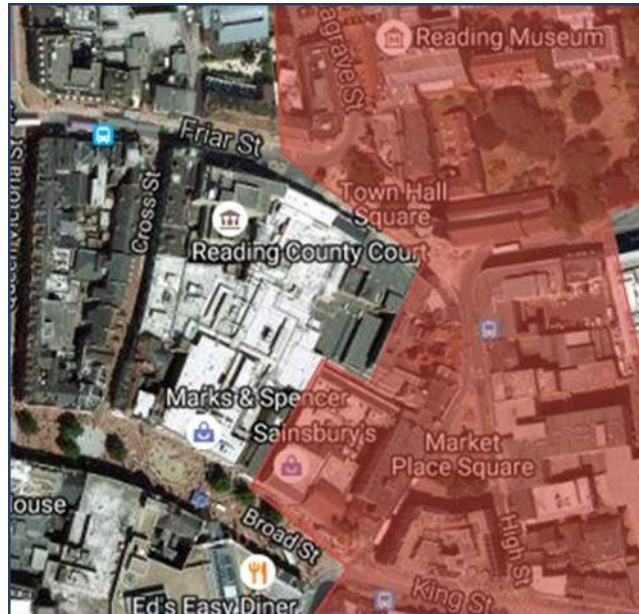


Figure 3- Market Place/London Road Conservation Area Boundary

- 3.6. The application site does not lie within an area at risk of flooding (Flood Risk Zone 1) and only partially at low-medium risk from surface water flooding within the existing public walkway.
- 3.7. The newly adopted Local Plan designates the site for development at Policy CR14d. This states that the site is designated for the change of use of listed buildings and development of the remainder of the site for residential and/or offices with retail and related uses on the ground floor, retaining the arcade form which follows the uses consented under the 2019 permission. Since this permission was granted, the retail and office market in Reading (and across the UK) has vastly changed which is set out clearly in the submitted Retail Market Assessment and Office Market Assessment reports. As a result, the uses previously consented are no longer desirable to the market and are unlikely to come forward on this site. Given that it has been vacant for a significant period of time, the re-use of the site is considered highly important which is proposed in this new application.

173-175 Friar Street

- 3.8. This part of the site is currently vacant and in a poor state of repair. The building was constructed in the 1950s, following bomb damage from World War II, and is comprised of two formerly separate properties, 173-174 Friar Street and 175 Friar Street. The combined properties now comprise a vacant covered retail arcade with three floors of vacant office accommodation above.
- 3.9. The retail arcade previously provided a pedestrian route from Friar Street through to Market Place and onto Broad Street, however this route has been removed from use following the installation of a hoarding around the site to ensure there are no safety risks to the public. The route from Market Place / Market Way and Broad Street is still in operation via the Sainsburys but no direct access is possible through the site to Friar Street. The access to Market Way is currently managed by Sainsburys in line with their opening hours.

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- 3.10. To the rear of the Former Arcade, construction works have been carried out under planning permission reference 061033, however these works were halted around 2008 at the time of the economic market crash. These works reveal that this planning permission, granted in 2007 was partially implemented in accordance with the provisions of S.56 of the Act which was presented through formal pre-application submission in February 2016 (ref: 160184/PREAPP).



Figure 4- Existing Friar Street building



Figure 5- Former entrance to the retail arcade

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27-32 Market Place

- 3.11. The second part of the site comprises those properties located on Market Place (Nos. 27-28, 29-31 and 32 Market Place), which are all Grade II listed, and are currently vacant.
- 3.12. Originally built in the 17th Century, these properties have been altered and remodelled over the years, with the whole site having been occupied by multiple different tenants. This has resulted in some odd layouts, for instance the rear of Nos. 27-28 is incorporated into the adjacent former public house. There are, however, several elements of historic interest as identified in the listing descriptions (included in the submitted Heritage Report).



Figure 6- 27 & 28 Market Place



Figure 7 – 29 – 31 Market Place (Former Cooper's Arms)

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Figure 8 – 32 Market Place

- 3.13. The last use of 27-28 Market Place was as a retail unit (Class E / A1 use) on basement and ground floor levels, with ancillary retail offices on the three upper floors. As noted above, to the rear, the rooms form part of the adjoining pub premises. Nos. 29-31 Market Place is a former pub (The Coopers Arms) which is arranged over basement, ground, and three upper floors (sui generis, formerly A4 use). The only tradable pub floorspace was at ground floor level, with stock storage in the basement and ancillary residential accommodation and storage on the upper floors. The last use of No.32 Market Place was as a bank (Class E(c)(i), formerly A2 use), with ancillary office use above.

Site Surroundings

- 3.14. The wider Reading town centre is characterised by a diverse range of building uses, forms and heights. Key uses include the Town Hall, Church, train station, Forbury Gardens, hotels, bars/restaurants and shops including the Oracle Centre.
- 3.15. The photographs taken from the roof of 27-32 Market Place (see Figure 9) clearly illustrate that the site sits within a highly varied townscape with a range of taller buildings and buildings of varied massing including the Ibis Hotel and the R Plus Building (2 Blagrove Street).
- 3.16. This site context, as well as the extant planning consents on the application site, form the basis for the design rationale of the proposals outlined in this planning application. The townscape analysis further evidences this as it shows that there have been a range of buildings heights and massing which have been approved.

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Figure 9 – Views from the roof of 27 – 32 Market Place



Figure 10 – Ibis Hotel, Friar Street

4. Planning History

- 4.1. The application site has an extensive planning history relating to the various properties that are included within the boundary of the site. The full planning history is detailed at Appendix 1 however a summary of the most relevant permissions has been provided below.

Extant Permission ref: 180358 FUL and 180359 LBC

- 4.2. Following extensive pre-application discussions with officers at Reading Borough Council across three years, a planning and listed building consent application was made in February 2018 for the following development at the site:
- 4.3. The application also included the listed properties at 27 – 32 Market Place which were seen as a heritage benefit in bringing them back into active use as well as the removal of more modern additions to the rear.
- 4.4. During the application, the scheme evolved in response to local resident comments and design comments received by officers, mainly in relation to the new elevation fronting onto Friar Street. The proposals were then considered acceptable by officers and put forward for determination at planning committee with a recommendation for approval.



Figure 11 – CGI image showing the consented scheme from Town Hall Square / Friar Street

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Figure 12 – CGI images showing the consented scheme from The Forbury

- 4.5. Following planning committee on the 18th July 2018, permission was granted subject to a Section 106 Agreement and conditions on the 9th January 2019.
- 4.6. This permission was formed much of the parameters of development that is now being sought particularly in terms of height, massing, footprint and design. There are also no changes proposed to the approved scheme at 27 – 32 Market Place which is again included as part of this application.

Extant Permission ref: 0601560 FUL

- 4.7. One of the most relevant planning permission is the 2007 approval which obtained permission for the following development,
- “Refurbishment of shopping arcade and offices. Partial demolition and addition of health club and 14 dwellings”*
- 4.8. This permission saw consent for a mixed use 5 storey building with three tower elements within the Friar Street element of the site rising to a total of 8 no. of stories. The proposals retained retail uses at ground floor level with offices, health club and residential units above. This application did not include the refurbishment or repair of the properties on Market Place and therefore had limited heritage benefits when compared to the current application.

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Figure 13 – view from corner of Friar Street and Blagrove Street



Figure 14 – 2007 Consented scheme from Blagrove Street

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Figure 15 – view of consented massing from entrance to Forbury Gardens



Figure 16 – View of consented scheme from The Forbury

Status of 2007 Consent

- 4.9. Works were undertaken following the consent to implement the 2007 permission. Works were undertaken to the rear of the site where the beginning of the swimming pool is visible (see Figure 17). The development was never completed, presumably due to market conditions at the time however it is considered that it sets the baseline for what has already been considered acceptable at the site in terms of height and design.



Figure 17 – Construction works to the rear of the arcade

- 4.10. A pre-application enquiry (ref: 160184/PREAPP – See Appendix 2) was made to the Council regarding whether this planning permission had been lawfully implemented. The Council concluded that,
- “it would appear that permission 06/01560/FUL/061033 was physically implemented. However, it would appear that not all pre-commencement conditions were agreed, and, as such, it is not clear as to whether the permission was lawfully implemented or not”.*
- 4.11. We note that Officers stated during the pre-application meetings in late 2016 that the consented scheme is considered to be a ‘line in the sand’ for future development proposals. The permission does however establish the principle of the height and land uses as a basis for developing new proposals.
- 4.12. This was included in the 2018 officer committee report (paragraph 3.3) where it was stated:
- “Although the legal status of this 2007 permission cannot be determined under this application, it can be accepted that this proposal has set some parameters for the height and bulk of development within this site.”*
- 4.13. The 2007 consent therefore provided the baseline parameters for the height and bulk of development that was subsequently established through the approval of the 2019 planning and listed building consent. These parameters have again been taken forward when developing the current proposals for the hotel application where the height, massing and bulk for the new Friar Street building have been maintained if not reduced to ensure there is no material different in impact.

5. Pre-application discussions and consultations

- 5.1. The applicant has again sought extensive pre-application advice from Reading Borough Council across a 12 month period with the first pre-application meeting held in December 2019. Two further meetings have been held between the applicant and officers across 2020 (virtually). The first pre-application meeting concerned the redevelopment of the Former Bristol & West Arcade element of the site only however the second and third pre-application meeting included the properties at Market Place as part of one application.
- 5.2. It was confirmed by officers during the pre-application discussions, that the proposed scheme did not have to be presented once again to the Council's Design Review Panel given that it was largely following the approved consent and design approach.
- 5.3. Towards the end of 2020, public engagement meetings were carried out including two virtual public exhibitions with letters sent to local residents, amenity groups and businesses as well as being advertised on social media, in the press and online via a development website. Briefing meetings have also taken place with ward councillors and the Arts and Heritage Forum as well as other stakeholders including Historic England.
- 5.4. A Statement of Community Involvement is included as part of this application, prepared by Instinctif Partners which provides further detail on the consultation strategy and the feedback received.

Consultation Summary

Reading Borough Council

- 5.5. The redevelopment proposals have been subject to regular meetings with Matthew Burns within the Council's planning department. Each iteration of the scheme has been presented to officers through their formal pre-application route and consulted with various internal consultees including heritage, transport, and environmental health.
- 5.6. Various additional design submissions were made to the LPA during the pre-application process following comments from the Council's Heritage Consultant. Each submission and design iteration has been revised to respond to officer comments.
- 5.7. One written response was issued by the Local Planning Authority as a record of all three meetings and discussions in between meetings dated 12th October 2020 (Appendix 3). The pre-application response was largely positive, recognising the benefits of the scheme and that a hotel development is an acceptable town centre use, and also clearly set out the required justifications or further evidence to form part of a future application particularly in relation to the move away from the consented / allocated uses for the site and loss of office and retail uses both existing and consented.

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Ward Councillors

- 5.8. The applicant team has met with various Ward Councillors during November and December 2020 to brief councillors on the revised scheme and the reasons for moving away from the consented scheme.
- 5.9. No formal comments have been received from Councillors however the views have largely been positive and encouraging to see the site be returned to active use. Again, the scheme has positively responded to the matters discussed during the pre-application engagement with Councillors to specifically address their comments raised during meetings.

Historic England

- 5.10. The applicant submitted a briefing and design information to Historic England in October 2020 (ref: requesting a meeting to discuss the evolving proposals for the Friar Street development. As the site is in close proximity to a number of heritage assets including Grade I and Grade II* listed buildings this was considered appropriate to once again consult with Historic England. A meeting was subsequently arranged during November 2020 to meet with Rachel Fletcher, the appointed Inspector with their written response issued on the 2nd December 2020.
- 5.11. It is important to highlight that the recent discussions with Historic England were as an extension of the key discussions with Historic England in early 2017 with the appointed Inspector, Richard Peats who also attended a pre-application meeting at the Council's officers relating to the consented scheme in March 2017. Discussions with Richard Peats continued until February 2018 prior to the submission of the extant application.
- 5.12. From the previous discussions with Historic England, their main concerns related to the design of the Friar Street elevation on the basis that No. 175 Friar Street is identified as a building of townscape merit, although there was no objection in principle to its replacement with a high quality design. The previous approved scheme achieved a suitable and high quality replacement design which was largely supported by Historic England in their February 2018 written response (see Appendix 4). The now proposed scheme seeks to replicate this in terms of the principles of design and materials however does introduce an extended bay across from the stone element on Friar Street and an increased height and width opening from Friar Street into the arcade route through the site and central courtyard / hotel reception area. Initial comments were raised in relation to the increased opening at it was requested to ensure this is robustly justified in any planning submission to ensure it is necessary and the arcade route will be used safely and securely. This further justification has been provided as part of the application.
- 5.13. As the buildings on Market Place that form part of the application are Grade II listed, and already benefit from listed building consent and planning permission, it is not considered that this will fall to be considered by Historic England.

Secure by Design

- 5.14. In early January 2021, the architects met with the Crime Prevention Design Advisor for Berkshire, Ann Chalmers to discuss how the scheme can include suitable measures to ensure it is safe and secure.
- 5.15. Various security measures were discussed to ensure the development reduced the risk of crime and anti-social behaviour. These measures will include CCTV across the site, security lighting, security staffing provided by the hotel day and night managers and an air lock system through the new public right of way.
- 5.16. These measures have been incorporated into the final design as now submitted so that the development ensures a safe and secure environment.

Response to consultation discussions

Land Use

- 5.17. It is recognised that the site has since been allocated for a mix of residential, office and retail uses on the Friar Street element. This was brought forward as part of the November 2019 Local Plan. Since the 2019
- 5.18. consent was granted, as will be fully set out in subsequent sections of this report and supporting reports, the site has been tested by the market to try and determine the appetite for the consented uses. The site was marketed by two agents who were able to reach a wide pool of potential parties but ultimately the feedback received has been that particularly the retail element of the scheme, and more so the office element in today's market, is not market facing and simply not attractive to potential developers or tenants. What did come out of the marketing discussions was an interest from several leisure operators and hoteliers and this has resulted in the change of direction in land use.
- 5.19. It is also highlighted that a hotel use is an acceptable town centre use in its own right being within the Core Town Centre area that is highly accessible. The hotel will provide a ground floor bar and restaurant, that is open to the public, with its main entrance and frontage onto Friar Street. By having the bar and restaurant in this location allows for a strong identity and reinstatement of an active frontage for the town centre.
- 5.20. There are no changes proposed to the land uses already approved at 27 – 32 Market Place which will continue to have a mix of residential, leisure (public house) and retail or other commercial type units within the scheme. The residential element of this part of the site will also continue to generate a contribution towards affordable housing which has been put forward as part of the application.

Design – Massing, height and bulk

- 5.21. A full response to design and townscape matters is set out in the supporting Design and Access Statement.
- 5.22. The proposed scheme has sought to work within the parameters of the consented scheme in respect of massing, height and bulk. The proposed scheme maintains and often has made reductions to the overall height of the development through the reduced floor to ceiling heights needed for a hotel compared to offices.

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- 5.23. In terms of massing, again the majority of the scheme has kept within the massing and bulk envelope already approved. The only instances where there is a minor breach is where the floorplates have been squared off to suit a hotel footprint opposed to residential however the design has maintained a stepped approach as you move up the building and in its footprint to minimise and break up the massing. The design as submitted is not considered to result in any material harm over and above that which already has been granted. Any perceived harm would be more than outweighed by the benefits of the scheme which are set out in this statement.

Design – Heritage

- 5.24. A Heritage Statement has been prepared by Turley, and is submitted as part of this application. Please refer to this report for a further detailed response to the heritage comments received.
- 5.25. The proposed internal and external alterations to the listed buildings at Market Place have already been considered acceptable including the proposed demolition works to the rear. There is also an extensive planning history relating to the works associated with changes of use to these properties as well as the partial demolition works. On this basis, the proposed scheme is considered to again comply fully with the extant permission and continues to be acceptable.
- 5.26. The main heritage concern which has been raised through the community consultation relates to the replacement design of the Friar Street elevation. It is reminded that in terms of principles (wrap over effect and step between the stone and red brick) and materials used, this will remain as per the 2019 consent and should again be considered acceptable. The main differences between the consented scheme and the elevation now proposed is the reduction in glazing and the increased size of the opening through to the public right of way through the site.
- 5.27. The reduction in glazing to the front elevation is considered to be a benefit of the design and better reflects the neighbouring properties at M&S and 23 - 26 Market Place.
- 5.28. The increased opening from Friar Street has been introduced as a response to the location of underground utilities located immediately in front of the existing building. This means that a “clear zone” is required in height and width for future continued safe access to these utilities by the various companies. This has influenced the design approach but has in turn resulted in a distinct and more obvious entrance to the arcade route through the site than the consented scheme. It is a unique and landmark feature of the building that will draw people to the space to engage and enhance its vibrancy within the town centre.

6. Proposals

Proposed Scheme Summary

- 6.1. The proposed scheme involves the demolition of the former arcade building that has been derelict and vacant for approximately 10 years and which provides no active contribution towards the character and vitality of Reading Town Centre.
- 6.2. The proposals then involve the redevelopment of the site to provide an eight storey building, including one level of existing basement for the following:
- 182 bed hotel targeting the 4 star market.
 - Restaurant and bar at ground floor open to the public
 - Hotel gym at ground floor
- 6.3. The proposal will also involve the retention and restoration of the existing listed buildings at 27 – 32 Market Place to provide a mix of commercial units across basement and ground floor level with 8 residential units above. There will be an element of demolition to the rear of 29 – 31 and 32 Market Place however these are non-original elements of the listed buildings.

Hotel

- 6.4. The new eight storey building at 173 – 175 Friar Street will become a hotel with up to 182 bedrooms from first floor level and above. At ground floor the main reception for the hotel will be accessed via the new arcade route through the site with public courtyard area.
- 6.5. The hotel will include a new restaurant and bar at ground floor which is open to the public not just hotel guests. The bar and restaurant will be accessed directly from Friar Street and will reinstate a strong active frontage and identity for this part of the Town Centre which does not currently exist.

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Figure 18 – Proposed hotel building



Figure 19 – Proposed restaurant and bar frontage onto Friar Street at dusk

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Residential

- 6.6. At first to third floor levels of 27 – 32 Market Place, it is again proposed to create 8 residential units. This provision will trigger a requirement for an affordable housing contribution under the adopted policy which is accepted.

Retail and Public House

- 6.7. The existing ground and basement units at 27 – 32 Market Place include 2 x Class E units and 1 x Sui Generis Public House unit. The public house use will be reinstated as part of the proposals at 29 – 31 Market Place. The remaining two units will be refurbished and retained as flexible Class E units to provide an element of retail or other town centre commercial use.

Listed Buildings

- 6.8. The proposals involve the repair and restoration of three Listed Buildings fronting Market Place bringing these buildings back into active use through refurbishment and adaptation. To bring the properties back into an active use, various internal alteration will be required which has been clearly set out in the submitted heritage report, prepared by Turley.
- 6.9. The proposals will involve the removal of 20th Century rear additions to 29 – 31 Market Place and 32 Market Place.

Amenity

- 6.10. Owing to the need to preserve the special interest of the listed buildings, the new residential units at Market Place do not have access to private amenity space. It is however proposed to open up the space to the rear of the listed buildings to create a new public open space which residents will be able to access and use as a form of amenity space.



Figure 20 – Artists impression of proposed new public open space and route through the site.

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Design

- 6.11. The new Friar Street building will be constructed from a light stone and mixed brick to reflect the character of the town centre in particular the appearance of the St Laurence Church. The building will also have new glazed active frontage at street level fronting the public realm. The new building will be stepped from fourth to seventh floor level away from Friar Street and Market Place in a clear 'C' shape to reduce the building's massing and to orientate outlook and protect levels of amenity.
- 6.12. There are no changes proposed to the external design of the listed building on Market Place other than improving their appearance and the removal of 20th Century additions to the rear and the insertion of new windows to the rear at first, second and roof floor levels. Internally, various demolition works are proposed to enable the use of the properties for the uses proposed.

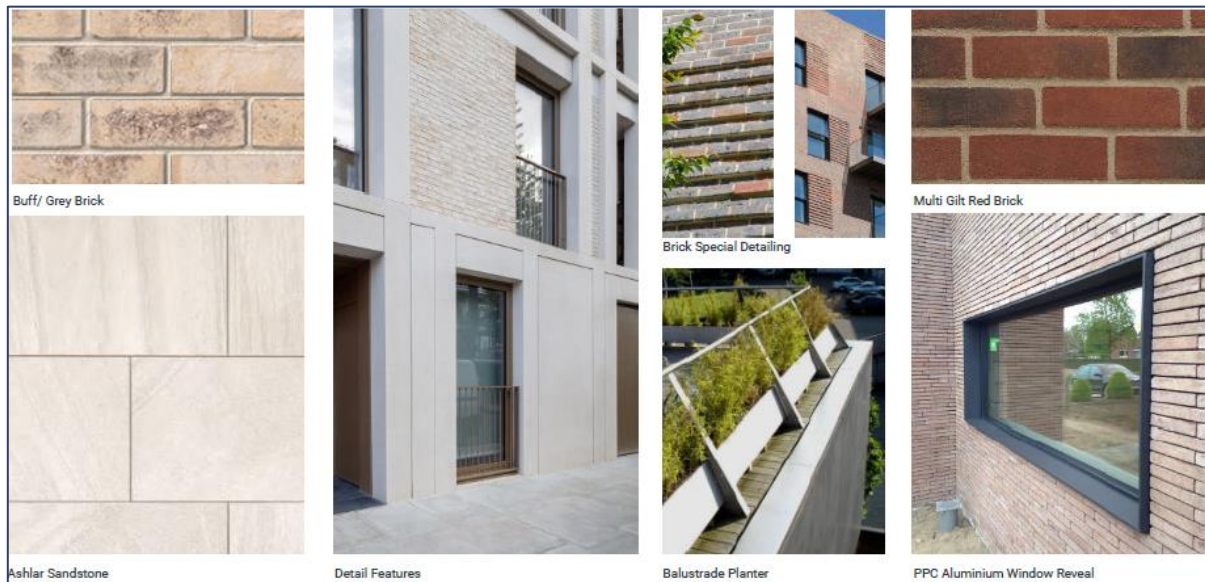


Figure 21 – Proposed material palette for the development

Energy and Sustainability

- 6.13. The redevelopment is also proposing to achieve BREEAM 'Very Good' for the new build retail and office elements and BREEAM 'Very Good' for the refurbishment of the Market Place properties.
- 6.14. The development will be using a fabric first approach to reduce the carbon required both during the construction and operational phases. The scheme will also include renewable energy technologies for both heating and cooling as well incorporating a heat recovery system to minimise the energy demands of the hotel.

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Transport and Parking

- 6.15. The proposed scheme will be car free and each land use proposed will have dedicated cycle parking storage that meets and exceeds the Council's requirements. Cycle parking will be provided in a safe and secure location for all uses with shower and lockers provided for hotel staff.

7. Planning Policy Context

- 7.1. In accordance with S.38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Local Development Plan

- 7.2. For the purposes of the determination of this application, the adopted Development Plan consists of:
- Reading Borough Council's Local Plan (November 2019).
- 7.3. Consideration has also been given to the relevant adopted Supplementary Planning Documents including:
- Affordable Housing SPD (2013)
 - Employment, Skills and Training SPD (2003)
 - Revised Parking Standards and Design SPD (2011)
 - Planning Obligations under S106 SPD (2015)
 - Sustainable Design and Construction SPD (2019)
- 7.4. Consideration has also been given to the Council's Market Place & London Road Conservation Area Appraisal (2007).

National Planning Policy Framework

- 7.5. The National Planning Policy Framework (NPPF - February 2019) sets out the Government's planning policies for England and is a material consideration in determining planning applications.
- 7.6. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). It states, at paragraph 9 that planning policies and decisions should guide development towards sustainable solutions, taking into account local circumstances which reflects the character, needs and opportunities of each area. This is reinforced throughout the plan which encourages the government to do everything it can to encourage sustainable growth.

8. Planning Considerations

8.1. This section of the report provides a detailed consideration of the proposals in light of the adopted Development Plan, focussing on the following main issues:

- a) Demolition
- b) Archaeology
- c) Previously consented uses and marketing of the site
- d) Land use - Hotel
- e) Land use – Retail
- f) Land use – Office
- g) Land use – Residential
- h) Land use - Affordable Housing
- i) Land use – Housing Mix and Density
- j) Land use – Public House
- k) Land use – Loss of Health Club
- l) Design – Townscape and massing
- m) Design – Height & views
- n) Design – External elevations (Friar Street building)
- o) Design – External elevations (Listed Buildings)
- p) Design – Heritage
- q) Design – Internal (Commercial)
- r) Design – Internal (Residential)
- s) Design – Amenity
- t) Design – Access
- u) Amenity
- v) Amenity – Daylight & Sunlight
- w) Amenity – Sense of Enclosure
- x) Amenity Privacy & Outlook
- y) Amenity – Noise, Disturbance and Odours
- z) Amenity – Microclimate
- aa) Air Quality
- bb) Ecology
- cc) Trees and Landscaping
- dd) Drainage & SuDs
- ee) Energy & Sustainability
- ff) Transport & Highways
- gg) Parking
- hh) Waste Management
- ii) Public Right of Way
- jj) Sub station

Scheme Assessment

a) Demolition

- 8.2. The existing site comprises a group of vacant and derelict buildings in a prime location within Reading town centre. The buildings are unattractive and unviable in their current position having been surrounded by hoardings since 2007. The buildings which are vacant include nos. 173 – 174 and 175 Friar Street, 27 - 28 Market Place, 29 – 31 Market Place and 32 Market Place (see Figure 1).
- 8.3. The last known use of the properties on Market Place was around ten years ago prior to the previous planning consent granted in 2007. The proposed scheme will seek to retain the significant majority of these properties with a small level of demolition to the rear of 29 – 31 and 32 Market Place. This part of the proposal has been considered by Historic England to be acceptable on the basis that,
- “There is certainly no harm in removing the 20th Century additions but, as these rear elevations have always consisted of closely parked yards lined within buildings, there is no particular merit in opening this area up to views”*
- 8.4. Paragraph 6.12 of the officer committee report relating to the 2019 consent also confirmed that the Council had no objection to the removal of modern additions at the rear and that these works would not harm the significance of the listed buildings.
- 8.5. Internal demolition at the Market Place properties has also been considered acceptable by the Council and Historic England as part of the previously consented scheme. The proposed demolition of these parts of the site will allow for the opening up of the rear of the Listed Buildings and is therefore considered to provide a heritage benefit in this respect.
- 8.6. The proposed scheme also involves the demolition of the former arcade buildings at 173 – 175 Friar Street. The majority of the former arcade site has been vacant for approximately 10 years. There was however one tenant still in unit 1 of the Arcade until January 2016, which is evidenced by a tenancy agreement and a Section 25 Notice under the Landlord and Tenants Act 1954. The remainder of the site has been boarded up with the removal of the public route through the site in 2016. The demolition of this part of the site has previously been considered acceptable under the 2019 approval (180358 FUL and 18 0359 LBC) and the 2007 approval (ref: 016033) which should be a significant material consideration in the determination of this application.
- 8.7. No 175 Friar Street is identified within the Market Place & London Road Conservation Areas as being a building of townscape merit. It should be clearly noted that the elevation does not currently provide a positive contribution to the character and appearance of the Conservation Area in its current deteriorated state. The proposal involves the demolition of this building and proposed a design that vastly improves the appearance of the site within the context of the wider area.

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- 8.8. The demolition of the Friar Street building, as per the 2019 consented scheme, has been presented to officers throughout the pre-application discussions and in discussions with Historic England and Cllrs. It has always been advised that its replacement should be weighed against the proposed exemplary design of the replacement façade which should enhance the character and appearance of the Conservation Area. The proposed replacement elevation has been designed to vastly improve the appearance of the site, to be in keeping with the previously consented design as much as possible, and is considered acceptable in this instance.
- 8.9. The demolition of the derelict buildings at Friar Street will allow the site to unlock a number of substantial planning benefits that would otherwise not be created by the site. These benefits include:
- Significant improvement in employment generating floorspace to provide modern hotel, bar/restaurant accommodation;
 - Altered Right of Way to open up the rear of the Market Place Listed Buildings;
 - Opening up of Right of Way will attract more footfall through the site which will also be activated by the main hotel entrance off the new public open space and Right of Way;
 - Reinstatement of historical building line on Friar Street;
 - Significant improvements in energy efficiency, carbon savings and overall sustainability within the new building;
 - New building allows for a transitional high quality design that better reflects the context of the town centre and continues to positively contribute towards the character and appearance of the Conservation Area;
 - Upgrade and improvements to site security and public safety across the site.
- 8.10. In addition to the package of benefits resulting from the demolition, the following elements have also meant that the demolition of the existing buildings will provide an improved redevelopment offer for Reading Town Centre:
- Significant improvement to the condition of existing buildings
 - Works already undertaken to implement the extant 2007 consent
 - Optimisation of the site
- 8.11. It is anticipated that a comprehensive specific Construction Management Plan and Logistics Plan will be required for the demolition of these parts of the site on an individual basis. It is also envisaged that these reports can be secured by a suitably worded condition or within the legal agreement.
- 8.12. Demolition has therefore been fully justified to enable the delivery of a range of benefits that will result from the redevelopment of the site (see Section 10 of this planning statement). The redevelopment of the site will also contribute to the vibrancy of Reading town centre on the basis that it has largely been agreed under the 2019 and 2007 consent.
- b) Archaeology**
- 8.13. Policy EN1 and EN2 relate to proposals in areas of potential archaeology significance. Proposals in areas of potential archaeological significance will require an assessment of the impacts of development to be submission prior to the determination of an application.

- 8.14. The archaeological background and potential of the development site was previously described in a previous desk-based assessment by RPS (2006) that was submitted in support of the previous 2007 consent. The 2006 report specifically addressed the land at 173 – 175 Friar Street where the majority of works was proposed however did not include the properties at Market Place as these did not form part of the application site.
- 8.15. The application site was found to be located outside the northern edge of the likely extent of the Saxon settlement at Reading which was focused around Bridge Street, St Marys Butts and St Mary's Church.
- 8.16. The previous consented scheme involved the excavation of further basement floorspace as an extension of the existing basement. This application was supported by a Desk Based Archaeological Assessment of the site which was undertaken by RPS which looks at the areas of detailed investigations to the rear of 173 – 175 Friar Street.
- 8.17. The decision notice relating to the 2019 consent included a series of conditions relating to further archaeological investigations following a Written Scheme of Investigation required prior to the commencement of development.
- 8.18. This current application seeks to largely retain the existing basement footprint although some minor areas of excavations will be required in order to create connecting corridors for ease of staff movement. As such, an updated Desk Based Archaeology assessment has been prepared by RPS and is submitted as part of this application.
- 8.19. Any further fieldwork or investigations would be undertaken by a suitably qualified archaeological expert in accordance with the appropriate standards and guidance.
- 8.20. The proposed scheme will not therefore have any adverse impacts on the archaeological importance of the site subject to suitably worded conditions as recommended in the previous consent and the submitted Archaeological Assessment. The proposed scheme is therefore in accordance with Policies EN1 and EN2 of the Local Plan.

c) Previously consented uses and marketing of the site

- 8.21. As discussed earlier in this report, since the previous 2019 consent, the site has been allocated in the November 2019 Local Plan under Policy CR14d for the following uses:

“Change of use of listed buildings and development of remainder for residential and/or offices with retail and related uses on the ground floor, retaining the arcade form. Development should:

- *Avoid detrimental effects on the significance of the listed building and the Conservation Area and their settings;*
- *Take account of potential archaeological significance;*
- *Address noise impacts on residential use; and*
- *Address air quality impacts on residential use.*

Between 36 – 54 dwellings plus ground floor town centre uses”

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- 8.22. As set out in our pre-application discussions with the local planning authority, the applicant has been actively marketing the site prior to and following the previous consent in order to find either a developer for the site or tenants for the non-residential elements of the approved scheme.
- 8.23. To demonstrate this, the applicant has provided marketing information from their appointed agents, Savills (Reading) who were instructed in 2017 to advertise the site (173 – 175 Friar Street and 27 – 32 Market Place) through an off market campaign for a period of 9 months, alongside jointly appointed agents Campbell Gordon. This marketing campaign advertised the site with the benefit of the pre-application advice at the time which focused on a residential-led mixed use development including some retail and other commercial uses. This marketing exercise reached 37 parties but resulted in no interest that was taken forward for the site. After the 9 months, the applicant took the view to undertake a more formal open market approach once planning permission was obtained reducing the risk for any future interest.
- 8.24. Savills and Campbell Gordon were then retained to launch the site to the open market with the benefit of the 2019 consent in November 2019. The site details were sent to over 2,400 property developers and investors. Between the joint agents, 35 enquiries were received of which only 7 were considered to be 'firm interest'. Those parties of firm interest undertook their own due diligence including appraisals, site inspections and background research.
- 8.25. Of those 7 interested parties, 4 looked at the site from a hotel perspective and had no intention of building out the site as per the approved uses in the 2019 permission. There was no interest for the consented scheme either as a whole or the Friar Street part of the development with the approved uses. The remaining 3 parties only focussed on the Market Place properties for their conversion and not the former Arcade site again confirming that this part of the site would not be delivered by these interested parties. On the 9th January 2020, the Agents received one offer for the site and this was on the basis of being developed for a hotel. The offer was not accepted by the applicant on the basis that they themselves would like to seek a planning permission for hotel scheme.
- 8.26. The submitted marketing evidence provided by Savills in Reading sets out how the discussions with those 35 parties showing an initial interest in the site highlighted that the 2019 consent was not 'market facing' by including such a high level of office and retail floorspace. A schedule of the enquiries and the feedback received is attached at Appendix 3 of the marketing evidence. The consensus was that with the prevailing market conditions, particularly within the retail market, the primary concern was being able to find an operator to occupy the floorspace therefore making the scheme unviable. This would also be further exacerbated by the current impacts of COVID on the market conditions for commercial schemes.
- 8.27. In total, the site has therefore been marketed for over 11 months (for the uses as consented) with a very low level of interest despite being marketed by two reputable local agents with a wide pool of possible contacts. It can be concluded that the level of interest received was predominately for a hotel / leisure scheme which indicates that this is the market preference for the site being within an accessible location within the town centre. If the site does come forward for a 'market facing' permission (which from our testing of the market is for a hotel / leisure scheme) then the site will only remain vacant and closed off from the town centre as the 2019 permission has been put to the market and found to be unviable in the conditions during 2017 and 2019/2020.

- 8.28. This market testing has therefore driven the change away from the consented uses (and the uses included in the site allocation which was prepared in a different economic climate) towards a hotel scheme for the site at 173 – 175 Friar Street which is an acceptable town centre use in its own right.

d) Land use – Hotel

- 8.29. Paragraph 85 of the NPPF (2019) sets out that planning policies and decisions should support the role of town centres by taking a positive approach to their growth, management and adaption. They should define a network and hierarchy of town centres and promote their long term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries allowing a suitable mix of uses.
- 8.30. The existing site lies within the Central Core of Reading Town Centre area which is described in Policy RL1 and RL2 as the prime focus area for major leisure, cultural and non-regionally significant tourism development. These uses are considered to attract a large level of people and activity into the town centre which is supported. Local Plan Policy CR4 relates to leisure, culture and tourism in central Reading. The policy sets out that the Central Core area will be the prime focus for major tourism development that would attract a wide range of people into the centre.
- 8.31. Despite the ongoing context of the COVID crisis, there is still evidence that the hotel market is strong as they tend to plan for future development in advance. There is also a strong demand and level of interest in the site evidenced through the marketing of the site being the only real interest received from visitor accommodation operators or developers.
- 8.32. The proposed scheme seeks to introduce a new 182 bed hotel following the demolition of 173 – 175 Friar Street. The hotel will be targeting the 4 star operator and discussions are ongoing with a number of interested operators who are not currently active in Reading.
- 8.33. As set out earlier in this statement, extensive marketing of the previously consented uses has been undertaken by several reputable agents. Whilst there has been no interest in the office, retail and residential scheme there has been good interest in the site for a leisure and visitor accommodation type use which has driven the change in direction for the applicant. Given that the applicant has justified the move away from the site allocation, through marketing evidence, and that a hotel use is recognised as being a suitable town centre use under Policy CR4 that will inevitably unlock a substantial package of public benefits, it is considered a hotel use in this location is appropriate and a more market facing response to the site.
- 8.34. The need for a new hotel of a good quality rating in the town centre has also been tested by undertaking a local business survey (run by Instinctif) with local businesses in the Reading area who regularly seek accommodation for clients or other business trips and also some targeted questions in the survey as part of the community consultation. The initial feedback, although discussions will continue throughout the determination process, is that it is often very difficult to find hotel accommodation for business purposes in Reading particularly at short notice demonstrating the consistent high demand for accommodation in the town centre area.

- 8.35. It is also understood that there has been a recent deal for a new film studio only 14 miles from Reading Town Centre as part of the Thames Valley Science Park campus. This new and exciting development will no doubt attract many visitors and have a catalyst for tourism for Reading, and the wider Berkshire area, and increase the demand for visitor accommodation in the local area.
- 8.36. The operation of a hotel within the town centre and adjacent to future residential properties has been carefully considered. The applicant has therefore prepared and submitted a draft Operational Management Plan setting out how the operation and running of the hotel will be managed effectively in order to minimise disruption, noise and any other adverse impacts on surrounding amenity. The plan includes measures to control queuing, smoking policies, waste collections and a taxi policy and who is responsible for each measure or mitigation strategy. It is envisaged that a final Operational Management Plan will be prepared following consent as a condition of any planning permission.
- 8.37. The primary access to the hotel for guests will be via the new public access route through the site or arcade. The hotel will also include a bar and restaurant at ground floor which will be open to the public as well as hotel guests. Access to the bar and restaurant will be directly from Friar Street in order to maintain a key active frontage on this ground floor elevation to comply with Policy CR7 which allows C1 uses in the primary frontages. There will also be a gym at the rear of the ground floor which will be open to hotel guests.
- 8.38. The principle of a hotel at 173 – 175 Friar Street is therefore considered to be entirely in line with Policy CR4 representing a suitable, accessible and available town centre site to assist in meeting current demands and accommodate the anticipated growth in demand for visitor accommodation.

e) Land use – Retail

- 8.39. Local Plan Policy RL1 sets out the hierarchy of the Borough's town centres. Reading is considered the Regional Centre for the Borough where it is identified to see the greatest levels of development and change including intensification. Policy RL2 goes on to set the Borough's target for retail development over the plan period. The policies do not however cover the loss of retail floorspace within the Borough.
- 8.40. Policy CR8 builds on the Borough wide policies to highlight that small shop units make an important contribution to the diversity of the centre which include the arcades. Looking at the supporting policy text the thrust of this policy is mainly to maintain the retail market and offer for smaller units in the town centre being the vitality rather than the character or these units.
- 8.41. The proposed scheme seeks to replace the previous retail use at ground floor with the hotel bar and restaurant fronting onto Friar Street as well as the hotel reception, hotel gym and other back of house facilities. On this basis the loss of former retail (and the perceived loss of retail from the site allocation / consented scheme) has been justified in this part of the Planning Statement and supported by evidence from a retail market expert, Hicks Baker by way of Retail Market Assessment.

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- 8.42. As we have always maintained during the previous scheme and the most recent pre-application discussions with the LPA, the provision of new small retail units in an arcade format is not viable or desirable by the market. This has been clearly set out in the Retail Market Assessment by Hicks Baker which is submitted as part of this application, but has also been confirmed by the marketing evidence by Savills Reading and Campbell Gordon in relation to the 2019 consented uses.
- 8.43. In terms of the retail market conditions, it is clear from the Retail Market Assessment that there is already an oversupply of small retail units in Reading Town Centre which is demonstrated by the high vacancy rates across the centre (being higher than the UK average) but also by the lack of occupancy / demand for existing arcade pitches. For instance at the Kings Walk arcade, there has not been a full 100% occupation since it was built in 1992. Reading has a stock of 403 retail units outside The Oracle and the Broad Street Mall of which 62 are vacant with 30 of those available having a floorspace less than 1,000 sq ft (as at 19th January 2020). This again demonstrates that there is already an oversupply in the small retail unit market with units being vacant and adding additional units to the market would not be a sensible approach.
- 8.44. The Government's lockdown regulations, which have been on and off over the past 10 months, have had a significant adverse impact on the commercial market with many forced closures or financial difficulty of premises or re-negotiation of leases taking place. This is demonstrated by the sharp drop off of the new lease agreements already in 2020 (see para 3.3 of the Retail Market Assessment) which was already in decline during 2019 with only 1 transaction has taken place in 2020 in Reading.
- 8.45. The global pandemic has not only affected small operators but larger companies too, which is well evidenced by the collapse of shopping centre owner Intu who operate many large retail arcade sites in prime areas of shopping areas, Debenhams and Arcadia who have gone into administration. On the basis that larger operators in key shopping areas across the UK are not sustainable in the current retail market, it is not considered that the smaller pitches in less desirable areas would be any less at risk, in fact they are not thought to be at a much higher risk than the pre-COVID world. Whilst it is recognised that the full effect of COVID is yet to be realised, it is certain that the pandemic will leave a lasting effect on the commercial markets who will struggle to recover fully with businesses and retailers choosing to be much more selective in their approach to new premises or growth of their businesses where they can be certain that they will be successful in established areas with high footfall.
- 8.46. The realities of the current market mean that more flexibility to retail is required so that town centres are able to adapt to changes in shopping trends which has partly been recognised through the introduction of the new flexible use Class E. Shopping centres in today's market require an anchor store to attract other retailers to a pitch and without this the retail units will fail. Previously at the Bristol & West Arcade, there was a side door which connected through to the M&S however when this was closed the success of the arcade declined rapidly as there was no longer the footfall to sustain the pitch.
- 8.47. The Retail Market Assessment advises that there is no national anchor retailer which would be interested in this particular location with the Reading town centre as there is no destination point which attracts the footfall required. Retailers are most interested in being located as close to or within The Oracle and supported by the existing anchor retailer that exist. This then means the long term sustainability of any retail, particularly small retail, in this location is a high risk and unlikely to survive.

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- 8.48. The repurposing and flexibility of allowing a restaurant / bar associated with the hotel will allow the frontage to be returned to long term activity as it will be associated with the lease of the hotel. The level of active frontage that this will bring will add to the vibrancy of the town centre rather than seeing the continued vacancy that has faced the site over the past 10+ years. A more active use that will attract a level of footfall as a destination point will act as an alternative form of anchor site that allows people to dwell in the city centre for longer and encourages people to support the existing retail offer including making way for the successful larger anchor sites which are performing well.
- 8.49. In the current and foreseeable retail market, developers will require comfort that their proposed scheme will be viable and deliverable and the only way in which this is achieved is by securing pre-lets on non-residential elements of schemes. The scheme as consented has attracted no retail pre-lets further demonstrating its unattractive position in the market. Instead, the site has attracted positive discussions with hotel operators who are willing to reinstate a lost active frontage through providing a restaurant and bar that will ensure the scheme is built out to actively contribute to the evolving town centre.
- 8.50. The application has therefore justified the loss of retail on the ground floor, particularly when the site has been vacant for ten years and fresh lateral thinking is required in order to bring this site back into active use that can contribute towards the commercial nature of the town centre. It is recognised that small shop units may be nice to have as a feature of the past however these units are not attractive to the market and are preventing the site from being redeveloped for a more appropriate and active use.
- 8.51. To retain the character of the arcade, the public route through the site has been designed so that it is split at ground floor level to appear as individual frontages that would have been characteristic of a shopping arcade. This has been done by splitting the façade of the ground floor into separate blocks with glazing representing active frontage as well as the hotel reception. As discussed during pre-application discussions, it may also be possible to include some signage within the brick work areas that refers to the former Bristol & West Arcade, being a nod to the site's retail history.



Figure 22 – Proposed arcade style ground floor through the site to retain the character and feel of individual units

- 8.52. The proposed scheme has therefore justified the loss of the previous long term vacant retail to provide an appropriate active use that will serve to enhance and transform the site and bring it back into a commercial use within the town centre.

f) Land use – Office

- 8.53. Policy EM3 of the Local Plan relates to the loss of employment land and takes an approach based on the overall level of employment land across Core Employment Areas. Upon review of Policy EM3, the policy allows for the change of use or redevelopment involving the loss of employment uses in Core Employment Areas in exceptional circumstances which are covered in the Policy. These circumstances can include whether the continued use of the site for employment is viable, is the need for alternative uses stronger, is the access to means of transport poor, impact on residential uses, and is there a better need for a more comprehensive scheme.
- 8.54. As part of this application Lambert Smith Hampton's commercial team in Reading have prepared an Office Market Assessment to provide an overview of the current office market and how it relates to the recent marketing exercise of the application site and the consented scheme. This report has been prepared in order to directly respond to the Council's comments at pre-application stage in relation to the loss of existing office and the perceived loss of future office from the site allocation and the consented scheme.
- 8.55. The office market during 2020 was significantly impacted by the effects of the COVID-19 global pandemic and is still ongoing. The effects are still being realised however it is clear there is and going to be a continued change in occupier behaviours and how tenants use their office spaces. Most occupiers have had to incorporate working from home practices or socially distanced work spaces which has meant offices are generally being used less as people work remotely. This is true of small and large organisations which is contributing to the reduced demand throughout the office sector.
- 8.56. During 2020, the office market in Reading saw a significant drop in activity levels and take up although the majority of letting activity took place in the out of town market compared to the town centre. There were only three transactions in the town centre: ISIO at the Thames Tower, Gateley at One Forbury Square and Cellnex at R+. All of these sites are either located around the train station hub area and / or are contemporary purpose built primarily Grade A office space that is attractive for tenants. As can be seen from Table 1 in the office market assessment, the take up in office space in greater Reading has fluctuated over the years with a peak in 2018 that was low prior to and after this year. Currently we understand there is one office development within the town centre that is either on site or about to be on site, which is the Station Hill and Metropolitan / Post office developments which are likely to be ready for occupation by 2024, again adjacent to the train station providing the best access links for employees and visitors.
- 8.57. The office Market Assessment confirms that the occupier demand is focused on the Grade A section of the market. When it comes to relocation of premises, occupiers are now tending to look for accessible and quality space as it helps their business retain and recruit the best staff and the property is often seen as an extension of the company's brand. In 2020, 94% of the greater Reading take up was for Grade A space which is higher than 2018 and 2019 take up most likely again due to the stricter demands, and more quality assurances required of tenants since COVID-19 to know they are making a safer investment.

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- 8.58. The existing site at 173 – 175 Friar Street comprises of very low quality, derelict, unsafe and vacant office floorspace at the upper levels of the building that does not meet modern day requirements. The offices have been vacant for a considerable length of time (approximately ten years which is considered under paragraph 4.3.13 of the Local Plan to qualify as long term vacancy) and would now require significant works and investment to bring the accommodation in line with adopted Building Regulations, sustainability and fire safety standards and to compete with the existing office market. It is also highlighted that much of this original office floorspace has previously been demolished as part of the package of works to implement the 2007 consent. This means that the existing office floorspace is, in relative terms, non-existent nor would it be possible to re-activate it in its current form without major re-building and modernisation works which is not possible. The re-letting of the existing space is not therefore an option and the long term or future use of the site as existing office space is not viable meeting criteria ii) of Policy EM3 to be an exceptional circumstance.
- 8.59. The consented office use has also been marketed by Savills Reading and Campbell Gordon from 2017 for 9 months and from November 2019 until early 2020. Response from the marketing work undertaken were extremely minimal as no developer was able to take on the scheme without pre-lets in place to both the office and the retail spaces. Without these pre-lets in place, there would have been concerns that the lower floors of the building would remain empty and not generate an income for the developer.
- 8.60. In the view of LSH, the consented scheme faces a number of further challenges that, if it were built, would likely limit its attractiveness to the current office market. These challenges include the lack of visible street prominence at the ground floor and the lack of potential synergy between the retail uses and the office uses. If occupiers are investing time and resources in high quality office space, there is an expectation that the property will have an arrival experience or reception that is visually clear and prominent, similar to that of Thames Tower. The presence of retail at the ground floor for a building and floorplate of this size wouldn't necessarily benefit the office use and could leave the accommodation in a secondary position to other competing office schemes.
- 8.61. The building itself if thought to have some limited appeal for offices including deep floorplates and the restriction of natural light can then penetrate those floorplates particularly if an occupier or developer adds partitions across the floors. Other possible issues that LSH consider could include the lack of separation from residential when compared to other competing office uses in the town centre.
- 8.62. Whilst the town centre area is accessible by public transport, it is not readily accessible by car or easily by the road network. The supporting Office Market Assessment advises that occupiers still want and expect an element of parking when acquiring office space in Reading. It is highlighted that all available competing office schemes in the town centre have some onsite parking even if only a small quantity of spaces. The existing site (and the consented scheme) currently has no access to parking on site so would therefore be limited in its market appeal for possible future occupiers. Whilst the site may be accessible by means of public transport, this is not always the desirable by tenants, perhaps even more so now as a result of COVID where less people are using public methods of transportation. Under Policy EM3 therefore, the site can only be given limited compliance with part i) if it were to remain in office use although a hotel use would be fully benefitting from a car free site.

- 8.63. The conclusion of the Office Market Assessment is therefore that the existing site nor the consented scheme are not suitable for the current of foreseeable office market demands. The view is that the site could be put to better use as an alternative commercial type use that is seen to be more market facing, especially given that the site has been removed from the market for around ten years.
- 8.64. It is strongly considered that the submitted marketing evidence along with the Office Market Assessment, and the information in this section of the planning statement, demonstrates that there is no long term prospect of office use either in the form of the existing or consented developments. According to Policy EM3, under these exceptional circumstances a related alternative commercial use or a use which complements the employment use of the area may be considered that would not result in the reduction of jobs.
- 8.65. A hotel use, whilst not a Class E use, is a recognised town centre use and a good employment generator through both direct and indirect forms of employment. Given that the site has been empty, and partly demolished, for around ten years, the site has not provided any level of employment generation and so any future redevelopment of the site for a hotel use would serve to significantly enhance the employment generation of the site in accordance with Policy EM3.
- 8.66. The proposed loss of redundant office floorspace and loss of perceived office floorspace in the site allocation / consented scheme is therefore considered to be justified under policy EM3. This justification involves the fact that the continued use of the existing site as office is not feasible and the marketing of the consented scheme has not resulted in any viable interest coupled with the shortcomings of the site vs the other competing office schemes available on the market. The loss to another commercial and employment generating use that will deliver a substantial number of new jobs compared to the existing and is a recognised town centre use is therefore appropriate and justified in line with Policy EM3.

g) Land use – Residential

- 8.67. Local Plan Policy H1 relates to the provision of housing and sets out a target of at least 15,847 homes in Reading Borough for the period 2013 – 2036. Policy CR6 goes on to set out the criteria that residential development in the central Reading area including contribution to mix, mitigation of noise and air quality impacts.
- 8.68. The Council's Housing Implementation Strategy (2018) sets out that in the twenty years between 1997 – 2017, the Council have been generally delivering well against their housing targets with an overall surplus of 144 units. The Strategy has also identified a 6.6 year housing land supply which is above the NPPF requirement of at least five years. The Council are confident that they will retain a five year housing land supply until around year 12 of their plan period at which point the delivery only fall slightly below to 4.88 years.

- 8.69. As part of this housing land supply, the Arcade site has been referred to as an existing commitment of 14 units (through the continuation of planning permission 06/01560/FUL, which would not come forward in the current market conditions) and as a site without planning permission potentially delivering 53 residential units (although in the Housing and Economic Land Availability Assessment, the number considered is 34) within the first five years of the plan period. The delivery of these units is scheduled for 2018/2019 (27 units) and 2019/2020 (26 units), in the years where the greatest housing delivery rates are estimated under various sites which are already consented or have a resolution to grant. The housing delivery trajectory shows that in these years there is predicted to be 1,220 and 964 homes delivered respectively. Therefore the minor loss of 27 or 26 residential units is very unlikely to result in the Council's housing delivery levels falling to a rate which would put them at risk of achieving their 5 year targets or the local plan becoming undeliverable.
- 8.70. It should also be noted that the identified years in which the plan sets the site to come forward has already passed so the plan has already fallen behind in this regard but in the same context, the recent results of the Housing Delivery Test (2020) show that Reading is exceeding their housing delivery targets by a rate of 141%. This confirms that although some of the allocated sites or identified sites in the Housing Trajectory have not come forward, the Council continue to successfully deliver housing at consistently high rates.
- 8.71. Recent permissions granted by RBC also confirm that there is a strong and steady pipeline for residential accommodation coming forwards including the following sites:

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Site address	Reference number	Number of units	Date approved
Broad Street Mall	182137/FUL	446 homes	March 2020
"Station Hill 3" – Plots E & F, Phase 1	190441 & 190442	538 homes	06 December 2019
Station Hill – The North Site, Phase 2	192032/HYB	750 homes (maximum)	January 2021 (committee)
Station Hill – The North Site, Phase 3	192032/HYB	250 homes (maximum)	January 2021 (committee)
Former Battle Hill Hospital	180319	215 homes	29 October 2018
The Thames Quarter	190809/FUL	335 homes	10 March 2020
Former SSE site	200188	209 homes	Pending determination
80 Caversham Road	182251	620 homes	Pending determination
Huntley Wharf	170509 & 190617	795 homes	13 October 2018 & 10 December 2019
Gas Holder, Alexander Turner Close	190627/FULL	130 units	November 2019 (committee)
Wensley Road	200122/REG3	46 homes	16 December 2020
45 Caversham Road	201420/FUL	40 homes	December 2020 (committee)
Former Reading Family Centre	191659/REG3	41 homes	17 September 2020

8.72. This is therefore a small number of residential units that would not be delivered under the local plan, and would have a negligible impact on the Council's overall housing land supply which given the steady and consistent pipeline is not considered harmful.

8.73. The proposed scheme is again proposing to create 8 residential units within the upper floors of the properties at 27 – 32 Market Place. This has been a consistent element of the scheme since the first pre-application in January 2016 as well as the consented 2019 scheme and has again been presented to planning officers over the course of the pre-application discussions. No objections were raised by officers or Historic England to once again change of use to residential floorspace at upper floors of these properties (page 4, pre-application response dated October 2020).

8.74. It should also be highlighted that there have been previous approvals for the change of use of the upper floors of the properties on Market Place. Most notably is the 2019 consent for 8 units in the same layout as now proposed and the 2013 permission at No. 32 where the change of use from office to residential was granted (ref: 120532). Sleeping accommodation has also previously been considered acceptable at No. 27 – 32 Market Place to create a hotel (C1 use) and it is considered this established the site being acceptable for sensitive uses similar to C3.

8.75. The proposed creation of 8 units again in the same layout as previously consented is considered to be appropriate and acceptable in providing a level of residential use from the site.

h) Land use - Affordable Housing

8.76. Local Plan policy H3 relates to the provision of affordable housing from residential development. For scheme's providing below ten units a financial contribution will be sought equivalent to either 10% or 20% of the housing to be provided depending on the total number.

8.77. In this case, the proposed scheme is providing 8 residential units at 27 – 32 Market Place and will fall into Policy H3's category of between 5-9 units which requires the equivalent of 20% contribution towards affordable housing.

8.78. The Council's Affordable Housing SPD sets out the process for calculating the financial contribution based on the Gross Development Value of the residential element of the scheme and the 50% purchase input that a RP would be able to provide. Under this formula approach, the 8 residential units would generate an affordable housing contribution of £380,000 which is accepted and agreed by the applicant as part of this application.

8.79. The proposed scheme would therefore fully comply with Local Plan Policy H3 and the Council's Affordable Housing SPD.

i) Land use – Housing Mix and Density

8.80. Local Plan Policy H2 relates to density and mix of developments generally. The policy sets out that appropriate density of residential developments will be informed by a range of elements but that net densities below 30 dwellings per hectare will not be acceptable. Policy CR6 relates to housing mix more specific to central Reading developments most notably those over 15 units of which would not apply to the proposed development.

8.81. Figure 4.6 of the Local Plan sets out the estimated size of accommodation type required in Reading across the different tenures. For market properties the demand appears to be in the 2 and 3 bedroom units followed by 4 and 1 bedroom units.

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8.82. Owing to the heritage constraints of the listed building, it is proposed to create 8 residential units within the upper floors of the Market Place properties. These will consist of 4 x 1 bedroom units, 3 x 2 bedroom units and 1 x 3 bedroom unit which is considered a good mix for a town centre location and in order to preserve the significance of the listed buildings. The scheme will also be proposing units that are a requirement for the Borough in particular 2 bedroom and a 3 bedroom unit, therefore providing a contribution towards addressing the demands of the Borough. The mix remains exactly the same as that which was previously approved under the 2019 consent and no objections were raised on this basis.

8.83. In terms of density the proposed scheme will generate a density of 160 units per hectare when taking the Market Place site in isolation (8 units divided by 0.05ha). The density is above the requirement set out in Policy CR6 and above the requirement given for town centre development in Figure 4.5 of the Local Plan however it is within a highly accessible part of the town centre which is considered to be entirely appropriate when also viewed in the context of the need to preserve the listed buildings.

8.84. The proposed 8 units will therefore comply with Policy H2 and CR6 both in terms of mix and density.

j) Land use – Public House

8.85. Local Plan Policy RL6 relates to the protection of leisure facilities and public houses which will be generally retained. Policy CR5 goes on to confirm that a range of complementary evening and night time uses that contribute to the 18 hour welcome will be provided in Central Reading.

8.86. Currently, the site comprises of a vacant public house at no. 29-31 Market Place, formerly known as The Cooper's Arms. The public house has been vacant for in excess of 10 years when the previous tenant vacated and currently provides no active contribution to the existing leisure or community facilities within the Town Centre.

8.87. The proposed scheme will bring back in to active use 260.4 sqm of Sui Generis floorspace at 29-31 Market Place across basement and ground floor levels. The main entrance for the public house will remain from Market Place with the ground floor being the primary sales and seating area. The basement floor will provide ancillary kitchen, store and toilet facilities.

8.88. Upon review of similar uses in the vicinity of the site it is noted that the typical opening hours in Reading town centre vary from tenant to tenant. Largely public houses tend to be open until 11pm during the week and midnight at weekends as follows:

Venue	Opening Hours
The Alehouse, 2 Broadstreet	11:00 – 23:00 Monday – Thursday & Saturday; 11:00 – 00:00 Friday and 12:00 – 20:30 Sundays
The Monks Retreat, 163 Friar Street	09:00 – 23:00 Monday – Wednesday & Sunday; 09:00 – 00:00 Thursday; 09:00 – 01:00 Friday and Saturday
The Grey Friar, 53 Greyfriars Road	12:00 – 23:00 Monday – Thursday; 12:00 – 00:00 Friday & Saturday; Closed Sunday
The Gateway, 31 Greyfriars Road	11:00 – 23:00 Monday - Sunday

- 8.89. Our research shows that there is a strong night time economy in Reading town centre with pubs staying open late into the evening. The proposed public house to be re-provided at Market Place would improve the leisure activity in this part of the town centre. Through proposing operational hours, similar to those that already exist in Reading Town Centre, the proposed Sui Generis use will coexist well with existing and proposed residential uses as this is already an established feature of this part of the core.
- 8.90. The pub unit will also be fitted out to comply with Part E of the Building Regulations, subject to any heritage constraints, to ensure that future residents are not impacted by noise or noise transfer from the Sui Generis unit.
- 8.91. On the basis that there is no loss of a public house, and the scheme will bring back in to use an attractive Sui Generis unit that will operate well alongside the existing and proposed residential uses, the proposed scheme will fully comply with the objectives of policies RL6 and CR5.

k) Land use – Loss of Health Club

- 8.92. Local Plan Policy RL6 relates to the protection of leisure facilities and public houses which will be generally retained.
- 8.93. As set out in our previous application for the consented scheme, building work was commenced in 2007 to implement permission 061033 however was halted in 2008. The works undertaken at the site were not completed and there has been no use of the site as a health club which was confirmed by the February 2016 pre-application written response.
- 8.94. On this basis and in practice, given that there was no use of the site as a leisure facility, there is not considered to be any 'loss' of such a facility. Even if there were an issue on the loss the benefits that the redevelopment of the site will generate would outweigh that loss. In this part of Reading there is greater need for the regeneration of the site rather than the perceived retention of non-existent D1 floorspace which has also been confirmed through the previously consented scheme.
- 8.95. The proposed scheme is therefore considered to be in full accordance with Policy RL6.

l) Design – Townscape and massing

- 8.96. Local Plan Policy CC7 sets out that all development must be of a high standard of design and quality that maintains and enhances the character and appearance of Reading. This includes layout, urban structure, urban grain, landscape, density and mix, scale, detail and materials.
- 8.97. The proposed scale, massing and bulk has been discussed extensively throughout the pre-application discussions with officers and Councillors. This application has sought to work within much of the established design, height and massing parameters that were already approved under the 2019 application.
- 8.98. The submitted Design and Access Statement includes massing comparison images that clearly demonstrate the areas of the building that have been cut back when compared to the consented scheme and the previously discussed schemes. The resultant is that the overall massing of the building will be less prominent in views of the site and owing to its stepped design will appear less prominent particularly from street level.
- 8.99. The upper floors of the new Friar Street building have slightly changed when compared to the consented scheme as a result of the change in use from residential to hotel which requires a more traditional floorplate opposed to being off-set. The regularisation of these upper floors are still set back from the Friar Street frontage from level 4 and have retained a step to this part of the massing from level 5.
- 8.100. In other areas, there are clear reductions in the massing at the upper floors when compared to the consented scheme which will also serve to minimise the bulk and scale of the development.
- 8.101. The various discussions that have taken place with the local community and councillors prior to the submission of this application were generally supportive of the reductions and changes made to the massing at the upper levels. Indeed, this was also noted in the Council's pre-application response which confirmed that the proposals would not visually exceed the consented scheme in terms of height and bulk (page 7, pre-application discussion dated October 2020).
- 8.102. Another key benefit of the scheme is the high standard of design proposed, particularly to the Friar Street frontage where an improved elevation is proposed. The proposed elevation will take references from the adjacent buildings as well as the surrounding townscape to ensure that it fully integrates within the streetscene. A full analysis of the Friar Street elevation is given within the Heritage Statement and the Design and Access Statement
- 8.103. On the basis that the LPA and local Councillors have been broadly positive towards the proposed massing, scale and bulk paired together with the significant public benefits in both heritage and social terms that fully justify the proposed scheme

m) Design – Height & views

- 8.104. Policy EN5 of the Local Plan relates to the protection of significant views with heritage interest. The policy provides a list of important and significant views that will be protected. The proposed development does not sit within any of these views and will therefore have not conflict with this policy.

- 8.105. The proposed scheme will again involve the creation of an 8 storey building, it is not considered that the development will be classed as a 'tall building' under Policy CR10. This was confirmed by officers during the determination of the previous permission.
- 8.106. Notwithstanding the above, it is recognised that the building will be taller than its immediate neighbours and therefore due consideration to its impact has been given to the character and appearance of the area. The proposed building will act as an important building within Reading town centre, improving way finding routes across the town centre and key retail streets to reinstate its contribution to Reading and the Conservation Area.
- 8.107. The proposed height does not exceed the previously consented scheme and in many areas has been reduced in height owing the removal of offices from the scheme that required greater internal floor to ceiling heights than a hotel use. This is demonstrated on the elevations where a red line denotes the consented 2019 scheme and clearly identifies where the height and massing has been reduced.



Figure 23 – Proposed Friar Street elevation showing the reductions in height and massing compared to the 2019 consented scheme.

- 8.108. It is also reminded that the Council have previously approved three separate 8 storey towers as part of the 2008 consent which has been confirmed as setting some parameters for the redevelopment of this site. The towers would sit behind the Listed Buildings, being highly visible from Market Place and from Town Hall Square. It is considered that these towers would have a cumulative adverse impact on St Laurence Church and the Town Hall itself as well as other historic buildings in the surrounding area.
- 8.109. As part of the 2019 consented scheme, officers noted in their Committee Report that,

“The overall height of the proposed building has been set lower than the church tower of St Laurence to maintain the latter’s visual prominence and not detrimentally effect the setting of this and other surrounding listed buildings” (page 30).

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- 8.110. Various other amendments were made during the pre-application discussions relating to the 2019 consented scheme to ensure that the tallest elements of the scheme were set back into the site away from the boundaries to also protect the heritage assets that surround the site and key views.
- 8.111. The scheme as now proposed maintains the height parameters established in the 2019 consent in order to again preserve the setting of the surrounding heritage assets. The main height of the building will sit back within the site, closest to M&S and stepped back from the Friar Street frontage. This will assist in minimising the height of the building when viewed from street level on Friar Street and Market Place which has previously been supported by Historic England during the 2018/19 application.
- 8.112. The key views that were agreed with the Council during the previous application have been updated to show the hotel scheme and CGI images as a comparison are provided below. These are also replicated in the Design and Access Statement at a larger scale.

View 01 – Town Hall Square



- 8.113. View 01 is looking towards the site from the corner of Friar Street and Blagrove Street. The view incorporates the Church to the left, the building to the middle and 172 Friar Street to the right. Town Hall Square and the statue of Queen Victoria are seen in the foreground.
- 8.114. The proposed seeks to maintain a very similar if not lower frontage onto Friar Street where the building adjoins with the M&S building and a continued building line where it joins with 23 – 26 Market Place. The materiality is maintained and the overlapping of the red brick with stone is also brought forwards.

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- 8.115. At the upper levels the key different is that a more massing at fourth floor is visible compared to the consented and this is due to the regular and traditional floorplates required by the hotel compared to the off set and angular floorplates that could have been possible for a residential scheme. It is however highlighted on the below section extract that the siting of this floorplate at fourth floor level is further set back than that which was consented so is arguably less prominent in this respect.

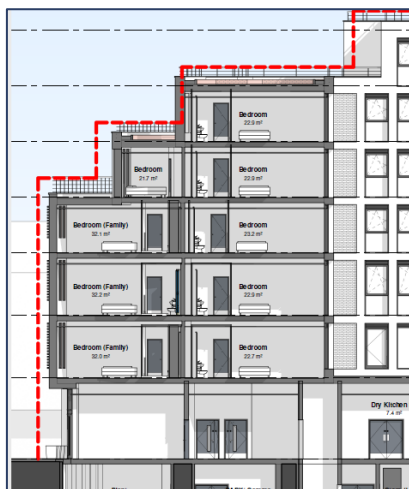


Figure 24 – Proposed section drawing showing comparison of Friar Street frontage compared to the consented scheme in red outline

View 02 – The Forbury



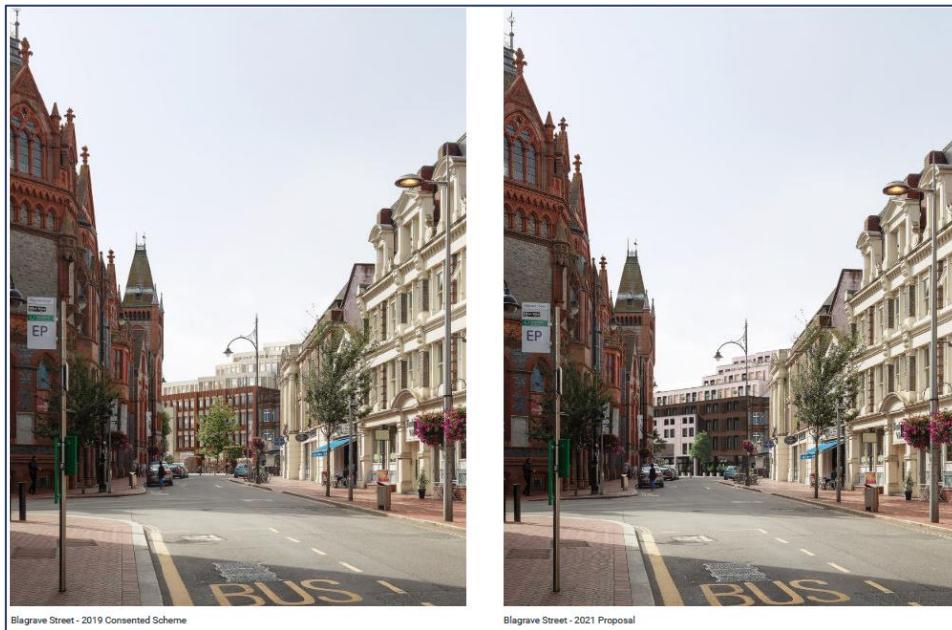
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- 8.116. View 02 is looking towards the site on The Forbury. The view shows buildings on the left of the street and the Church on the right of the street. The view shows the view towards the new Friar Street building which is seen as a modern attractive addition to the view that builds on the traditional characteristics of the neighbouring buildings and the identity of Reading through materials and window alignments.
- 8.117. This view also shows the arrangement of the upper floors which sit back within the plot. When compared to the same view of the consented scheme, it is clear that the visible mass has significantly reduced to provide an overall improvement to the view which is particularly visible at fifth, sixth and seventh floors where the massing appears lower and less visible. Stepping of the massing has also been maintained to keep a level of interest and variation in breaking up the massing at these levels. The proposed fourth floor is more uniform than that which was consented although it is much more set back at this level than consented which is demonstrated in Figure 24 above.

View 03 – Blagrove Street



- 8.118. View 03 is a long view of the site down Blagrove Street which incorporates the Town Hall to the left and a mix of buildings on the right hand side of the street. The view demonstrates that the Town Hall is prominent feature within the streetscene and the proposed development will continue to create no competition between the two.
- 8.119. Compared to the consented more of the lighter stone element is visible in the proposed image but as it retains the window hierarchy and a softer material it does not create any harm to the view. The red brick wrap around is shown as being darker than the consented scheme but it is intended to use a suitable brick that matches the context of Reading and final details of this will be secured by condition. The other change is the reduced number of window openings and level of glazing that is needed to serve the hotel bedrooms above ground floor level fronting onto Friar Street which is considered to be more in keeping with the design distinctiveness of the surrounding buildings within Reading town centre.

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- 8.120. The Friar Street building, owing to its orientation and stepped arrangement at upper levels will retain a large 'gap' between the site and the Town Hall to ensure that large levels of sky are visible further reducing the competition between the two buildings.

View 04 – Market Place



- 8.121. View 04 is looking towards St Laurence Church on Market Place with the properties at 27 – 32 Market Place also visible. The view shows the entrance to Market Way which is marked with a clock tower.
- 8.122. The professional visualisers Hayes Davidson together with Norr Architects have been re-commissioned by the applicant to prepare new accurate visualisations of the revised scheme design from each of the previously agreed viewpoints (4no). However, as a result of a review of the entirety of their projects files, Hayes Davidson have identified a discrepancy in the coordination of the view camera and the view background for the viewpoint positioned within the Market Place. This error has now been corrected due to upgraded QA systems. The result is that proposed new built form within the depth of the Site is now seen in the view from Market Place in a corrected position; and for both the approved and revised schemes in the design and access statement. New built form would again appear rising above the existing roofline of the listed buildings, but now shifted more to the right (not left) of the distinctive form of the Corn Exchange arcade entrance clock tower in this view.
- 8.123. The only visible elements of the proposed Friar Street building is seen to the right of the clock tower but sitting below the top of the clocktower and the monument in Market Place Square. There is also no conflict with the gap in the top of the clocktower which remains free and open when compared to the consented scheme.
- 8.124. The proposal would therefore have a reduced impact to that which has previously been considered acceptable in the existing context to preserve the character and appearance of the Conservation Area.

- 8.125. Again the proposed scheme will be set back from the main facades and only visible in limited views. These views have been fully analysed by the architects as agreed with officers. The views clearly show that the development would be in keeping with the character and scale of the surrounding area.
- 8.126. On this basis that all key views will be protected the proposed height of 8 stories is considered to entirely appropriate for the town centre location and therefore compliant with Policy EN5.

n) Design – External elevations (Friar Street building)

- 8.127. Chapter 12 of the NPPF relates to achieving well-design places and that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 of the NPPF confirms that planning policies and decisions should ensure that developments will function well, add to the quality of an area, be visually attractive, sympathetic to local character and history, establish a strong sense of place, optimise the potential of a site and create safe, inclusive and accessible places.
- 8.128. Local Plan Policy CR2 relates to design in Central Reading and sets out the various design criteria for successful developments to be considered acceptable.
- 8.129. Policy CR7 requires the continuation of active frontages in the primary frontages of the town centre which should be of high visual quality, with a display window or glazed frontage at ground floor in order to contribute to the vibrancy of the town centre and provide interest.
- 8.130. The application site lies in central Reading, where there is a variety of design approaches and many examples of redevelopment coming forwards, especially around the train station. During previous discussions with officers relating to the consented scheme, there were no examples of good architecture in Reading put forward by officers. There is a theme, particularly within the core of Reading town centre that features historical architecture that has likely survived bomb damage mixed in with more contemporary additions that make up the character of the Conservation Area and the wider town centre.
- 8.131. Certainly on Friar Street, the Heritage Report advises that the area surrounding the site was subject to extensive bomb damage that impacted the Town Hall and St Laurence Church and properties on Market Place. As such, large areas of the town centre feature more modern post war designs, which evidenced by the application site itself.
- 8.132. The consented scheme was subject to extensive pre-application discussions spanning two years, and ongoing discussions with officer during the determination of the application to arrive at the design approach that was approved. The current scheme has again been subject to extensive pre-application discussions with officers to discuss the design amendments to the scheme resulting from further investigative work and the changing operational requirements of a hotel.

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- 8.133. The proposed external design has continued to take references from the neighbouring properties, most notably the stone and flint colours of the Church opposite for the upper floors (fourth floor and above) with predominately red brick to the Friar Street frontage (Ground – third floor) and an element of lighter stone to transition from 23 – 26 Market Place all of which have been brought down to ground floor level to form a grounding of the building without compromising the active frontage. The below photomontage demonstrates well that the application site is a key frontage that has the ability to transition between the lighter colours found on Market Place with the darker red brick materials found on Friar Street. This approach was celebrated through the consented scheme and it is again thought the site has the ability to provide a smooth transition through the design approach proposed to create an improved sense of place and identity for this part of the town centre.



Figure 25 – Photomontage of Market Place transitioning through to Friar Street and the change in materiality.

- 8.134. In terms of the fenestration, this again will match the hierarchy of the neighbouring buildings as shown by the image below. Single vertical glazing bars have also been added as per the consented scheme to the red brick element of the scheme so that it takes direct reference from the M&S building adjacent.



Figure 26 – Proposed Friar Street elevation demonstrating window alignment with adjacent properties.

- 8.135. The fenestration also features a strong and clear void to solid ratio to reinforce the 'grid' arrangement that is typically of this part of Reading as noted in Policy CR2. The solid elements will add variation and architectural interest so that it is not a flat elevation as shown below provided through mixed brick detailing.

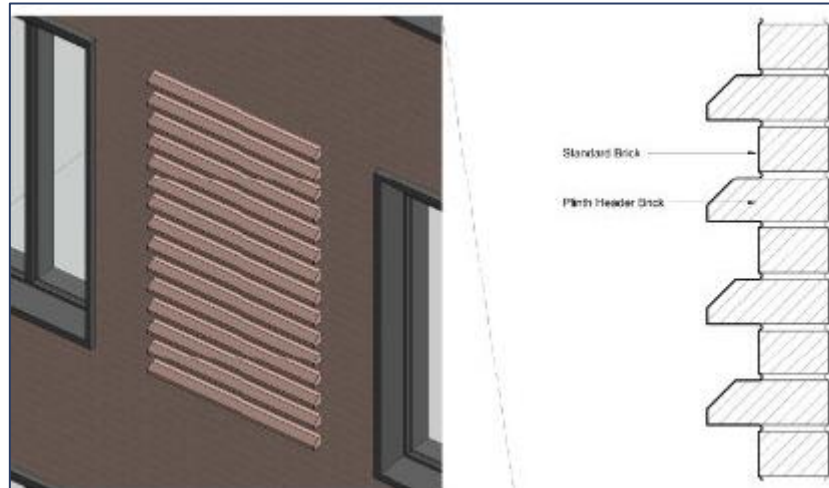


Figure 27 – section showing the brick detailing to the Friar Street elevation

- 8.136. The principal difference in this elevation has been the introduction of a larger entrance through to the public right of way at the ground floor of the lighter stone element closest to 23 – 26 Market Place. This entrance arrangement has been the result of further investigation work into the underground utilities that operate around the site since the previous permission. The result of this investigation has confirmed that there are many utilities that run immediately in front of the site which have been overlaid against the scheme. The proximity of these utilities means that certain clearance zones are required by the service companies in order to maintain access at all times to their infrastructure. These clearance zones are both horizontal (which can be achieved from Town Hall Square) and vertical.
- 8.137. Had the consented scheme's building line been taken right up to the boundary of the site, this would have presented a problem for access to the utility infrastructure. A design solution therefore had to be presented which allowed for the redevelopment of the site in a viable way but also protected the interests of the infrastructure companies and their ability to maintain their services.
- 8.138. As such, a larger entrance as seen from Town Hall Square is considered to be the solution. This will be double height at the boundary but will angled so it sits down to single storey in the similar position of the existing arcade building line. The larger entrance, whilst providing the benefit of protecting existing utilities, is considered to be a unique and landmark design feature that will draw people's attention to the public route through the site making the public aware of the space particularly when compared to the small discrete entrance that was previously consented.



Figure 28 – Proposed entrance to the public right of way (left) and the underground utilities that sit to the front of the site on Town Hall Square.

- 8.139. The undercroft area of the entrance will be attractive and engaging for the public with planting, greenery, signage associated with the hotel and bar and restaurant as well as a contemporary ground floor active frontage that continues round through to the public route.
- 8.140. The design of this entrance has been carefully considered and discussed with officers during pre-application discussions who understand the pressures and constraints that the site has. The design as submitted has been reached through engagement with the Council Officers who recognised the benefits of the larger entrance in drawing people to the site and through to the public right of way to enhance its offer and its sense of being a destination space. One of the recommendations that officers put forward on a previous iteration of the entrance, was to avoid the light stone above “floating” without any grounding and in direct response, the design has evolved to extend the stone element over by one bay width and bring a column down to ground floor level to frame off the entrance.
- 8.141. It is considered that the design approach for this entrance, although taking a more modern and contemporary approach, has successfully responded to the negative (by allowing access to the utilities) and results in many benefits for the development and wider town centre. These benefits will include allowing much more recognition of the space and its function as well as drawing people in to the site to activate the public right of way rather than being just a transient route. The opening up of this entrance on Town Hall Square will also allow for the retention of signage for the adjacent business at 23 – 26 Market Place in a much more obvious and commercially beneficial location as well as adding greening and planting to this part of the Square which is supported in Policy CR2.
- 8.142. On this basis, the proposed scheme is considered to provide a visually attractive external design that takes significant reference from the surrounding vernacular through use of detailed architectural features and suitable materials to comply with Policies CR2 and CC7.

o) Design – External elevations (Listed Buildings)

- 8.143. No changes are proposed to the front elevations of 27 – 28 or 32 Market Place other than general repair and refurbishment works including the redecoration of the elevations in breathable paint in order to preserve the special interest and principal elevations of these properties. A condition survey of the listed buildings has been prepared by Roc Associates which is submitted as part of this application and sets out the areas of the buildings which are in poor condition and where works are proposed to bring them up to a good standard prior to the completion of the remainder of the works to the listed buildings to allow the occupation and operation of the hotel at Friar Street.
- 8.144. Consent is sought to remove the existing architrave pediment and fanlight to the main entrance of the front elevation of 29 – 31 Market Place. The proposed alteration would reinstate the front elevation closer to its historic appearance and this represents an enhancement that will better reveal its significance.
- 8.145. To the rear, there are changes proposed to the elevations of the listed buildings. The main proposed change will be the demolition of the 20th Century additions to the properties. The proposed removal of these elements have raised no objections previously from the Council or Historic England during consented scheme and the current scheme seeks exactly the same level of demolition. The demolition of these elements will open up the rear of these buildings to reinstate their original appearance, providing a heritage benefit in this regard.
- 8.146. Also to the rear, new windows and doors will be installed to the rear elevations of Nos. 27-28 Market Place and there will be a reinstatement of existing openings. These windows / openings have been proposed in discussion with our Heritage Consultants to ensure that there is minimal impact on historic fabric and where possible the reinstatement of existing openings.
- 8.147. Four roof lights will also be installed to No. 32 Market Place in order to enhance the daylight and sunlight levels to unit 43. Again the rooflights have been proposed alongside consultants Turley to ensure that they preserve the appearance of the property. The rooflights will be Conservation style to minimise their appearance however there will be no views of these rooflights from the public realm.
- 8.148. The proposed external elevations of the Market Place properties have been carefully considered as part of the submitted scheme to ensure that the special interest and principal historic fabric is preserved in accordance with adopted policies EN3 and EN4.

p) Design – Heritage

- 8.149. Local Plan Policy EN1 relates to the protection and enhancement of the historic environment. This policy relates specifically to listed buildings, conservation areas, scheduled monuments, historic parks and gardens and other features with local or national significance. All proposals are expected to protect and where possible enhance the significance of heritage assets and their settings. Any harm to a heritage assets should require justification in the form of public benefits.
- 8.150. Local Plan Policy EN3 relates to the enhancement of conservation areas. The special interest, character and architecture of a conservation area will be conserved and enhanced and development proposals should make a positive contribution towards local character and distinctiveness.

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- 8.151. Policy EN6 also relates to new development in historical contexts. In these areas, heritage should inform and shape new development and new development should make a contribution towards the historic character of the area.
- 8.152. This application is supported by a comprehensive Heritage Statement, prepared by Turley. The report follows detailed discussions with both the Council and Historic England across a 2020 as well as those comments made during the previous application. There are four elements of heritage considerations that have been assessed, impact on the Conservation Area, impacts on nearby Listed Buildings, impacts on the Listed Buildings at Market Place and replacement of a building of townscape merit.

Impact on the Market Place / London Road Conservation Area

- 8.153. Part of the site (Nos. 27 – 32 Market Place & 175 Friar Street) lies within the Market Place / London Street Conservation Area which was designated in 1972. The remainder of the application site (173 – 174 Friar Street) falls outside the Conservation Area boundary.
- 8.154. The submitted Heritage Report sets out in full the characteristics of the Conservation Area and the evolution of development within the boundary of the area.
- 8.155. The report notes that the predominant building material is brick, in a variety of colours however the Church of St Laurence which is opposite the application site is constructed from flint. St Laurence Church and the Town Hall overlook the Market Place and Town Hall Square where a large area has been pedestrianised being predominant features in the Conservation Area and streetscene.
- 8.156. During the second world war, this part of the Conservation Area suffered from extensive bomb damage which necessitated the redevelopment of several sites. Instead of reinstating a fine-grained design the area features many unsympathetic building designs which remove historical features or building lines.



Figure 29 - Photograph dated 1893, showing the previous buildings at Nos. 173-4 and No. 175 Friar Street

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- 8.157. The proposed scheme will redevelop the site to reinstate active uses in this location and the uses (hotel, retail, residential and a pub) are considered to be appropriate for this mixed and accessible town centre location. As the site has been vacant for a significant period of time, the re-use of the site is considered to have a positive impact on the appearance of the Conservation Area.
- 8.158. The main concerns in relation to the impact on the Conservation Area have surrounded the replacement of the Friar Street elevation, as No. 175 Friar Street is identified to be a building of townscape merit in the Conservation Area Appraisal, although no justification is given for this within the Conservation Area statement.
- 8.159. Further commentary on the Friar Street elevation is provided in the following sections however there has been a clear design evolution to arrive at the scheme as submitted which was carefully negotiated throughout the determination of the consented scheme and also the 2020 pre-application discussions with officers. The design continues to integrate with the neighbouring buildings and is rooted in its site through the use of materials and architectural details that are reflective of the Conservation Area. It is considered that the elevation will positively enhance the character and appearance of the Conservation Area.

Impact on nearby listed buildings

- 8.160. There are a number of other statutory listed buildings within the Conservation Area and within the immediate vicinity of the site, as shown on Figure 30 below, that have been taken into account through the development of the proposals as submitted and full commentary is provided within the submitted Heritage Report. These heritage assets include:
- Church of St Laurence
 - Town Hall Chamber and Offices and Clock tower
 - Nos. 23 – 46 Market Place
 - Former Trustee Savings Bank, Nos. 34 – 36 Market Place
 - Corn Exchange Arcade Entrance, Market Place / Market Way
 - Queen Victoria Jubilee Statue



Figure 30 – location of designated heritage assets within the vicinity of the application site

- 8.161. The proposal has primarily been discussed in the context of the Grade I listed St Laurence Church and the Grade II* listed Town Hall as they are of a similar height to the proposed scheme and the Council wish to avoid any competition between the proposals coming forward and the special interest of the heritage assets. Other buildings which have been discussed are listed above and the submitted Heritage Report identifies their significance and any impacts that the proposed scheme will have on these buildings.

St Laurence Church

- 8.162. The Church was founded in the 12th Century with various parts of the church having been rebuilt over the years. The church is a long standing feature of Reading and an important element of the town's historic core.



Figure 31 - Grade I listed St Laurence Church

- 8.163. The setting of the church comprises the townscape area of the surrounding Market Place / London Street Conservation Area. The church overlooks the open spaces of Town Hall Square and Market Place which comprises a diverse urban townscape. The Church is considered to be a landmark building and plays an important historical role within this context of central Reading.

Town Hall and Offices and Clock Tower

- 8.164. The Town Hall, Offices and Clock Tower are designed in the French Gothic style by Sir Alfred Waterhouse, built between 1872 and 1875.



Figure 32 – Grade II* listed Town Hall, Offices and Clock Tower

- 8.165. The Town Hall is of significance as a high-quality example of ambitious late-Victorian architecture. Like the Church, the setting of the Town Hall comprises the surrounding Market Place / London Street Conservation Area. The building again is a local landmark for the town centre of Reading and is visible in key views within and into / out of the Conservation Area.
- 8.166. The Town Hall has received Listed Building Consent in September 2017 to provide internal alterations to the building including the creation of a café at ground floor level (ref: 170987/LBC) which is now open and known as The Pantry Café & Kitchen. The entrance to the café sits directly opposite the application site which will complement the site and enhance the vibrancy to the pedestrianised Town Hall Square and route through to the public open space and arcade route through the site.

23 – 46 Market Place

- 8.167. No 23 – 46 Market Place is arranged over four storeys and three bays and is fully stuccoed. The building is entirely in non-commercial use and provides a curved appearance to connect Market Place and Friar Street. The building shows the original building line that would have originally been. The building currently at 173 – 175 Friar Street joins no 23 – 46 Market Place at a diagonal angle clearly marking the removal of an original building line, exposing a blank elevation of 23 – 46 which was never intended to be visible. The proposed scheme will therefore reinstate this original feature building line which has been considered fully appropriate by Historic England previously and has again been welcomed by officers during pre-application discussions over the course of 2020.

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Figure 33 – Grade II Listed 23 – 46 Market Place

Impact on listed buildings at Market Place

- 8.168. Nos. 27 and 28 Market Place were Grade II listed for group value in 1957. A full copy of the listing description is provided at Appendix 5. Nos. 29 – 31 Market Place was Grade II listed for group value in 1973, a copy of the full listing description is provided at Appendix 5. No 32 Market Place was Grade II listed in 1978 and the full listing description is also attached at Appendix 5.



Figure 34 – 27 – 32 Market Place (Grade II Listed)

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- 8.169. The submitted heritage report, prepared by Turley, identifies the significant of these buildings and their contribution to the Conservation Area.
- 8.170. The proposed scheme involves securing a viable new uses for the listed buildings within the application site that have already been granted permission under the 2019 consent and are therefore considered again to be acceptable and appropriate. This includes the selective demolition of the existing modern rear elements of no special interest to better reveal the repaired historic buildings at the rear and various internal alterations to the properties.



Figure 35 – Modern rear extensions to 29 – 31 Market Place

- 8.171. Overall, the approach for the proposed adaptation of the listed buildings has been to retain and repair elements that make the greatest contribution to the heritage significance, such as retaining part of the historic plan form, fabric and features, focussing the greatest level of change within areas already compromised by 20th Century additions and have low heritage interest.
- 8.172. It is for these reasons that the proposed scheme will once again have minimal impact on the listed buildings that form part of the application site. The proposed scheme will seek to preserve and enhance the special interest of these properties in a similar manner to which has already been considered acceptable through previous planning permissions. The proposed scheme is there considered to again be acceptable and in accordance with Policies EN1, EN3 and EN6 and Chapter 16 of the NPPF in this respect.

Replacement of Friar Street Elevation

- 8.173. During the determination and pre-application discussions relating to the consented scheme, the issue of 175 Friar Street being a façade of townscape merit was raised with the requirement to re-provide a high quality standard of design. The façade is considered to be a “non-designated heritage asset” for the purposes of the National Planning Practice Guidance. Officer’s considered that there was no ‘in principle’ objection to the replacement of this elevation however the design of the replacement elevation would need to be of exemplary design standards to balance its appearance within the Conservation Area together with the range of public benefits and historical benefits that will be delivered in accordance with the NPPF.
- 8.174. The existing elevation to 173 – 175 Friar Street is shown in Figure 36 below. The photo was taken in early 2016 and the site has since been completely blocked off with hoardings installed to the entire ground floor frontage to prevent public access. No 175 Friar Street, whilst recognised as a building of townscape merit, does not provide any active positive contribution to the Conservation Area in its current position. It is also considered that the elevation has a more evident negative impact on nearby Listed Buildings in its current poor condition.
- 8.175. The elevation is constructed from a post war red brick design with a form of window hierarchy moving up the building. At street level, there is a light stone used to create a former active frontage and distinguish the entrance to the former arcade. Signage was also used at street level and third floor level however this is now redundant with parts of the signage missing at ground floor level.



Figure 36 – Existing Friar Street elevation in March 2016

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Figure 37 – 2018 application proposals as originally submitted (left) and as consented (right)



Figure 38 – Proposed Town Hall Square view of proposed development

- 8.176. The proposed building will continue to reinstate the original building line (being a clear heritage benefit) and will sit slightly proud of adjacent buildings. Both features which have previously been considered acceptable by officers and Historic England previously. The elevation will once again the wrap over effect of red brick on the right and a lighter stone on the left to form a smooth transition in townscape between Friar Street and Market Place. The elevation overall will have a reduced level of glazing, reflecting the historic designs of buildings in this area, with the fenestration aligning with the neighbouring properties.

- 8.177. The frontage is again broken up into two portions by setting the western section of the building back, and at a slight angle to the eastern section. This creates the sense of two individual but complementary building plots, which echoes the traditional pattern of historic plots along Friar Street and the Market Place. To the left hand side a more inviting legible entrance to the new pedestrian passageway and yard space would again be created, albeit further enlarged as part of the new scheme design. This would be an enhancement to the existing underused and poor-quality route through the Site. As a further change to the approved 2019 scheme, the eastern portion of this (entrance) frontage would be widened by another paired bay to allow for the stone cladding to reach street level and have the effect of visually grounding this element.
- 8.178. In evolving the design of the Friar Street elevation, consideration has been given to the poor state of the existing elevation which has been left for over ten years. It should also be clearly noted that this site has always featured an extensive frontage which is demonstrated in Figure 29 which shows the previous building at the site prior to the second world war. This clearly demonstrates that the site is capable again of having an extensive frontage in this location to reinstate another clear heritage benefit of the site.
- 8.179. The principal difference in this elevation has been the introduction of a larger entrance through to the public right of way at the ground floor of the lighter stone element closest to 23 – 26 Market Place. This entrance arrangement has been the result of further investigation work into the underground utilities that operate around the site since the previous permission which has been fully explained in paragraphs 8.120 – 8.125 above.
- 8.180. The enlarged entrance or archway into the passageway also avoids conflict with the neighbouring property's entrance to the upper floors which sits to the flank elevation and allows the retention of signage for their commercial function. The change to the elevation opens up the relationship with the hotel entrance and the restaurant with the yard space within the site being more generously proportioned which would again allow for a more open and active relationship with the reception and spill out dining from the restaurant.
- 8.181. It is considered that the design approach for this entrance, although taking a more modern and contemporary approach, has successfully responded to the negative site constraints (by allowing access to the utilities) and results in many benefits for the development and wider townscape of the town centre. These benefits will include allowing much more recognition of the space and its function as well as drawing people in to the site to activate the public right of way rather than being just a transient route, particularly when compared to the consented 2019 scheme. The opening up of this entrance on Town Hall Square will also allow for adding greening and planting to this part of the Square which is supported in Policy CR2.
- 8.182. Overall it has been concluded that the well considered scale, massing, articulation, fenestration pattern, detailing and materiality of the new building represents high quality design. This creates new visual interest in the street scene and also serves to break up the apparent scale and form of this development within the context and grain of nearby historic buildings. The new public route at the heart of the site also brings further benefits to the townscape of the area by re-creating the former arcade and traditional network of passageways and yards within the urban block. As a result the significance of the conservation area, and also the listed buildings on and around the site, would be sustained and also to some degree enhanced.

8.183. There are also many identified heritage benefits which have been listed within the submitted heritage report as follows:

- Securing the viable reuse of the listed buildings on Site (which are currently vacant and their conditions deteriorating) in the interests of their future conservation;
- Works of required repair, refurbishment and ongoing maintenance of the historic buildings, funded by their conversion and reuse;
- Reinstatement of a private residential entrance to the front elevation of Nos.27- 28 Market Place;
- Reinstatement of the front elevation of the former Coopers Arms closer to its original appearance;
- Removal of unsympathetic modern extensions to the rear elevations of the former Coopers Arms and No.32 Market Place, to better reveal the historic form and appearance of the listed buildings;
- Reinstatement of traditional timber sash window frames to No.32 Market Place;
- Reinstatement of the rear room of Nos.27-28 Market Place to its original ownership / function;
- Reinstatement of the original proportions of the street vault at basement level to Nos.27-28 Market Place;
- Reinstatement of a staircase between the ground and upper floors of No.32 Market Place, as there would have been historically;
- Improvements to the immediate townscape setting of Nos.23-26 Market Place, Church of St Laurence, Town Hall complex, Nos.33-34 Market Place, Corn Exchange Arcade Entrance, and Queen Victoria Jubilee Statue, through the creation of high-quality new architecture and public realm / pedestrian route on Site;
- Reinstatement of the historic building line along the north side of the Site and around the corner from Friar Street to the Market Place; remedying an unsympathetic post-war change to the historic townscape;
- Delivery of an appropriate mix of commercial and residential uses on Site, accommodated within existing retained historic buildings or high-quality new architecture which has been tailored specifically for its historic context;
- Delivery of improved permeability through the urban block and Site as part of its connections to the surrounding townscape. Including reinstatement of a route from Friar Street to Market Way to the Market Place, and new open rear yard space, that reflects the former arcade and also the historic street pattern; and
- New animation, vitality and visual interest for the street scene and wider townscape.

8.184. The heritage report has also identified that in accordance with Paragraph 197 of the NPPF, there is only a very limited level of harm resulting from the demolition of 175 Friar Street and that the substantial public benefits that would flow from the development as a whole would clearly outweigh any perceived limited harm associated with the loss of the building as part of the wider planning balance.

8.185. The identification and delivery of heritage benefits responds to paragraph 200 of the NPPF that encourages local planning authorities to look for opportunities for new development within conservation areas, and also within the setting of other heritage assets, to enhance or better reveal their significance.

q) Design – Internal (Commercial)

8.186. The hotel will be accessed from within the central courtyard where guests will arrive at the main reception space with a reception desk and self check in stations. Guest can then access the upper floors of the hotel via the lift of stairs from the main reception lobby.

8.187. The reception entrance is also linked through to the bar and restaurant area which fronts onto Friar Street and provides an active frontage to this elevation at ground floor level. Separate access from Friar Street is provided to the bar and restaurant as this area of the hotel is open to the public not just hotel guests. Level access is also provided throughout to ensure the hotel is accessible for all.

8.188. Hotel security will be provided by the management team to ensure that the hotel meets the requirements of the secure by design principles.

8.189. The hotel rooms range from 19 sqm to 32 sqm are all provided with ensuite accommodation to suit the requirements of a 4 star type operator. The majority of rooms will be double although 21 of the total rooms will be suitable for larger occupations (family) and 10 rooms will also be universally accessible. Each room will be served by windows providing sufficient levels of natural daylight and sunlight.

r) Design – Internal (Residential)

8.190. Local Plan Policy H5 relates to the standards required for new housing in the Borough although with a particular focus on new build housing. As the proposed scheme seeks the conversion and refurbishment of existing floorspace at the upper levels of three listed building, it is likely that there will be some flexibility and balance required between preserving heritage assets but also creating a suitable level of accommodation for future residents.

8.191. Policy H8 goes on to cover residential conversion schemes where buildings will be converted into self-contained flats and the circumstances in which they will be acceptable. It should be noted that the internal layouts and configurations have previously been approved under the 2019 consent and there have been no changes to the conversion proposals.

8.192. The Nationally Described Space Standards (NDSS) set out the internal space standards for new residential dwellings in order to provide a high standard of accommodation.

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- 8.193. All units have been designed to meet or exceed these standards as demonstrated by the table below. As the units will comply with the NDSS it is considered that a high standards of accommodation is proposed:

Unit No.	Unit Type	Unit Size (SQM)	National Space Standards Requirement (SQM)
1 (36)	1B1P	49.4	37
2 (37)	2B4P	100.9	70
3 (38)	1B2P	56.3	50
4 (39)	1B1P	49.3	37
5 (40)	3B5P	101.7	86
6 (41)	2B4P (duplex)	83.4	79
7 (21)	1B1P	49.3	37
8 (43)	2B3P	66.0	61

- 8.194. The proposed scheme will therefore provide high quality accommodation with sufficient levels of internal storage in accordance with the Council's requirements and exceeding the NDSS.

s) Design – Amenity

- 8.195. Policy EN9 of the Local Plan sets out that all new development should make provision for appropriate open space based on the needs of the development which can be achieved either through an on or off-site provision, contributions towards provision or improvements of existing facilities. Policy CR3 goes on to set out that proposals will need to make a positive contribution towards the quality of the public realm in the central area of Reading.
- 8.196. As part of the development, it is proposed create a new high quality central public courtyard area to the rear of the Market Place properties and to act as the main hotel reception entrance. This will form part of the reinstated public right of way through the site which will once again connect Friar Street to Market Way and through to Broad Street. The courtyard area will also act as an overspill for the hotel bar / restaurant to create a lively and vibrant place to be. By having the hotel entrance off the courtyard space will also draw people in the open space and activating it as a destination point rather than a transient location.
- 8.197. The open space will include new landscaping and planting in order to make it an attractive and welcoming environment which will contribute to the overall offer of the town centre in accordance with Policy CR3. The opening up of this space in this location will allow the rear elevation of the listed buildings on Market Place to be appreciated and read better which assists in enhancing the opportunities of the historic environment and the significance of these heritage assets again in accordance with part V. of Policy CR3.

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- 8.198. This area has been discussed with the Berkshire Secure by Design officer who welcomes the outdoor area but recommended that it is securely locked overnight in order to prevent any risk of crime or anti-social behaviour. This follows from the previously consented scheme which also included secure access gates at the Friar Street and Market Way end of the site and are once again proposed as part of the development. The hotel will be responsible for locking the gates of an evening with any hotel guests being able to use the secondary entrance through the bar and restaurant on Friar Street during the locked hours.
- 8.199. In terms of the future residential properties at Market Place, owing to the nature of the buildings at Market Place, it is considered more important to protect their heritage status than create dedicated private amenity for future residents in this particular instance. This approach was accepted as part of the previous application.
- 8.200. On this basis it has been important to consider alternative access to outdoor amenity space. The residents of these flats will therefore have access to existing public open space at Forbury Gardens which is only a 5 minute walk from the site. The gardens have recently been renovated and provides a quiet, peaceful location in an urban environment.
- 8.201. The application site is also a 12 minutes' walk from the River Thames which runs to the north of Reading train station. Along the river runs the Thames Path which provides attractive amenity value for future residents. To the north and the south of the Thames are two larger open spaces, Christchurch Meadows and Kings Meadow providing added leisure benefits to the location of the application site.

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Figure 39 – Location of local amenity

- 8.202. The application site is therefore considered to provide a good level of access to open spaces in line with Policies EN9 and CR3 to mitigate the absence of private space provided.

t) Design – Access

- 8.203. Local Plan Policy CC7 requires all developments to provide suitable access to, into and within its facilities for all potential users.
- 8.204. The new building at Friar Street will be entirely accessible for all potential users. Lift access to all floors is provided for both staff and visitor use. There will be three main lift in the hotel reception lobby with a further lift for staff use within the back of house areas of the hotel.
- 8.205. Entrances to the building will be level and level access is provided across the public and private areas of the hotel both internally and externally as shown by the below extract from the Design and Access Statement outlining the key accessibility measures proposed.
- 8.206. It is also proposed to provide 10 universally accessible hotel rooms across the various floors which are generally larger rooms with accessible bathrooms and wider doorways to allow for wheelchair access.

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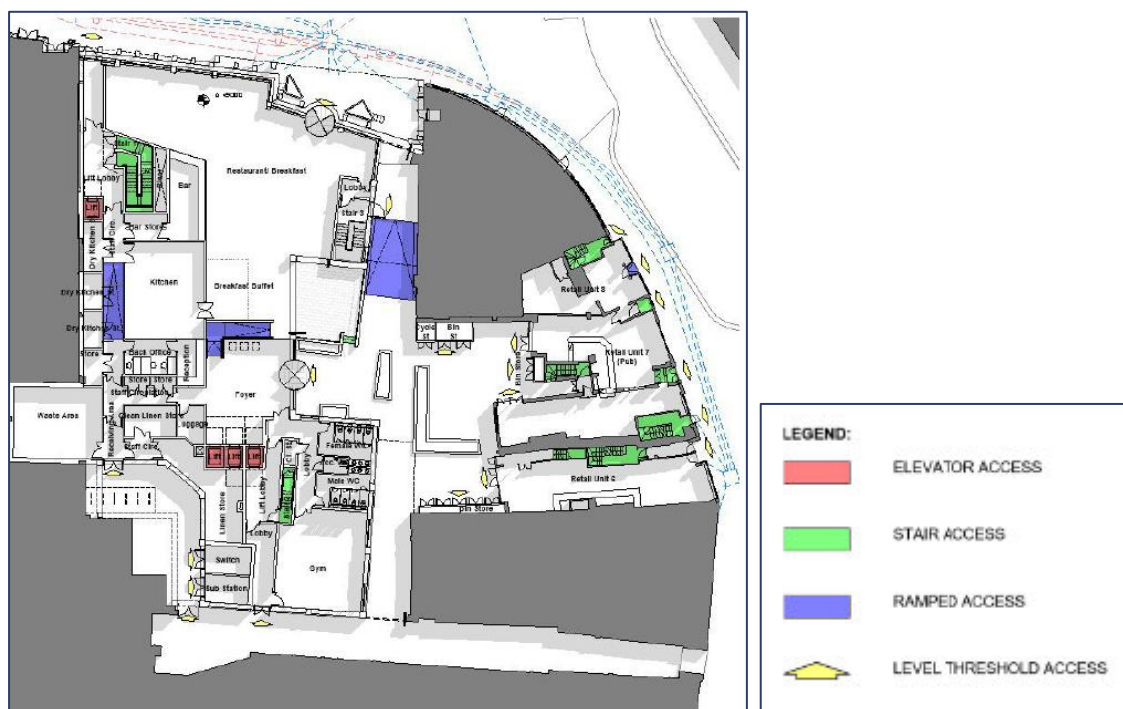


Figure 40 – Proposed access arrangements

- 8.207. In contrast, the residential and retail units within the properties on Market Place will not have lift access owing to the need to preserve the special interest of the listed buildings. No objections to having only stair access to these properties has been raised previously by the Council during the consented scheme. Officer's recognise the greater heritage benefit in retaining the original fabric in this respect.
- 8.208. Level access will also be provided throughout the public right of way across the site as per the current arrangements. Public access will be permitted between certain daytime hours after which point the gates will be closed for security purposes. Secure access will be provided for the hotel staff and guests either via the public right of way, escorted by a member of staff, or via the second entrance on Friar Street during night time hours.
- 8.209. The proposed scheme is therefore considered to be fully compliant with Policy CC7 to provide safe and accessible access for all.

u) Amenity

- 8.210. Local Plan Policy CC8 relates to the safeguarding of amenity and living conditions of existing residential properties or unacceptable living environments of new residential development in terms of privacy and overlooking, daylight and sunlight, overbearing relationship, outlook, noise and disturbance, lighting, vibration, dust and fumes, smell, crime and safety and wind.
- 8.211. The proposed development has been designed to have regard to and not cause material harm to the amenity of existing and future residential tenants. On this basis, a full assessment of each point has been provided below to demonstrate compliance with CC8.

v) Amenity – Daylight & Sunlight

- 8.212. As part of the 2019 consented scheme, a full daylight and sunlight assessment was prepared and submitted, by Delva patman Redler. The results of the assessment assessed both the existing and future impacts on amenity. Whilst there was no harm created to the future amenity the results of the assessment showed that 96% of the 26 habitable rooms at the nearest residential accommodation (36-43 Market Place) would also comply with the BRE guidance for BSC and therefore represented only a minor impact.
- 8.213. The revised design and scheme has been reviewed by the retained Daylight & Sunlight consultant in terms of daylight, sunlight and overshadowing to Town Hall Square. As the dashed line on the proposed drawings illustrate that the current proposals have generally reconfigured the massing of the upper levels 04 to 07 and also that the development has reduced in height, it is recognised that the scheme as now proposed will have a reduced impact on the neighbouring amenity which was previously considered acceptable.
- 8.214. The updated letter report from Delva Patman Redler therefore confirms that the scheme as submitted will continue to generally recognise and observe the intentions of the local plan policy CC8 and the BRE guidance in daylight, sunlight and overshadowing terms.

w) Amenity – Sense of Enclosure

- 8.215. Policy CC8 requires a separations distance of 20m between dwellings to protect residential amenity. Owing to the revised design approach taken for the Hotel building which now sits in a deeper “C” shape, the minimum separation distance of 20.3m can be achieved between the hotel and the residential units at the upper floors of Market Place.
- 8.216. During the pre-application discussions relating to the previous scheme, amendments were suggest and subsequently made by the applicant to Unit 37 and 40 within Market Place to create a 2B4P and 3B5P unit respectively. These units then because triple aspect having both views towards Market Place and to the rear which has again be included into the proposals at Market Place. This time however, the new building at Friar Street will sit further away than the consented scheme allowing for a reduced sense of enclosure and an improved sense of openness with the introduction of a public open space.
- 8.217. All other units will also have views to the Market Place as well as to the rear of the buildings. In line with previous officer comments, this will ensure that there is no sense of enclosure to these units.
- 8.218. It is considered that the proposed scheme will continue to be acceptable to ensure the scheme avoids any sense of enclosure. The proposed scheme is therefore considered to be in accordance with Policy CC8 to protect future residential amenities.

x) Amenity - Privacy & Outlook

- 8.219. Policy CC8 requires development to avoid any adverse harm to the living environment of existing or new residential properties, including privacy and outlook.
- 8.220. Owing to the tight knit urban environment, the proposed design has been careful to avoid any adverse impacts to existing or future residential amenity.

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- 8.221. The proposed properties to the Market Place properties will have outlook to both the Market Place and the rear of the buildings with many of the units being triple aspect. The level of outlook to these properties is considered to be of a high standard.
- 8.222. The Market Place properties will face the eastern elevation of the hotel which is proposed to be a mainly brick but punctuated with some glazed windows to serve bedrooms but these are sited over 20.3m from the nearest window of the Market Place properties and between 26.7m and 29.2 at the furthest point. The retained separation distance and the modifications made to the massing and shape of the building, compared to the consented, which is now much more set back and in a deeper “C” shape will allow for a better level of outlook to the Market Place properties and retained levels of privacy.
- 8.223. In the consented scheme, it was proposed to introduce office accommodation at floors 1 – 3 which would sit closer to the rear elevations of Market Place. Design interventions were proposed to direct views away from the future residential properties.



Figure 41 – Consented relationship between offices and Market Place properties (left) and proposed 3D image of the hotel building showing the opening up and setting away from Market Place properties (right).

- 8.224. The proposed units at first and second floor of the Market Place properties will instead have an improved level of outlook particularly at the rear with an attractive landscaped public open space that is well maintained and active, transforming this part of the town centre as shown by the artist illustration below. Compared to the consented scheme, the outlook would be greatly improved.



Figure 42 – Proposed artist impression of the public open courtyard and improved outlook within the site

- 8.225. The revised design approach therefore will provide an improved sense of privacy and level of outlook to the new units within Market Place to comply with Policy CC8.

y) Amenity – Noise, Disturbance and Odours

Acoustics

- 8.226. Paragraphs 180 and 182 of the NPPF sets out the national policy in respect of noise and states that planning policies and decisions should ensure that new development can be integrated effectively and where any adverse effect is identified then suitable mitigation measures should be provided,
- 8.227. Local Plan Policy EN17 relates to proposals involving noise generating equipment which should be at least 10dBA below the existing background noise levels at the point of the nearest sensitive receptor.
- 8.228. As part of this application, an updated acoustic assessment has been prepared by RBA Acoustics. The report has established the background noise levels at the site using three positions across the site including the Friar Street façade, the Market Place façade and one position internally within the site overlooking the rear podium roof. In line with Policy EN17, the report recommends that any plant is 10 dB below the background noise level for all operating plant at 1m from the nearest noise sensitive façade. This approach was found to be acceptable during the consented scheme.
- 8.229. The results of the background noise survey has informed an assessment of the external fabric of the building, the internal fabric of the building (particularly between separating floors), traffic noise impacts and plant noise emissions criteria in accordance with the relevant British Standards, IEMA Guidelines and the WHO Guidelines.

- 8.230. The conclusions of the report have found that the proposed development would create high standard of accommodation for all uses proposed in accordance with Para 182 of the NPPF and Police EN17. It is envisaged that suitably worded conditions could secure the requirement for further details of acoustic attenuation where required.

Disturbance

- 8.231. One of the points that was raised during the community consultation with local residents and amenity groups was the possible impact of disturbance relating to the hotel on the surrounding amenities of local residents with particular reference to the future residential occupiers at Market Place.
- 8.232. In direct response to this query, a draft Operational Management Plan has been prepared to set out the management procedures that will be in place at the hotel to ensure that there is no disruption to the neighbouring residents and the hotel remains a good neighbour.
- 8.233. In addition, as a result of the discussions with the Secure by Design officer, gated access has been included within the design at the Friar Street and Market Way end of the public right of way, which means that the public open space and arcade route through the site will be closed overnight to reduce any risks of crime. The closure of this space will also allow for reduced noise or disturbance for the future residents in Market Place with hotel guests either accessing the hotel through the Friar Street entrance during these hours, or being escorted to the hotel reception by a member of staff.
- 8.234. The bar and restaurant at the hotel is proposed to be open from 7AM – 11PM including the outdoor terrace (although in reality this will be used in the warmer summer months only). There will also be a “winding down” period in relation to bar sales and kitchen use to limit the operational period of these areas and to minimise noise disruption.
- 8.235. In terms of servicing, this will take place mostly from Market Way although there is likely to be minimal daily deliveries associated with both the hotel generally and the restaurant / bar some of which will not be in addition to existing deliveries taking place in the surrounding highways network. Waste will be stored internally within the building again to avoid any noise disruption such as bottle waste storage from the bar. Deliveries will be maintained in line with the Council’s guidelines in order to minimise disturbance for existing and future residential amenity.
- 8.236. The proposed hotel and associated restaurant / bar will be managed effectively in line with a final Operational Management Plan in order to ensure that the hotel remains a good and considerate neighbour for existing and future residential properties in line with Policy CC8.

Odours

- 8.237. In recognition of the hotel including a kitchen to serve the restaurant, an Odour Assessment has been prepared by Southdowns Environmental in support of this application. The kitchen will be located at ground floor level and required kitchen extract equipment being ducted to roof level where it will be dispersed at 1m above the ridge level. As the surrounding buildings are mostly five storeys the level of dispersion is considered to be better than if the surrounding buildings were at similar height and is therefore classed as being good.

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- 8.238. The kitchen will serve breakfast (06:30 – 10:30h), lunch (12:00 – 15:00h) and dinner (17:00 – 23:00). The menu is expected to include mainly traditional British dishes that involves baking, broiling, frying, microwaving and roasting. The odour content is therefore expected to be light to medium and moisture content heavy. The odour and grease content is expected to be high. A high level of odour control is therefore recommended.
- 8.239. Based on the risk level, odour control may include:
- Fine filtration or electrostatic precipitator (ESP) followed by carbon filtration;
 - Fine filtration or ESP followed by UV ozone system to achieve the same level of control as the first option.
- 8.240. The proposed extract system includes a primary and secondary grease filter, a final bag filter and odour control which could be in the form of a carbon filter or UV ozone system. The final design of the extraction system will be specified at the detailed designs stage.
- 8.241. Provided that the final flue design incorporates suitable mitigation and maintenance, then it is considered that the proposed development will not harm the amenity at nearby receptors or at receptors introduced by the proposed development.

z) Amenity – Microclimate

- 8.242. A Pedestrian Level Wind (Desk Based) Assessment has been prepared by RWDI and submitted in support of this application. The report confirms that the scheme as proposed would not substantially change the height or massing from that of the approved scheme, with amendments to the extent of the external walls and roofline. These amendments would reduce the height of the hotel slightly compared to the extant scheme and would vary the configuration of the external walls, however the profile in both would remain similar.
- 8.243. The height and massing of the scheme as now proposed would remain similar to that of the approved scheme and as such would not increase the exposure of the development to the prevailing winds. Wind conditions would therefore be expected to remain similar to those set out in the 2018 technical report provided by RWDI.
- 8.244. Adjustments to the eastern elevation would increase the distance between the revised scheme and the neighbouring existing buildings to the east, increasing the width of the pedestrian thoroughfare through the site. Increasing the width would reduce the potential impact of wind accelerating as it is squeezed between the buildings. Wind conditions on thoroughfares would therefore be expected to remain suitable for the intended use.
- 8.245. The introduction of colonnade's on the northern elevation and a recessed area outside the hotel foyer would provide inherent shelter to the restaurant and hotel entrances respectively. Similarly, an entrance identified on the approved scheme as being windy is not present on the scheme as now proposed as such all entrances to the revised scheme would be expected to have suitable wind conditions for the intended use.

- 8.246. A new terrace amenity area is proposed to serve the hotel bar / restaurant. This terrace is surrounded by the massing of the new building and the neighbouring buildings which is expected to provide sufficient shelter from prevailing winds. The terrace is therefore expected to have suitable conditions for use during the summer season, the target conditions for an amenity space.
- 8.247. Likewise, the proposed cycle parking area at the south-western corner of the site would similarly be well sheltered by the surrounding massing with no through route for wind. Wind conditions are therefore considered to be suitable.
- 8.248. In summary, the revised scheme is considered to represent an improvement in microclimate terms through the changes to the footprint and massing of the building, the scheme will create suitable conditions for the intended uses and the safety of the public when moving through the new public right of way. There are also no instances of strong winds with the potential to be of a safety concern for more vulnerable pedestrians or cyclists that would be expected again similar to the consented scheme. No further testing or mitigation measures are therefore proposed.

aa) Air Quality

- 8.249. Paragraph 181 of the NPPF states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA) and Clean Air Zones, and the cumulative impacts from individual sites in the local areas. Opportunities to improve or mitigate air quality should also be identified.
- 8.250. Local Plan Policy EN15 sets out that developments should have regard to the need to improve air quality and reduce the effects of bad air quality. In 2006, the Council declared six AQMAs, which were replaced with a single AQMA in 2009. Reading town centre is within the heart of the AQMA which is supported by updated guidance in the Council's Air Quality Action Plan which was published in 2016.
- 8.251. In support of this application an Air Quality Assessment has been prepared by Southdowns Environmental and is submitted as part of this application. The nearest sensitive receptors have been identified within the report which have the potential to be affected by changes in air quality. There are a number of residential receptors in the vicinity as well as commercial and industrial premises which also may be sensitive to dust. The report has found no ecological receptors within 200m of the development site and have therefore been scoped out of the assessment.
- 8.252. The assessment has been produced in consultation with the Council agreeing a methodology used in the report as well as a review of the Council's annual status and data collected by the Council. The nearest NO2 monitoring station is located on Caversham Road (1KM to the north of the site) and the nearest urban background continuous monitoring location is located 1.8KM east of the site at reading Old Cemetery. The overall baseline data indicates that annual NO2 and PM10 concentration objectives are being met at the development site, and will continue to do so.

- 8.253. The Air Quality assessment has also looked at the potential of dust emission magnitude and the sensitivity of the area for human health. Table 6.3 of the report confirms that there is likely to be a low – medium risk of dust soiling without mitigation throughout the construction phases and a low – negligible risk for human health. Mitigation has been proposed within the assessment to confirm that NRMM standards will be met and to confirm monitoring methods and compliant response procedures will be adopted (full mitigation measures are provided in Table 8.1 of the report).
- 8.254. There will be a negligible impact on local air quality from construction and operational traffic, due to the very low number of vehicle movements during construction and operation. No mitigation is therefore necessary related to this element.
- 8.255. The energy plant within the proposed development is likely to have a negligible impact on local receptors. If the final specification for the plant has an emission rate greater than 5mg/s, assessment of the chose boiler plant may be required.
- 8.256. Overall, the air quality effects from the proposed development are considered to be not significant and there is no conflict with the relevant national or local plan policies.

bb) Ecology

- 8.257. Chapter 15 of the NPPF relates to the conservation of the natural environment. Paragraph 175 of the NPPF sets out that when determining planning applications, local planning authorities should support applications where the primary objective is to protect and enhance biodiversity which includes improvements and net gains for biodiversity.
- 8.258. Policy EN12 of the Local Plan relations to biodiversity and the green network. New development should demonstrate how the location and type of green space and landscaping are arranged. Sites should not result in a net loss of biodiversity and geodiversity looking to provide a net gain for biodiversity wherever possible.
- 8.259. As part of this application, an updated Bat Survey Report has been prepared by CSA Environmental. A detailed external and external inspection of all buildings was originally completed on the 1st and 14th November 2017, which was subsequently updated on the 25th August 2020. Following these inspections, the structures were categorised with a negligible potential of bats at 173 – 175 Friar Street but evidence of bats were found at 27 – 32 Market Place.
- 8.260. Two dusk emergence and a single pre-dawn re-entry surveys were undertaken to confirm the presence / likely absence of roosting bats in relation to 27 – 32 Market Place. These surveys were then updated on 26th August 2020, 7th September and 28th September 2020. The results of the survey showed the presence of up to 7 minor common pipistrelle day roots within the roof structure of 27 – 32 Market Place.

- 8.261. As works are proposed for the rear of the roof of 27 – 32 Market Place, in addition to the installation of four roof lights, a mitigation strategy has been put in place in order to mitigate the impact on bats which will include the installation of two new bat boxes externally on unaffected sections of the building prior to commencement of the work, a licensed bat ecologist will provide an indication for contractors and other site works, any areas of the buildings that have the potential to support bats will be searched and dismantled under supervision and direction from a licensed bat worker. A license from Natural England will also be required for the works. To compensate for the anticipated loss of a single common pipistrelle roost a minimum of two bat access tiles will also be provided within the new roof once works are completed.
- 8.262. In addition to the access tile provided for mitigation for the loss of the single roost, it is proposed that a minimum of three additional bat access tiles will be installed within the new / existing roof structure of 27 – 32 Market Place to provide additional roosting opportunities for bats.
- 8.263. The proposed surveys and mitigation strategy follows exactly that which formed part of the 2019 consented scheme. The enhancements proposed will also serve as an ecological net gain for the site which is considered an environmental benefit of the proposed scheme that otherwise would not be brought forwards. The proposed scheme is therefore considered to be in line with the requirements of paragraph 175 of the NPPF and Policy EN12 of the Local Plan.

cc) Trees and Landscaping

- 8.264. Policy EN14 of the Local Plan relates to tree, hedges and woodlands. On the site at the moment, there are no existing trees, hedges or woodlands however as part of the proposed scheme it is proposed to introduce as much green and soft landscaping as possible in order to make the site attractive and enhanced environment for the public, the character of the town centre but also wildlife and biodiversity.
- 8.265. It is proposed to incorporate areas of green roofs at upper levels of the Friar Street building where available as well as adding planters behind balustrades again at upper levels.

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Figure 43 – Proposed indicative design for the central courtyard area (left) and proposed green roofs (right)

8.266. The proposed scheme will also provide new areas of hard and soft landscaping within the public right of way access route through the site and entrance to the hotel and it is anticipated that full details of this landscaping will be finalised at the detailed design stage.

8.267. A full hard and soft landscaping plan is anticipated to be provided as part of the pre-commencement requirements. The proposed scheme is therefore considered to comply with Local Plan Policy EN14.

dd) Drainage & SuDs

8.268. Local Plan Policy EN18 sets out that development will be directed to areas at lowest risk of flooding the first instance and all major developments must incorporate sustainable drainage systems as appropriate. On this basis, a detailed SUDS report has been prepared by Clancy Consultants and is submitted in support of this application. The reports identifies that the proposed scheme will provide new opportunities to reduce local area flood risk by controlling surface water on site.

8.269. The existing site is currently 100% impermeable and discharges surface water run-off into the public sewer system. The proposed development provides an opportunities to reduce local area flood risk by controlling the surface water. Following the SUDS and water disposal hierarchy it has been determined that surface water will be controlled using green roof areas and flow controls with an attenuation tank storage area within the public walk through area paving before being distanced to the public surface water sewer system.

8.270. The proposed system will be designed to control surface water run-off for all storms up to an including 100 years plus climate change. The proposed scheme has therefore been design to meet the Sustainable Drainage Systems Non-Statutory Technical standards and therefore is considered acceptable in this respect.

8.271. Foul water rates are expected to increase slightly as a result of introducing new development on the site. It is noted that Thames Water will be consulted as part of the application and will confirm that the existing sewer system is capable of accommodating the additional level of discharge, although no objection was raised during the previous application.

8.272. The proposed scheme has therefore been designed to meet the requirements of Local Plan policy EN18.

ee) Energy & Sustainability

8.273. Local Plan Policy CC2 sets out that proposals for new development will be acceptable where the consideration of climate change in relation to the design, layout, energy use, water, minerals and materials has been undertaken. All major and minor non-residential development are also required to meet certain BREEAM standards where possible. Policy CC3 also relates to the measures developments are required to incorporate to adapt to climate change.

8.274. Policy CC4 relates to seeking opportunities for decentralised energy systems in larger developments including non-residential developments of over 1,000 sqm.

8.275. As part of this application an updated outline Sustainability Statement and set of BREEAM assessments have been undertaken and are submitted in support of this application.

8.276. The Sustainability statement confirms that a 'fabric first' approach will be taken to the design and construction to reduce energy demand and carbon emissions. This will include the use of sustainable construction techniques, prioritising sustainable materials, minimising waste generation and maximising recycling. The thermal properties of the building fabric will also exceed the minimum standards within the Building Regulations.

8.277. High efficiency heat generators will provide the heat source for both space and water heating i.e. gas fired condensing boilers, air source heat pumps or a combination of both. Cooling will also be provided by air source heat pumps i.e. variable refrigerant flow type system. A heat recovery system will also be in place through mechanical ventilation in order to conserve energy and heat. Energy efficient lighting will also be provided throughout to minimise electricity consumption while maintaining the desired lighting levels.

8.278. The sustainability statement has also reviewed each renewable or low energy technology and concluded that ASHPs would be the most efficient to serve the site. Consideration to the CHP system has been given however is not thought to be viable for a scheme of this size or energy demand for the use. The site does not also lie within an area where there is an existing heat network and is therefore unable to connect to such a network.

8.279. Three new BREEAM pre-assessments have been carried out by Summers Inman in line with the Council's Sustainable Design and Construction SPD. The following assessments have therefore been undertaken:

- Domestic Refurbishment pre-assessment
- Non-domestic retail refurbishment pre-assessment
- Non-domestic new construction pre-assessment



Figure 44 – Proposed roof plan showing indicative plant layout at roof level

8.282. Local Plan Policy CC6 relates to the accessibility of developments and the intensity of development with the more intense forms of development in the most accessible places of the Borough. Local Plan Policy TR1 sets out that proposed development should contribute appropriately to meeting and promoting the objectives of sustainable transport, travel plans, safe routes to local facilities and services.

8.283. Policy TR3 of the Local Plan also sets out that development will only be permitted where the development will not have a material detrimental impact on the functioning of the transport network, the proposal would not affect safety including pedestrians and cyclists, details of servicing and consideration of the highway are provided.

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Trip Generation

- 8.284. A full Transport Statement has been prepared by iTransport Planning and is submitted as part of this application. The transport statement analyses the transport demands of all future land uses that form the development using results from the TRICS database and provides a comparison to the consented scheme.
- 8.285. The application site lies within a highly accessible location within the town centre of Reading. It is within walking distance of a significant level of shops, services and facilities. It is not envisaged that there will be substantial additional levels of vehicle trips to and from the site, other than for servicing and deliveries.
- 8.286. The anticipated increased level of trips is likely to be dominated by walking and cycling being in a very accessible part of the town centre. These will be from hotel guests, residents, staff and visitors to the site.
- 8.287. The results of the trip generation analysis shows that the proposed hotel will result in a total of 94 trips during both peak hours, the 8 residential units will result in 5 and 6 trips during the AM and PM peaks respectively. When compared to the consented scheme the results show that there will be an overall reduction of 16 person trips in the AM peak and 19 person trips in the PM peak. The proposed retail uses at Market Place will result in a reduction of 59.5% fewer trips compared to the consented.

TRIP RATE	AM PEAK (0800-0900)			PM PEAK (1700-1800)		
	IN	OUT	TOTAL	IN	OUT	TOTAL
<i>Proposed - Retail</i>						
The existing retail element is 1603m ² and the proposed is 649.3m ² hence, the development proposals will result in 59.5% fewer person trips than existing or consented.						
Notwithstanding the substantial decrease in retail use at the site, it is evident that the site is situated in a highly accessible town centre location, with a range of existing retail and commercial destinations in close proximity of the site. As such it is envisaged that person trips associated with proposed retail use would be drawn from existing trips already being undertaken in the locality and it would be unlikely that the development would attract additional person trips to the area. This approach is in line with the previous transport submission and subsequent consent (<i>please refer to para 1.6, Chapter 1 of this Analysis</i>).						
<i>Proposed - Hotel</i>						
Trip Rates / room (182)	0.178	0.339	0.517	0.307	0.211	0.518
Person Trips	32	62	94	56	38	94
<i>Proposed - Residential</i>						
Trip Rates / apartment (8)	0.080	0.396	0.476	0.469	0.209	0.678
	1	3	5	4	2	6
<i>Consented Person Trips</i>						
Previously Consented	90	24	114	28	91	119
<i>Residual</i>						
<i>Proposed (hotel+residential) – Consented</i>						
	-57	41	-16	32	-51	-19

Figure 45 – Results of Trip Generation assessment

- 8.288. A framework travel plan for each of the uses proposed has also been prepared by iTransport Planning in support of this application, to ensure that the future uses and occupants of the development are encouraged to choose alternative and more sustainable methods of transport to access the site. It is anticipated that a final travel plan can be secured by condition to deal with each land use in further detail and personalised to an end occupier.
- 8.289. It is therefore envisaged that the existing transport and highways network will be able to accommodate the expected person trips and is therefore considered to comply with Policies TR1 and TR3.

gg) Parking

Car Parking

- 8.290. Policy TR5 of the Local Plan sets out developments should provide car parking that is appropriate to the accessibility of locations within the Borough.
- 8.291. The application site is located within a highly accessible location and is in close proximity to a number of methods of public transport as well as Reading Station which will benefit from Crossrail in the future. The nature of the site being car free was supported by officers and RBC Transport during the previous consented application on the basis that future residents were unable to apply for a parking permit which is again accepted as part of this application.
- 8.292. The submitted Transport Statement further justifies the car free nature of the scheme in the context of its location. The proposed scheme is considered to comply with the Council's Parking Standards and Design SPD.

Cycle Parking

- 8.293. Policy TR4 of the Local Plan sets out that developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development. Cycle parking should be provided as part of developments in accordance with the Council's standards.
- 8.294. The Council's Revised Parking Standards and Design SPD also sets out the requirements for cycle parking within the Borough. Cycle parking is considered to be essential for most developments and should support the reduction in vehicular parking (page 20 of the SPD).
- 8.295. Within the centre of Reading, the following standards would apply:
- Class E (formerly A1, A2, A3) – 1 space per 6 staff and 1 space per 300 sqm
 - Sui Generis (formerly use class A4) – 1 space per 6 staff and 1 space per 300 sqm
 - Class C1 – 1 space per 6 staff
 - Class C3 (1/2 bed) – 0.5 spaces
 - Class C3 (3+ bed) – 1 space
- 8.296. The proposed scheme therefore has a requirement for the following cycle parking provisions:
- Class E / Sui Generis – 3 spaces

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- Residential – 4.5 spaces
- Hotel (assumed 30 staff) – 5 spaces

8.297. As such, sufficient cycle parking spaces will be provided in lit, secure and overlooked locations as demonstrated in the image below. The commercial bike stores for Market Place are internal (Class E at ground floor and Pub use in the basement) with the residential provision within the rear courtyard of the buildings and the hotel's provision is within the service yard area. Staff changing for the hotel element have also been provided on site within the back of house areas.

8.298. The cycle parking will mostly be in an accessible location save for the provision at 29 – 31 Market Place which is at basement level and only accessed via stairs. This approach is consistent with the previously consented scheme and will ensure there is no compromise to the primary sales area of the pub located at ground floor, making the unit more attractive for an end occupier. There also remains the need to preserve the listed building and this would be affected through the installation of a lift. The proposed location of the cycle parking is therefore considered to be acceptable in this context.



Figure 46 – Proposed cycle parking provision locations

8.299. The proposed level of cycle parking therefore meets the Council's requirements and will encourage more sustainable levels of transport throughout Reading. The proposed scheme is considered to fully comply with the Council's Parking Standards and Design SPD in this respect.

hh) Waste Management

8.300. Local Plan Policy CC5 sets out that developments should include measures to minimise the generation of waste in the construction and operational stages of the scheme. Scheme's should include adequate, well-designed spaces to facilitate storage, reuse and recycling and composting.

Construction Management

- 8.301. It is anticipated that a demolition method statement together with a Construction Management Plan will be required for the redevelopment of the site. The plans will set out in further detail how the construction phases will be undertaken along with the management and general handling of waste in a sustainable manner.
- 8.302. We therefore would consider it reasonable for the LPA to secure a Construction Method Statement by way of planning condition as per the previous consent.

Delivery and Servicing

- 8.303. There is no vehicle access to the site and it is therefore proposed to utilise the existing on-street loading opportunities within the vicinity of the site (Market Place, Blagrove Street and Friar Street) which is also consistent with the previously consented scheme. The submitted Transport Statement sets out the opportunities surrounding the site for deliveries and servicing requirements at Figure 4.5. The existing loading bay on the western side of Market Place is considered to be the preference as it allows the vehicle to load and unload in close proximity to the site although is restricted between 07:00 – 11:00 and 16:00-19:00. Should any deliveries be required during these restricted hours, alternative bays on Blagrove Street and Friar Street could be explored for alternative use.
- 8.304. The hotel manager will ensure that service deliveries are staggered to minimise demand on the loading bays and road network, avoiding at all times peak hours.
- 8.305. The hotel use is likely to require a range of daily deliveries of between 3- 5 movements associated with cleaning, laundry and linen and then between 2-3 movements associated with food and drinks relating to the bar / restaurant. Some of these trips will not be new to the highways network however as companies serve multiple sites. A range of vehicles will also be required to serve the site including transit vans, 7.5 tonne vehicles and bigger 18 tonne vehicles in some cases.
- 8.306. Refuse will be stored within ground floor bin storage areas. On the day of collection, the management team will be responsible for transferring bins from the store to the temporary holding area and the external ground floor level within the site. Refuse collection operatives would trolley bins from the temporary holding area to a refuse vehicle and then management would be responsible for transferring the bins back to the store following collection.
- 8.307. Refuse associated with the Market Place element of the site will be stored on site. For those bins which are not externally accessible, the building management will be responsible for the transfer of bins on the day of collection.
- 8.308. Further details are also provided in the draft Operational Management Plan submitted as part of this application.
- 8.309. It is expected that a comprehensive Delivery and Servicing Plan could be conditioned as part of any future planning approval to agree a suitable arrangement in accordance

ii) Public Right of Way

- 8.310. As per the previously consented scheme, it is proposed to reinstate a historic right of way through the site that once connected Friar Street and Broad Street. The Council previously acknowledged that this route has been somewhat limited following the Sainsbury's development. There is however a route through the retail store during the opening hours as a 'permissive path' which was secured via a legal agreement.
- 8.311. This route has also been further hindered by the hoardings that have been erected at the application site to ensure that the site is safe and secure whilst it remains vacant therefore providing no public benefits.
- 8.312. There is also a public access route through the site which was agreed in clause f) of the legal agreement dated 15 August 1893 between Mr Joseph Charles Fidler and The Mayor of Reading. This clause stated,
- "The said Joseph Charles Fidler / his executors administrators or assigns shall and will for ever hereafter open and keep open to the public the said arcade as defined by sub-clause (b) or clause 5 of these presents and hereby grants to the Corporation their successors and assigns for the use of the public and of all persons desiring to use the same free right of passage and way through the said Arcade to or from Friar Street aforesaid and the said Corn Exchange General Market and Market Passage or either of them at all hours at which the said Corn Exchange General Market or Market Passage shall for the time being be open to the Public or for any purpose whatsoever."*
- 8.313. The proposed scheme will re-introduce the access route through the site to connect with the 'permissive path' through Sainsbury's and also onto Market Way providing access to Market Place. The right of way will be moved slightly eastwards so that the entrance from Friar Street sits between proposed retail unit 2 and 23 – 26 Market Place. The entrance onto Market Place will remain as existing adjacent to 33 – 34 Market Place.
- 8.314. In accordance with the principles of Secure by Design, two access gates will be provided within the site to ensure safe and secure access for future all. It is proposed that the access gates will be closed by the hotel management overnight. Fob access will be given to the hotel so that out of hours access to the hotel entrance and emergency access will be maintained after hours.
- 8.315. The proposed scheme, which will reinstate the public access route through the site will comply with the historic agreements in place and is therefore considered acceptable. Separate consent will be obtained to amend the public right of way following the grant of any planning permission.

jj) Sub station

- 8.316. The proposed scheme will require the creation of a new substation to serve the new Friar Street building owing to the level of additional power demands from the site.
- 8.317. The substation will be located at ground floor level and accessed from Market Way. Being located at this level will avoid any adverse noise impacts upon proposed and existing adjacent uses that cannot be mitigated through conditions or Building Regulations compliance.

9. Planning Obligations and CIL

Planning Obligations

- 9.1. The application proposals are likely to trigger a number of planning obligations that have been discussed during the pre-application process in accordance with the Council's Planning Obligations under Section 106 SPD.

The draft Heads of Terms therefore could include:

- i. Measures to secure Employment, Skills and Training;
- ii. Measures to retain a public access route through the site;
- iii. Public realm works;
- iv. Measures to secure a Travel Plan and any associated monitoring fee;
- v. Measures to secure the required contribution towards affordable housing relating to the residential units at Market Place.

- 9.2. The final obligations required from the development will be discussed and agreed during the determination of the application.

Community Infrastructure Levy

- 9.3. Reading Council adopted their CIL Charging Schedule in January 2015. For residential the charge is set at £120 per sqm across the Borough. In central Reading the CIL rate for retail is £0 per sqm and £30 per sqm for offices in the central core of Reading.
- 9.4. To support this application, a CIL additional information form has been completed and submitted as part of this application.

10. Public Benefits

10.1. The National Planning Policy Guidance (NPPG) defines public benefits as that which may follow from development and can be anything that delivers economic, social or environmental progress as described in paragraph 8 of the NPPF. Public benefits should flow from the proposed development and they should be of a nature or scale to be of benefit to the public at large, and should not be a private benefit. Benefits do not always have to be visible or accessible to the public in order to be a genuine public benefit. Public benefits should be weighted positively in the favour of the proposed development.

10.2. This section sets out the public benefits that will be brought forward by the proposed development.

Economic

10.3. The proposed development will deliver substantial economic benefits in like with the NPPF.

Economic Benefits

10.4. The hotel will generate a visitor expenditure directly into the local economy of approximately £3.9 million per year.

10.5. The proposed scheme will result in 100 net new jobs for the operation phases of the development.

Revenue from the site

10.6. The redevelopment of the site to provide both commercial and residential uses will generate substantial additional Council income through Council Tax and Business Rates. It is estimated that the total business rates income per annum will be £355,000 and the Council tax income per annum will be £15,000.

10.7. The creation of new residential units at Market Place will generate approximately £88,000 of residential expenditure per annum for the local economy.

10.8. The proposal could also attract a level of income from the Council's Community Infrastructure Levy.

Jobs in construction

10.9. The proposed scheme will result in 100 net new jobs during the construction phases of the development.

Social

10.10. The proposed development will deliver social benefits in line with the NPPF.

New dwellings

10.11. Provision of 8 new residential dwellings from the conversion of the upper floors of the listed buildings in a mix of unit sizes to meet the needs of the town centre.

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10.12. Provision of 1 family sized unit (13% of total) which represents a good mix of unit types within the scheme.

10.13. Contribution towards offsite affordable housing requirements in accordance with Policy H3.

Public Access

10.14. The proposed scheme will retain and re-open a route through the site, opening it up for public access under the terms of the 1893 agreement.

10.15. The access route will provide an A-B route from Friar Street to Market Place improving wayfinding and public realm initiatives within the locality. The route will also re-establish the route from Friar Street through to Broad Street via Sainsbury's.

Re-provision of Public House

10.16. The proposed scheme will re-provide 260.4 sqm for an Sui Generis public house unit at basement and ground floor of 29 – 31 Market Place.

10.17. The re-provision of the public house will encourage social integration for existing and future local residents within the area, as well as providing new jobs and economic benefits to the scheme.

Heritage

10.18. The proposal will bring back into use a key site within Reading Town Centre which has been derelict for approximately ten years.

10.19. Secures the viable reuse of the listed buildings on Site (which are currently vacant and their conditions deteriorating) in the interests of their future conservation. The scheme also involves works of required repair, refurbishment and ongoing maintenance of the historic buildings, funded by their conversion and reuse.

10.20. Generates improvements to the immediate townscape setting of Nos.23-26 Market Place, Church of St Laurence, Town Hall complex, Nos.33-34 Market Place, Corn Exchange Arcade Entrance, and Queen Victoria Jubilee Statue, through the creation of high-quality new architecture and public realm / pedestrian route on Site.

10.21. Reinstatement of the historic building line along the north side of the Site and around the corner from Friar Street to the Market Place; remedying an unsympathetic post-war change to the historic townscape.

10.22. Delivery of an appropriate mix of commercial and residential uses on Site, accommodated within existing retained historic buildings or high-quality new architecture which has been tailored specifically for its historic context.

10.23. Delivery of improved permeability through the urban block and Site as part of its connections to the surrounding townscape. Including reinstatement of a route from Friar Street to Market Way to the Market Place, and new open rear yard space, that reflects the former arcade and also the historic street pattern.

Planning Statement

Former Bristol & West Arcade, 173-175 Friar Street and 27-32 Market Place



- 10.24. The scheme will provide a positive contribution to the character and appearance of the Market Place / London Road Conservation Area, the Town Hall and the Grade I Listed St Laurence Church in addition to the public realm of Town Hall Square.

High Quality Architecture

- 10.25. The proposal will bring forward a well-designed scheme that responds to and reinforces the context and character of the surrounding area. The design responds to the historic development, grain, building form and materiality of the surrounding area.
- 10.26. The buildings have been designed to use materials that are sympathetic to the rich fabric of the surrounding area. The proposals will use a palette of materials including sandstone and mixed brick to reflect the Grade I listed Church opposite the site.

Sustainability

- 10.27. The proposed development will achieve a minimum BREEAM rating of 'very good' for all parts of the development.
- 10.28. The integration of renewable technologies for both heating and cooling.
- 10.29. The proposed development will incorporate a number of highly efficient building services and will provide a biodiverse roof to the flat roof areas of the new build element.
- 10.30. Overall, there will be a reduction in CO2 emissions for the new build elements. The proposed scheme has been designed to meet Part L of the Building Regulations.

Conclusion

- 10.31. These public benefits are considered to be in line with the NPPF's provisions as set out below:

11. Conclusion

- 11.1. This statement has set out the proposed development has evolved since the consent in early 2019 as a result of active and extensive marketing of the site. The proposed scheme seeks to now create a high quality hotel at 173 – 175 Friar Street site for up to 182 beds as well as bringing back into use the properties at 27 – 32 Market Place as per their consented uses in 2019.
- 11.2. This new scheme has been subject to positive discussions with officers at Reading Borough Council, Ward Councillors and other key stakeholders including presentation to Historic England. This statement has made an assessment of the proposed development against relevant planning policy, including the Council's adopted Local Plan and the NPPF.
- 11.3. The applicant team consider that substantial public benefits will be delivered by the proposed development coming forward and market interest has been received by a number of hotel brands targeting a 4 star development. It is concluded that the proposed development complies with the relevant policies within the Development Plan, has put forward a strong case as to why the consented scheme cannot come forward in the current and foreseeable market conditions and has presented a substantial package of public benefits that will be unlocked in allowing the site to come forwards.
- 11.4. To summarise, the key highlights of the scheme are:
- Provision of a new 182 bed hotel in a key accessible town centre location.
 - Provision of 8 residential units including a range of sizes and family sizes accommodation.
 - Contribution towards off site affordable housing in accordance with policy.
 - Creation of a total of 100 construction and 100 operational related jobs .
 - Re-provision of 2 historic flexible retail units at 27-28 and 32 Market Place.
 - Re-provision of a public house to 29 – 31 Market Place.
 - Retention of a public right of way though the site to connect Friar Street, Broad Street and Market Place.
 - High standard of architecture and design to preserve and enhance the character and appearance of heritage assets with improvements to the special interest of the Market Place listed buildings and the Friar Street frontage
 - Overall revitalisation, investment and reinvigoration of a vacant and derelict site in Reading town centre.
- 11.5. For these reasons, we would respectfully request that the application is recommended for approval by officers to recognise the significant benefits that the scheme will bring to Reading town centre.

Nick de Lotbiniere
Director

+44 (0) 207 557 9992
NdeLotbiniere@savills.com

Mary Fortune
Associate

+44 (0) 207 075 2849
Mary.Fortune@savills.com

APPENDIX 1

Full Planning History for the application site

Planning Statement

Former Bristol and West Arcade, 173 – 175 Friar Street and 27 – 32 Market Place

173 – 175 Friar Street				
Reference	Address	Development	Date	Decision
180358	173 – 175 Friar Street	Demolition of vacant former Bristol & West Arcade (173 – 175 Friar Street) and erection of an eight storey mixed – use building (plus basement) to provide 35 residential units, 4,208 sqm of B1 office floorspace, and 5 retail units (A1/A2/A3), demolition of rear parts of 29-31 and 32 Market Place, the change of use of the retained units at 27-28, 29-31/32 Market Place at first, second and third floors to provide 8 residential units, change of use at ground and basement level of 32 Market Place from A2 to flexible retail use (A1/A2/A3), retention of 260.4 sqm of A4 use at ground and basement at 29 – 31 Market Place, change of use at ground and basement of 27 – 28 Market Place to flexible retain use (A1/A2/A3), and associated internal and external works to the listed buildings, landscaping, refuse, plant, cycle stores and substation at basement level.	09.02.2019	Permitted
61033	175 Friar Street	Refurbishment of shopping arcade and offices. Partial demolition and addition of health club and 14 dwellings.	20.03.2007	Permitted
60795	175 Friar Street	Refurbishment of shopping arcade and offices (including partial demolition), construction of new gym and 14 apartments (12 x 2 bed and 2 x 3 bed)	15.11.2006	Refused
61338	175 Friar Street	Demolition to rear of part first floor 4 shop units and roof light reconstruction of retail units with a new glazed wall and new roof	08.08.2006	Permitted

Planning Statement

Former Bristol and West Arcade, 173 – 175 Friar Street and 27 – 32 Market Place

27 – 32 Market Place				
Reference	Address	Development	Date	Decision
80740	29 – 32 Market Place	Change of use of building to a basement bar (class A4 use), ground floor retail units, and a mixed use hotel/restaurant/bar (class C1/A3/A4) on the first, second and third floors, partial demolition of rear of building, three storey extension to the rear, refurbishment of building, and new Market Place façade.	06.11.2008	Permitted
80843	29 – 32 Market Place	LBC change of use of building to a basement bar (Class A4 use, ground floor retail units, and a mixed use hotel/restaurant/bar (Class C1/A3/A4 use) on the first, second and third floors. Partial demolition of rear of building, three storey extension to the rear, refurbishment of building, and new Market Place façade.	12.11.2008	Permitted
80605	29 – 31 Market Place	Demolition of 20 th Century buildings to the rear of 29 – 31 Market Place	23.05.2008	Refused
71257	29 – 31 Market Place	Refurbishment and revitalising of retail area, restaurant, bar and letting rooms. Alterations, partial demolition and addition of extension to rear	18.02.2008	Withdrawn
71258	29 – 31 Market Place	LBC: Refurbishment and revitalising of retail area, restaurant, bar and letting rooms. Alterations, partial demolition and addition of extension to rear	18.02.2008	Withdrawn
110852	27 – 32 Market Place	Application for an extension of the time limit for implementation of permission 08/00969/FUL for a change of use of building to a basement bar (Class A4 use), ground floor retail units, and a mixed use hotel/restaurant/bar (class C1/A3/A4 use) on the first, second and third floors. Partial demolition of rear of building, three storey extension to the rear, refurbishment of building, and new Market Place façade.	02.02.2012	Permitted
110853	27 – 32 Market place	LBC: Works associated with the change of use of building to basement bar (class A4 use), ground floor retail units, and a mixed use hotel/restaurant/bar (class C1/A3/A4) on the first, second and third floors. Partial demolition of rear of building, three storey extension to the rear, refurbishment of building, and new Market Place façade.	13.01.2012	Permitted
120532	32 Market Place	Change of use of the first, second and third floors from office use to residential accommodation	14.08.2013	Permitted

Planning Statement

Former Bristol and West Arcade, 173 – 175 Friar Street and 27 – 32 Market Place

180358 & 183059	27 – 32 Market Place	Demolition of vacant former Bristol & West Arcade (173 – 175 Friar Street) and erection of an eight storey mixed – use building (plus basement) to provide 35 residential units, 4,208 sqm of B1 office floorspace, and 5 retail units (A1/A2/A3), demolition of rear parts of 29-31 and 32 Market Place, the change of use of the retained units at 27-28, 29-31/32 Market Place at first, second and third floors to provide 8 residential units, change of use at ground and basement level of 32 Market Place from A2 to flexible retail use (A1/A2/A3), retention of 260.4 sqm of A4 use at ground and basement at 29 – 31 Market Place, change of use at ground and basement of 27 – 28 Market Place to flexible retain use (A1/A2/A3), and associated internal and external works to the listed buildings, landscaping, refuse, plant, cycle stores and substation at basement level.	09.01.2019	Permitted
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APPENDIX 2

Pre-application enquiry 160184/PREAPP

19th February 2016

Charlotte Handscomb
Associate
Planning
Savills
33 Margaret Street
London
W1G 0JD

Via Email only to: chandscomb@savills.com

Your contact is: **Mr Jonathan Markwell, Planning**

Dear Ms Handscomb,

TOWN AND COUNTRY PLANNING ACT 1990

Enquiry Reference & Address: 160184/PREAPP - 173-5 Friar St, Reading.

Nature of enquiry: Pre-application enquiry regarding whether an historic planning permission (References 06/01560/FUL / 061033) has been lawfully implemented or not.

Your letter dated 29th January has been considered. Based on further records the local planning authority has, it is confirmed that a physical start of works on site begun and the RUAP contribution was paid as per your letter. In terms of pre-commencement conditions, based on information retrieved as part of this enquiry response, the following is confirmed:

Condition no.	Subject	Comments
2	Materials	Not accepted 21/04/08; Not accepted 12/05/08; Not accepted 02/09/08
3	CMS	Demolition agreed 11/01/08 / Construction agreed 21/04/08.
4	Hard & Soft Landscaping	Hard landscaping agreed 21/04/08 & 12/05/08; Soft landscaping?
5	Archaeology	WSI agreed via email 29/01/08; Other details not agreed 21/04/08
6	Lighting	More details required 21/04/08 & 12/05/08.
7	Friar St screens	Agreed 21/04/08
8	Security shutters	Not accepted 21/04/08; Not accepted 12/05/08; Not accepted 02/09/08
9	Security and Management Plan	Awaiting further details 21/04/08 & 12/05/08
10	Noise protection for residential units	Holding response 21/04/08; Agreed 12/05/08

11	Noise from health club	Holding response 21/04/08; Agreed 12/05/08
12	Air ventilation	Holding response 21/04/08; Not agreed 12/05/08; Not agreed 04/08/08; Not agreed 10/09/08
13	BREEAM	Agreed 21/04/08
14	Construction hours	Agreed 11/01/08

As such, it would appear that some pre-commencement conditions were agreed, but others (shown in bold in the table above, but for clarity no's 2, 4, 5, 6, 8, 9 & 12), based on the available information, were not. The dated letters referred to above are enclosed as part of this response.

Conclusion

Based on the above, it would appear that permission 06/01560/FUL / 061033 was physically implemented. However, it would appear that not all pre-commencement conditions were agreed, and, as such, it is not clear as to whether the permission was lawfully implemented or not.

I trust that this information is of assistance to you.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council, in the event of a formal application for planning permission (in this case a certificate of lawfulness). This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. Should you wish to discuss this matter further, please feel free to contact me.

Yours sincerely

Jonathan Markwell
(via email only)

Jonathan Markwell
Principal Planning Officer



Enclosed are letters dated:

11/01/08
29/01/08 (email)
21/04/08
12/05/08
04/08/08
02/09/08
10/09/08

APPENDIX 3

Pre-application enquiry 191688/PREAPP

Mary Fortune
Savills
33 Margaret Street
London
W1G 0JD

Frances Martin
Executive Director for Economic
Growth
and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

□ 0118 9373787

Our Ref: 191688/PREAPP

Direct: □ 0118 937 3625

e-mail: matthew.burns@reading.gov.uk

12 October 2020

ADVICE WITHOUT PREJUDICE

Your contact is: Mr Matt Burns, Planning

Dear Mary

TOWN AND COUNTRY PLANNING ACT 1990

Enquiry Reference & Address: 191688/PREAPP - 173-175 Friar Street & 27-32 Market Place Reading

Proposal: Pre-application advice for proposed Demolition of the vacant former Bristol and West Arcade. Erection of an 9-storey building (plus basement) to provide a C1 hotel of up to 210 beds. Refurbishment of no. s 27-32 Market Place and 8 proposed residential dwellings to the upper floors.

Thank you for your pre-application enquiry in relation to the above site. This written note of advice follows the pre-application meetings held on 12th December 2019, 14th April 2020 and 4th September 2020.

General advice / introduction / background

This written note provides a summary of the matters which were discussed at the pre-application meetings. The main areas upon which advice is sought are:

- Land use principles
- Layout, massing, design and impact on the Market Place/London Street Conservation Area and nearby listed buildings
- Works to the Market Place listed buildings (no.s 27-32)
- S106 matters

The advice set out within this letter is based on the latest set of plans and documents submitted to the Council on 12th August 2020 as well as those submitted within your email dated 17th September 2020.

Any planning application at the site would presently be considered within the context of the Reading Borough Local Plan 2019. Other topic based supplementary planning documents would also be applied where relevant, together with national policy and guidance (the NPPF and PPG).

The site/immediate surrounding area has a number of planning constraints / designations including:

- Allocated site for development (36-54 dwellings plus ground floor town centre uses) under Policy CR14d of the emerging Reading Local Plan
- Within the central core of the defined Reading Central Area (Policy CR1)
- Within the office core and primary shopping area of the defined Reading Central Area
- Partly within the London Street/Market Place Conservation Area
- No.s 27-28, 29-31 and 32 Market Place are Grade II listed
- No. 175 Friar Street is designated as a building of townscape merit
- A number of other listed buildings nearby (settings affected, e.g. St. Laurence's Church (Grade I))
- An existing covenant (dated 1893) grants public access through the former Bristol and West Arcade whilst the Corn Exchange and General Market are open
- Within an air quality management area
- Within an area of archaeological potential

Planning History

As you are aware there is an extensive planning history to the buildings/site which form part of the pre-application site. The most recent planning permission (and listed building consent) given on the site was as follows:

180358FUL & 180359LBC - Demolition of vacant former Bristol & West Arcade (173 - 175 Friar Street) and erection of an eight storey mixed -use building (plus basement) to provide 35 residential units, 4,208 sqm of B1 office floor space, and 5 retail units (A1/A2/A3); demolition of rear parts of 29 - 31 and 32 Market Place, the change of use of the retained units at 27 - 28, 29 - 31 Market Place at first, second and third floors to provide 8 residential units, change of use at ground and basement level of 32 Market Place from A2 to flexible retail use (A1/A2/A3), retention of 260.4 sqm of A4 use at ground and basement at 29-31 Market Place, change of use at ground and basement of 27 - 28 Market Place to flexible retail use (A1/A2/A3), and associated internal and external works to the Listed Buildings, landscaping, refuse, plant, cycle stores and substation at basement level - Permitted with S106 agreement dated 3rd January 2019.

Pre-Application Proposals

The proposals for which pre-planning application advice is sought are for:

- Demolition of Bristol & West Arcade and redevelopment of the site to provide a 9-storey hotel building (use class C1) with associated ancillary facilities including restaurant, bar, lounge and gym
- Refurbishment of the listed buildings at nos 27-32 Market Place. Change of use of the upper floors of these buildings to 8 x residential dwellings. No change of use proposed at ground floor and basement level.
- Demolition of rear parts of 29-31 Market Place and 32 Market Place to form courtyard area to the historic public access through the site which connects Market Place to Friar Street via Market Way.

Land Use Principles

Upper Floors

One of the principal differences between the consented 2018 scheme and the pre-application proposal is the introduction of a C1 hotel use as opposed to a C3 residential led scheme. Albeit 8 residential units are proposed to be provided to the upper floors of the Market Place listed buildings.

Policy RL1 (Network and Hierarchy of Centres) seeks to maintain and enhance the vitality and viability of centres, as well as widen the range of uses; and Policies RL2 (Scale and Location of Retail, Leisure and Culture Development) and CR4 (Leisure, Culture and Tourism in Central Reading) seek to locate new Leisure, Culture and Tourism facilities within the Town Centre. Therefore, a proposed C1 hotel with ancillary facilities including restaurant, bar, lounge, meeting rooms and gym would be considered appropriate within a town centre location. However, it is pertinent to note that the site is allocated for development under Policy CR14d which states that:

173-175 FRIAR STREET AND 27-32 MARKET PLACE

Change of use of listed buildings and development of remainder for residential and/or offices with retail and related uses on the ground floor, retaining the arcade form.

Development should:

- *Avoid detrimental effects on the significance of the listed building and the Conservation Area and their settings;*
- *Take account of potential archaeological significance;*
- *Address noise impacts on residential use; and*
- *Address air quality impacts on residential use.*

Site size: 0.18 ha 36-54 dwellings plus ground floor town centre uses

Therefore, whilst the proposed hotel use would be acceptable if considered in isolation the use would not accord with the site allocation policy for the site.

Any forthcoming application for a hotel use (above ground floor level) would therefore need to provide detailed justification as to why residential or office uses on the site cannot come forward, in particular given the recent 2018 planning permission for a 35-residential units and office accommodation on the site. Following our discussions on this matter at the pre-application meetings marketing reports have been provided which set out that that a marketing scheme for the now approved residential led scheme in 2017 did not attract any notable interest. A further marketing scheme for the residential led scheme in 2019 then attracted 35 enquiries with only 7 considered to be 'firm interest' and that of these 7 interested parties 4 of them were looking at the site as a perspective hotel as opposed to the permitted residential led scheme.

The supporting information submitted with the pre-application enquiry also states that given the Council can demonstrate a five-year housing supply then not bringing the site forward for a residential led scheme would not have significant impact on the Council's housing provision. Whilst it is the case that the Council can demonstrate a five-year housing supply this is not considered adequate justification in itself to not deliver on site allocations of a very new Local Plan which was adopted in November 2019.

In terms of the loss of the existing office use/floor space at the site (the former use of the upper floors of the buildings) the above marketing stud is noted but this would also need to be justified in line with the criteria set out in Policy EM3 (Loss of Employment Land). Whilst this was justified under the 2018 permission the office space was to be partly re-provided as part of the development. Again, given the site allocation under Policy CR14d also refers to the redevelopment of the site for office use so further justification for this would be required.

The marketing reports that have been provided as part of this application are acknowledged and provide a helpful background for officers. Whilst the evidence submitted is not considered overriding justification for failure to comply with the site allocation requirements it is noted and is not insignificant. This failure is still considered a shortcoming of the proposals and a matter would fall to be considered within the overall planning balance judgement of the scheme. Therefore, it is likely that the development would need to show strong adherence to or go beyond the other relevant policy requirements in order to address this shortcoming and provide a thorough justification for any application presented to Committee.

Subject to detailed development control considerations and compliance with the relevant Local Plan policies, there is no objection in respect of the provision of eight C3 residential units to the upper floors of the Market Place buildings and this would be reflective of the extant planning permission in relation to this part of the site.

Ground Floor

The site allocation under Policy CR14d as set out above also stipulates that development on the site should have retain retail and related uses at ground floor level and that development should retain

the arcade form layout. This arcade layout relates to the collection of small retail units with the Bristol and West Arcade part of the site.

The recent 2018 permission permitted loss of the arcade form to an extent. Nonetheless, through discussions with officers the scheme was amended to incorporate retail units positioned off the pedestrian passageway through the site which connects Friar Street to Market Way. Amendments to the mix of retail units within the development as a whole were also secured to incorporate three small units (under 100 sq.m) out of the seven retail units proposed, both within the Friar Street and Market Place buildings given the presence of small units and the arcade form was considered to be a significant part of the character of this part of the Town Centre. This was justified on a very much 'on balance' basis following submission by the applicant of a study of the vacancy of retail units within the town centre and in particular other small retail units.

The pre-application scheme proposes that the C1 hotel use of the site would also extend to the ground floor of the development including the Friar Street frontage. Market reports have been provided with the pre-application request which advise that there is already an oversupply of small retail units within the town centre and also a lack of demand, demonstrated by high vacancy rates, for existing arcade style pitches. The submitted evidence is acknowledged and is considered relevant, albeit not to such an extent that this would completely override the requirements of the policy.

The uses proposed to the ground floor, whilst ancillary to the hotel would, in the form of a restaurant, bar, gym and reception/lobby area be acceptable town centre uses in their own right. The proposed hotel and ancillary uses would also be considered acceptable in the context of the general town centre use policies including being located within the Friar Street designated Primary Frontage under Policy CR7. Therefore, the policy conflict in respect of ground floor land uses is with the site allocation Policy CR14d for this particular part of the town centre rather than the more general land use policies for the central area.

However, the Policy CR14d does not just solely relate to a land use consideration but also the retention of the arcade form layout which is also protected under Policy CR8 (Small Shop Units in Central Reading) and is a characteristic feature of parts of the town centre which the Local Plan seeks to retain. The current pre-application proposals seek to remove the arcade layout in full which would conflict with both the above policies. Whilst some loss of the arcade form was permitted under the extant consent on the site, this was only a partial loss and was justified following submission of retail marketing assessment reports, with some small units kept and also where larger units were proposed these were under a retail use class.

The market reports submitted under the consented scheme are similar to those submitted with this pre-application request. Whilst it is acknowledged that the ongoing circumstances surrounding the Covid-19 pandemic have further harmed the retail economy, this is not considered justification to override the policy requirements in terms of retention of the arcade form. The pre-application request is also accompanied by a detailed review of the overall benefits of the development, notably in terms of economic impact, attracting visitor to Reading and providing jobs. These impacts are

acknowledged and would fall to be considered as part of the overall planning balance of any assessment of a future planning application but again are not considered so significant as to override the policy requirement in relation to retention of the arcade form.

During our pre-application meetings you made clear that a retail-led arcade style layout to the ground floor level of the proposed development would not be compatible with the envisaged hotel use of the site by your client. At the most recent pre-application meeting on 4th September 2020 we discussed the option of setting out the proposed ancillary hotel facilities on the ground floor of the development, including restaurant, bar, gym and lobby in a manner which served to reflect an arcade layout; such as by dividing the different elements of the ground floor into smaller separate area or, at least, presenting the appearance of this externally in an effort to retain the semblance of arcade character and feel of the site.

This element of the proposed scheme would be linked to the retention and ‘activation’ of the historic pedestrian passageway through the site which connects Friar Street to Market Way. This was secured under the extant permission and is again proposed as part of the current pre-application scheme. Earlier iterations of the plans provided at the first pre-application meeting on 12th December 2019 showed the main hotel entrance to Friar Street which raised concern about what incentive there would be for people to utilise the thoroughfare. The latest version of the plans provided now indicate that the main entrance to the hotel would now be accessed via this space, as well as the restaurant and gym, which is welcomed in terms of activation and drawing footfall to this area. The plans also indicate that there would an external terrace seating area to the restaurant within the space forming a small square area, which would be created following demolition of parts of the rear of the listed buildings at no. s 27-32 Market Place which back on to the space. The proposed demolition is the same as that agreed under the extant consent and relates to non-original additions to the building.

Your email of 17th September 2020 contained initial drawings/visuals of views along the thoroughfare of a layout to the ground floor of the hotel which showed a degree compartmentalisation and sectioning of the frontages of the buildings within the passageway with the intention of presenting an arcade style appearance. The visuals submitted are considered to achieve this aim to a reasonable degree but significantly this would only be to one side of the walkway. To make this approach work more convincingly it is considered that more detail would need to be provided regarding the uses and appearance of the rear of the Market Place units that also back onto the thoroughfare. The plans also reference inclusion of artwork and information boards relating to the original Bristol & West Arcade which is encouraged. Officers would welcome submission of further details of the proposed layout and artwork/information boards to review. It is not entirely clear from the visuals provided where the entrances to the ground floor hotel uses would be located, but the more entrances are provided off the thoroughfare the more this would present an arcade style layout. Hard/soft landscaping details for this area should also be provided.

Whilst this is an inventive proposal to retain a part arcade style layout, in my opinion and for the reasons set out above, the proposals do not go far enough to present an arcade style form and still

deviate too much from the requirements of Policies CR14d and CR8 for officers to be able to support this aspect of the scheme.

Scale, Massing and Design Matters

Policy CC7 (Design and the Public Realm) seeks to preserve or enhance the character of the area in which a development is located and Policy CR2 (Design in Central Reading) seeks to secure appropriate relationships between buildings, spaces and frontages within the centre of Reading. Policies EN1 (Protection and Enhancement of the Historic Environment), EN2 (Areas of Archaeological Significance), EN3 (Enhancement of Conservation Areas), EN4 (Locally Important Heritage Assets) and Policy EN6 (Development in a Historic Context) seeks to preserve or enhance the historic character and setting of heritage assets.

The pre-application proposals are for an 8-storey building (with basement) to be located on the site of the Bristol and West Arcade. In terms of general height, the proposals are shown to be broadly similar to the consented residential-led scheme. You will be aware that the height, bulk and massing of the consented residential-led scheme was subject to significant discussion and negotiation at pre-application stage and also during consideration of the planning application both with officers, the Council's Heritage Consultant and Historic England. The officer report to Committee for the previous applications/consents identified that 'less than substantial harm' would be caused to surrounding designated heritage assets including the setting of the London Street/Market Place Conservation Area and the adjacent Grade II* listed town hall building and grade I listed Church of St Laurence. In accordance with Paragraph 196 of the NPPF (2019) this harm is required to be weighed against the public benefits of the proposal and the recommendation for approval was made on an 'on balance' basis.

It is considered that the consented scheme was likely to have been the maximum in terms of height and massing given the site's prominent and sensitive location within close proximity to a number of designated and non-designated heritage assets. The comparative elevation drawings provided indicate that proposal would not visually exceed the consented scheme in terms of height and bulk. In my opinion, any proposal which does go materially beyond the envelope of the consented scheme would be unlikely to attract support from officers.

In terms of footprint, the proposal seeks to partly reinstate the historic building line to Friar Street to bring the front elevation of the building forward in line with those either side which was secured under the previous application. However, it is understood that this is now only proposed from first floor level and above where the building adjoins no. 23 Market Place and that the building cannot be brought down to ground floor level due to the presence of underground services. This is noted and whilst disappointing is considered to have other benefits in terms of providing a wider and more open entrance to the historic passageway through the site to Market Way which could encourage greater footfall to this walkway.

At 5th floor level and above, the permitted residential scheme adopted an angled and off-set orientation of accommodation arranged in a series of projecting bays with the massing of the building stepping back from the curved frontage as the storey height increased. This off-set orientation and arrangement of the upper floors of the building was considered key to the assessment of the extant permission in terms of breaking up the building's massing which was important due to the impact of the development upon the setting of the Market Place/London Street Conservation Area and nearby listed buildings, including the Grade I listed St Laurence's Church to the north on the opposite side of Town Hall Square. The pre-application proposal appears to follow this lead to some extent with the floors stepping back from the front elevation as the storey height increases. From our discussions I understand that construction complexities would make the angled and off-set orientation of the upper floors challenging and therefore this aspect is no longer proposed with these floors now proposed to match the alignment of the lower floors, albeit further stepping to individual floors has now been introduced in an effort to break up and add visual interest in another way. Whilst the off-set orientation of the upper floors is still the strong preference of officers in terms of breaking up the massing, that proposed is not considered an inappropriate approach in its own right. However, this is another positive element of the consented scheme that the pre-application proposals seek to omit.

As with the consented scheme there would be some, limited views, of the upper floors of the building from Market Place to the backdrop of nos 27 to 32 which would harm the settings of these listed buildings. The proposals would be within the massing envelope of the consented scheme and this harm is likely to again be considered less than substantial and to fall to be assessed in the overall planning balance of the scheme.

During the course of the three pre-application meetings that have been held under this pre-application request, a number of iterations of the design of the main Friar Street elevation of the building have been put forward. A key aspect of the new-build element of the consented scheme was its integration with the differing architecture and materials of the adjoining buildings either side on the Friar Street frontage. The approved plans presented the building as two differing elements with a red brick façade to the section of the building adjoining no. 172 Friar Street and a smaller limestone façade section to the part of the building adjoining nos 27-32 Market Place and the windows of each section of the new build ran through at the level of the existing adjoining properties either side. The small limestone façade section also projected forward of the red brick element providing depth and assisting in integrating the two contrasting sections of the building frontage itself. The most recent iteration of the plans now broadly follows this approach.

From our discussions I understand that the main obstacle to achieving the appearance of the consented scheme in terms of window level and proportions to the Friar Street frontage is the differing floor levels within the site and adjacent buildings which make it difficult to achieve a consistent window level and proportion with the adjacent adjoining buildings. This now means that there would be a row of small essentially faux windows to the third floor of the limestone section of the building to ensure that the window level and size runs through with the adjoined limited stone building at no. 23 Market Place. At third floor level and due to the small size of the windows it is not considered that this design detail would be obviously evident from Town Hall Square and the benefits

it presents in terms of the overall appearance and proportionality of the frontage as a whole are considered more significant. The proposed windows appear to show a good depth of window reveal which is considered appropriate for the historic setting. Furthermore, the retention of the slight forward projection of the smaller limestone façade section beyond that of the red brick element to the east at 5th floor level above provides depth and is welcomed in terms of integrating the two contrasting sections of the building frontage.

In terms of more detailed design matters, the red brick section of the building is considered to lack grounding because the red brick finish (aside from a single column) stops at first floor level - it is considered that the other ground floor columns should continue the red brick detail down to street level. Further information regarding the brick detailing between the windows of the red brick section of the building should also be provided. The supporting design pack submitted with the pre-application request states that this is reflective of surrounding buildings, but it is not obviously clear how this approach fits with surrounding character and this should be clarified and addressed accordingly. Further to our most recent meeting we discussed how surrounding buildings within the conservation area generally contain intricate window bars and transoms to fenestration. I note the latest iteration of plans submitted in your email of 4th September 2020 now includes window bars to the red brick part of the building. However, this is in the form of a single off-set window bar which in my opinion is not in keeping with the surrounding buildings.

The submitted visuals show indicative high-level vertical signage at second and third floor level to the Friar Street frontage. Signage at this height and of the size proposed would not be welcomed in this location within the conservation area and adjacent to the Grade I listed St Laurence's Church and would very likely be considered detrimental to the setting of these heritage assets. In my opinion any proposed signage should be limited to ground floor fascia level signage only. Notwithstanding this a separate application for advertisement consent would be required for any signage.

The site lies in an area of high archaeological potential, as illustrated by previous archaeological investigations within the application area. These previous incomplete archaeological investigations within the site identified the presence of several phases of activity within the site, starting in the 11th Century and including the burial of human remains. Archaeological investigations will ensure preservation, either by record or in situ, of any heritage assets present on the site in a manner appropriate to their significance, in accordance with local and national planning policy. The basement accommodation proposed appears more extensive than that approved under the extant planning permission which may have implications in terms of archaeology, and this will need to be addressed within the supporting information for any future planning application in accordance with Policy EN2.

Market Place Buildings

Unlike the consented scheme, it is understood that the pre-application proposals do not seek to change the use of the Market Place buildings (nos 27 to 32) which formed part of the previous application and also now the site allocation under Policy CR14d, notably because this part of the site is now under separate ownership to the arcade. However, as explained during our series of pre-

application meetings the repair/refurbishment works and proposals to bring the Market Place buildings back into use and giving them purpose were considered a substantial planning benefit of the consented scheme. In short, this could be considered akin to enabling works in facilitating the larger retail/residential/office element of the development to come forward and was/is considered a significant benefit of the former scheme.

Following our discussions on this matter the pre-application scheme now proposes to secure a scheme of repair and refurbishment (including demolition of non-original rear elements as agreed under the extant consent) to no.s 27-32 Market Place which it is proposed to secure by way of section 106 legal agreement, with works to be carried out prior to occupation of the hotel. A condition survey of the listed buildings and schedule of repairs has been submitted. This has been reviewed by our heritage consultant who, in short, advises that the report is of a good standard in terms of identifying issues and problems to be addressed but that greater detail would be required in terms of proposed works/repairs with regard to repair/construction methodologies appropriate for works to listed buildings and also use of materials to allow any such scheme to be agreed. It should be noted that this works would also require a separate listed building consent.

As explained previously, Officers' strong opinion is that both the arcade and Market Place parts of the site should come forward together as a holistic development with uses identified for the Market Place units, particularly noting concern with regard to functionality and relationship of the Market Place buildings with the passageway through the site. Whilst the proposed scheme of repairs to the Market Place buildings is welcomed and could feasibly be secured by way of a legal agreement, the benefits of the repair works to the scheme as a whole are considered limited - in simple terms the buildings should be being retained in an acceptable manner by the owners as their duty of care as the owner of buildings that are statutory listed.

Officers have visited the buildings on a number of occasions and have raised concerns with the owners with regard to their condition and continued deterioration. A scheme which includes re-use of all of the market place buildings is considered as high importance as even with repair works carried out the buildings could quickly fall back into disrepair without an active use or function.

S106 Matters

In addition to a schedule of works for repair (to secure timely implementation) of no.s 27-32 Market Place other possible s106 heads of terms for potential planning application include an obligation to update the existing 1893 passageway covenant by entering into a permissive path agreement with the LPA, a financial contribution towards infrastructure/public realm improvements to Forbury Gardens/High Street Heritage Action Zone within the Market Place London Street Conservation Area and a Construction and End User Employment Skills and Training Plan (see SPD for more details: <https://images.reading.gov.uk/2019/12/Employment-Skills-And-Training-Supplementary-Planning-DocumentApr13.pdf>).

Conclusion

The comments within this letter are provided in respect of land use matters, scale, layout, massing, design, heritage issues and s106 matters only.

As set out within the advice given in this letter it is considered that the scheme presents a number of shortcomings both in relation to land use, layout, design and heritage matters (relevant planning policies identified in the assessment part of this letter) but also relative to the consented planning permission on the site (ref. 180358FUL & 180359LBC). Whilst the pre-application proposals have been adjusted and amended during the series of meetings held as part of this pre-application advice request in an attempt to address these matters this has, in most cases, only partly been achieved and shortcomings remain.

The failure of the scheme to adhere to the relevant planning policies would in addition to the identified less than substantial harm to the setting of surrounding heritage assets (Market Place/London Street Conservation Area, Grade I St Laurence's Church and Grade II listed no.s 27-32 Market Place) fall to be considered against the planning benefits of the scheme within the overall planning balance judgement. A comprehensive list of planning benefits (social, economic and heritage environment improvements) has been submitted with the pre-application advice request and this is noted.

In my opinion, based on the information submitted to date, the shortcomings of the scheme currently outweigh the benefits. Unless a number of the shortcomings identified within this letter can be overcome then it is likely that any future application would need to fully adhere to, and likely exceed, policy requirements in respect of other matters not considered as part of this pre-application advice request, in order to alter the planning balance and allow officers to support the proposals.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council, in the event of a formal application for planning permission. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. Should you wish to discuss this matter further, please feel free to contact me.

Yours sincerely

Matt Burns

Matt Burns
Senior Planner
RJE

APPENDIX 4

Historic England pre-application advice 2018

Nadia Shakor

From: Richard Brookes <richard.brookes@turley.co.uk>
Sent: 07 February 2018 18:06
To: Mary Fortune; Ian David
Cc: Jenny Tonkins; emmy@rodicdavidson.co.uk; Nick de Lotbiniere; Mayad Rassam; Rafid Hanna; r.hanna@mutual-finance.co.uk
Subject: Fwd: 173-175 Friar Street

Mary / Ian et al

I have now received email comments back from HE with regard to the redesigned friar street elevation (and related changes). This can be followed in the email below

In summary, he accepts the rationale behind the change and is positively supportive of the design approach to fraud street. His criticisms relate to my mind to points of detail in terms of bay detail and materials rather than fundamentals. He invites further review on these details or even a meeting, which could be of further benefit, however I will be advised if the current programme allows for or requires this continued discussion in light of his support for the principles

I also invited him to consider the wider scheme, and he has raised no concern with regard to the reduction in the size of the courtyard in the depth of the block and also is positive about the massing of the new build at higher levels. Remember he has previously accepted a larger scale and massing on the site, and this comment stands again. He does criticise the elevation along the new route that faces the rears of the listed building as being perhaps too bold in this context, but I do not necessarily agree that change to a different treatment is required here in light of the wider context of old and new at the very edge of the conservation area, and also would want to avoid breaking down the coherence of the architecture of the new building

He refers to possible future meetings with RBC but again I can be advised with regard to if any opportunity exists for this, or indeed is fundamental at this stage

Regards

Sent from my iPhone

Richard Brookes
Director, Heritage

Turley

8th Floor
Lacon House
84 Theobald's Road
London WC1X 8NL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044
turley.co.uk
[Twitter](#)
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Begin forwarded message:

From: "Peats, Richard" <Richard.Peats@HistoricEngland.org.uk>
Date: 7 February 2018 at 09:59:29 GMT
To: Richard Brookes <richard.brookes@turley.co.uk>
Cc: "Peats, Richard" <Richard.Peats@HistoricEngland.org.uk>
Subject: RE: 173-175 Friar Street

Dear Richard

Thank you for sending this through. The design has clearly developed a lot, which I suspect is largely driven by the change from residential to office use for the 1st to 3rd floors. The Friar Street façade is now much more formal and regular, unsurprisingly it looks office-like. I quite like the regularity and the way in which the top of the third floor is given a little emphasis that recalls a cornice. The way in which the arrangement of the façade subtly changes in the projecting element also works well. I'm not so convinced by the way that the brick detail over the windows has been omitted in the western four bays of the first and second floors. I presume that the intention is to add some variety, which I think is needed if this elevation is to avoid becoming monotonous, but I think any variation here needs to be carried out with a bit more conviction and maybe take in the floor above too.

If this issue is resolved I think this has the potential to be either a handsome building or (as HRH would put it) a bit of a carbuncle depending on the quality of the materials and detailing. I think that the interplay between the basic frame, the brick panels and the windows will be crucial to get right, as this is likely to mark the difference between an interesting building and one that looks dull. Using materials which will weather well and give a high quality feel would also be crucial. I'd like to see some more detailed bay studies which give a clearer idea of what the architects are aiming for here.

The other big change is the reduction in the size of the courtyard. I thought that the previous scheme was working reasonably well here but I don't think opening up a larger space around the rear of the listed buildings, while not a bad thing, was a huge gain, as the backs of these buildings were never meant to be on show. Therefore the transformation of this space from a courtyard and destination to a route through is not problematic in principal. However, I am concerned about using a very regular façade like that proposed for Friar Street here, which is likely to look rather forbidding. I think a change of architectural character which gives more thought and finding a way to engage positively with the rears of the listed buildings and reinforcing the tightness of the urban grain is needed here.

The much less regular plan form of the upper floors breaks the mass of the building up in long views and I think works well.

I hope that these comments are useful and I would like to have a chance to view the scheme as it develops would be useful. It may also be helpful to come along when you next meet RBC.

Regards,

Richard Peats
Inspector of Historic Buildings and Areas

Planning Group
Historic England South East, 195-205 High Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

[<image0a9c31.JPG>](#)

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From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 30 January 2018 12:45
To: Peats, Richard
Cc: Jenny Tonkins; Ian David (ian@rodicdavidson.co.uk); Mary Fortune (mary.fortune@savills.com)
Subject: RE: 173-175 Friar Street

Dear Richard

In follow up to our telephone conversation a week or two ago I attach here new design information prepared by the architects (RDA) for this scheme in discussion with the project team. This is a further evolution of the design work you have inputted into; principally changes in direct response to ongoing advice at pre-application from the LPA and also a resultant change to the mix and distribution of uses, scale and massing, across the site. The focus here for ongoing discussion with HE is the new elevation to Friar Street (as previously the subject of workshopping with you at RDA studios last year). I copy in lead architect Ian from RDA here also

In summary, and in terms of the setting of the listed buildings on site, the scale and form of the previous courtyard space to be created within the depth of the site has changed and so has the overall height and massing of the new build element. We have previously supported the heritage benefits of better revealing the rear elevations of the listed buildings and how they are presented / and connect with the courtyard space. Although now more of a route through the site rather than a substantial open space, the beneficial effect remains in my view with regard to the listed buildings and would again be a benefit in heritage terms. In some ways the denser grain of development is more historic in its layout for this urban block

In study of the latest and further revised visualisations of the new build elements, their scale and mass appears now to draw further bulk away from the neighbouring listed buildings (outside the site) at the curved corner between Friar Street and Market Place at high level, which responds to past comments provided by LPA officers on this frontage of the new development. We also highlight that the maximum height of the new build element on site is now shorter than St. Laurence Church (albeit difficult to really appreciate in street views) and also that of the previously consented scheme. Again this change directly addresses previous comments from LPA officers and is in our view a further improvement in terms of respecting the setting of nearby and wider listed buildings within this part of the townscape

We have considered again the effect of new development on local street views and in particular how new build would appear within the backdrop to these views and setting of the wider group of listed

buildings. The now cranked plan and also greater articulation, detail and materiality to the elevations of the upper levels help to reduce the overall bulk and mass of the development visually. In the views from across the Market Place and also from Forbury; where new build appears above the roofline of listed buildings, the elevations of these upper elements are recessed back into the depth of the site and now reflect the grain of, and become deferential to, the traditional buildings to the foreground much better. Landmark townscape features (and listed buildings) such as the nearby Church, Town Hall and also the tower of the former Corn Exchange each maintain their prominence in views and are little diminished / distracted from by the new development

As the focus of our discussions - the architectural treatment of the replacement built frontage to Friar Street has also evolved significantly from earlier scheme proposals, in particular more recently in reflecting the change and shift in the type and mix of uses for this part of the development (principally retail and office from street level). In our view the latest design for this elevation responds positively to previous comments made both by LPA officers and HE on the guiding design principles, and would also respect and indeed enliven the activity and visual interest of this part of the streetscene relative to that existing

With regard to these guiding design principles, the new elevation would be distinctive but would also integrate with and complement its neighbours as part of the streetscene and wider townscape. Horizontally the frontage establishes a well defined and grounded base (shopfrontages and entry to the office space above), middle floors and clear top with parapet, which responds to the varied but well defined alignment and proportions of existing building within the wider urban block. The building line is again brought forward; as a benefit in townscape and heritage terms by reforming a more historic edge to the street. The entry to the new route through the site is appropriately marked by the form and design of this frontage to aid townscape legibility. Vertically there is a strong and regular rhythm to the frontage; both at the major and minor scale, that again reflects the established both plot and bay rhythms of the wider streetscene. The material palette is used to provide interest and also add richness to the elevation, and also draws on some of the characteristic materials of the local area (such as stone dressings and grey brick)

We have record that the applicant extended the initial free pre-application engagement with HE to gain further feedback from you; at a fee. Therefore these discussions should I assume be a continuation of that agreement

Please do not hesitate to contact me and or if you would like to meet again to further workshop the design with the architects

Kind regards

Richard Brookes
Director, Heritage

Turley

8th Floor
Lacon House
84 Theobald's Road
London WC1X 8NL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

turley.co.uk

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From: Richard Brookes
Sent: 08 January 2018 11:13
To: 'Peats, Richard'
Cc: Jenny Tonkins
Subject: RE: 173-175 Friar Street

Dear Richard

HE Reference: PA00481645

I hope you don't mind me emailing you directly with regard to the continuing project within the historic centre of Reading, and also a happy New Year to you

You previously provided a written response and also attended a couple of meetings with the project team last year at pre-application stage with regard to the redevelopment of a site between Market Place and Friar Street in Reading. Following this advice, also various inputs from the LPA and other consultants, the scheme approach and design has evolved noticeably. We are therefore keen to re-engage with you at this stage to share the new design and request further commentary on the heritage impacts of this, prior to application submission in the very near future

I believe that we extended the initial free pre-application engagement with HE to gain further feedback from you, but please do let me know our position now and how best to continue these discussions with you and how best to exchange new design information. Let me know if we need to re-agree this process, fees and timescales and I can liaise with the project team this end accordingly

Very regards

From: Peats, Richard [<mailto:Richard.Peats@HistoricEngland.org.uk>]
Sent: 18 April 2017 14:06
To: Richard Brookes
Subject: RE: 173-175 Friar Street

Richard,

That would be better for me, in fact if they want to meet earlier it would be even better. I could do any time after 9am.

Richard

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 18 April 2017 13:59
To: Peats, Richard
Subject: Re: 173-175 Friar Street

Thank you - apologies but could you possibly shift this slightly earlier to 2pm as the architects want to free some space in their meeting room? No worries if not on short notice

Sent from my iPhone

Richard Brookes
Director, Heritage

<image001.png>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

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On 18 Apr 2017, at 13:56, Peats, Richard <Richard.Peats@HistoricEngland.org.uk> wrote:

OK, all received. See you at 2.30

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 18 April 2017 12:32
To: Peats, Richard
Subject: RE: 173-175 Friar Street

Richard

The lead architect Ben Davidson and also Sinisa Rodic would join us at their studios tomorrow to workshop the design for the site. They have suggested 2.30pm – link to studios below

<https://rodicdavidson.co.uk/contact/>

Richard Brookes
Director, Heritage

<image001.png>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

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From: Peats, Richard [<mailto:Richard.Peats@HistoricEngland.org.uk>]
Sent: 18 April 2017 08:11
To: Richard Brookes
Subject: RE: 173-175 Friar Street

Richard

Sorry for such a tardy reply. I had to check another potential appointment on the 19th. It turns out that I'm free all day to meet in London re Friar Street if it is not too late.

Richard

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 11 April 2017 22:04
To: Peats, Richard
Subject: Re: 173-175 Friar Street

Richard

Am I able to hold a slot in your diary for the afternoon of the 19th for a preliminary design workshop with the architects and I? I can present your fee proposal to the clients on that basis. Would you be willing to meet in central London at the architects studio (Bloomsbury) ideally or at our offices also nearby?

Sent from my iPhone

Richard Brookes
Director, Heritage

<image001.png>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

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On 10 Apr 2017, at 10:42, Peats, Richard
<Richard.Peats@HistoricEngland.org.uk> wrote:

Richard

I don't think that we need to get inside the listed buildings. Your work is pretty comprehensive here and I think that the internal alterations can be dealt with by the Council's own conservation advisers. I'd be happy to meet to talk design on the 19th or the 27th but an extra meeting would take us past the 15 hours of free advice and into our charged service. If you are happy to do that I can put the necessary bureaucracy for this into place and get a quote together. If you don't wish to do this we can tack a design workshop onto the RBC meeting.

Please let me know what your client would like to do.

Richard

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High Street,
Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 05 April 2017 20:50
To: Peats, Richard
Subject: RE: 173-175 Friar Street

Thank you Richard

The agent Savills will be in contact with Susanna to confirm this as it would be sensible for HE, RBC and the applicant team to attend then. Would you also wish to gain internal access to the listed buildings or the modern arcade as part of that day? If so I would look to arrange this

In discussions with the architects further they are keen to progress work on the design and also to investigate new approaches for Friar Street as soon as possible and would like to be able to present something further to you (and RBC) prior to or for that meeting next month. This meeting is some time away due to RBC workloads but we would be keen to meet with you earlier for a workshop session and prior to then to allow this work to happen and so help progress

the design in the interim with your advice. Could this work for you? I see you may be available 19 or 27 April

Alternatively it may be useful to add on such a design workshop after the programmed RBC meeting in May to allow a more focused discussion on the architecture rather than perhaps being lost amidst other planning issues at discussion

Regards

Richard Brookes
Director, Heritage

<image001.png>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
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From: Peats, Richard [<mailto:Richard.Peats@HistoricEngland.org.uk>]
Sent: 04 April 2017 21:25
To: Richard Brookes
Subject: RE: 173-175 Friar Street

Richard

I could join in that meeting.

Richard

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High Street,
Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824 527162

From: Richard Brookes [<mailto:richard.brookes@turley.co.uk>]
Sent: 04 April 2017 21:21
To: Peats, Richard
Cc: Bedford, Susanna (Susanna.Bedford@reading.gov.uk)
Subject: Re: 173-175 Friar Street

Richard thank you

A meeting with RBC at civic offices has been arranged to review the revised scheme through the planning agent Savills for 2pm on 3rd May. Would you be able to join that discussion? I will liaise with the client team at this end also

Sent from my iPhone

On 4 Apr 2017, at 16:31, Peats, Richard
<Richard.Peats@HistoricEngland.org.uk> wrote:

Richard

I'd be more than happy to meet. I think this should if possible be with RBC so on site would be good. I would be available for a meeting on the 19th or 27th April or the 3rd, 5th 8th or 11th May (or later in May or June).

Richard

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High
Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824
527162

Richard Brookes
Director, Heritage

<[image001.png](#)>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

turley.co.uk

<[image002.png](#)> <[image003.png](#)>

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From: Richard Brookes
[<mailto:richard.brookes@turley.co.uk>]
Sent: 03 April 2017 20:26

To: Peats, Richard
Cc: Stephen.Vigar@reading.gov.uk; Jenny Tonkins
Subject: RE: 173-175 Friar Street

Thank you Richard this swift response is appreciated

Although the client team is yet to fully digest the contents of the letter, the scheme architect and I are very keen at this pre-app stage to arrange to meet with you on site or elsewhere as soon as possible to discuss design approaches for the Friar Street elevation of new built form that you would consider more appropriate and then for the design team to investigate this. We are open to further discussion on this aspect of the scheme and to understand also how you think this should change, in light of the particular criticism in the letter

I am happy to liaise / coordinate this as required as part of pre-app engagement

Regards

Richard Brookes
Director, Heritage

<image001.png>

The Charlotte Building
17 Gresse Street
London W1T 1QL
T 020 7851 4010
M 07711 874 179
D 020 7851 4044

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<image004.png> <image005.png>

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From: Peats, Richard
[\[mailto:Richard.Peats@HistoricEngland.org.uk\]](mailto:Richard.Peats@HistoricEngland.org.uk)
Sent: 03 April 2017 11:55
To: Richard Brookes
Cc: Stephen.Vigar@reading.gov.uk
Subject: 173-175 Friar Street

Dear Richard

Thank you for consulting Historic England on the proposed redevelopment of 173-175

Friar Street. Please find our initial comments attached.

Regards,

Richard Peats
Inspector of Historic Buildings and Areas
Planning Group
Historic England South East, 195-205 High
Street, Guildford, GU1 3EH
Direct Dial: 01483 252026 Mobile: 07824
527162

<image001.jpg>

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APPENDIX 5

Listing descriptions for 27 – 32 Market Place properties



27 AND 28, MARKET PLACE

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: 27 AND 28, MARKET PLACE

List entry Number: 1302967

Location

27 AND 28, MARKET PLACE

The building may lie within the boundary of more than one authority.

County:

District: Reading

District Type: Unitary Authority

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 22-Mar-1957

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 39074

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details



MARKET PLACE 1. 5128 [West Side] Nos 27 and 28 SU 7173 NE 1/206 22.3.57. II GV 2. Early C17 possibly older. 3 storeys and attic. Double jettied timber-frame with stucco infilling, pebbledashed. Tiled roof with crested ridge and ornamental cast iron gutter to eaves. Moulded 2nd floor jetty. 2 dormers. 2 original bay windows with mullion windows on each floor. Decorative lead work in upper part of windows. C18 shop front retained to ground floor with coved fascia and engaged columns. Outer doors, 5 panel (raised and fielded) with plain overlight to right, modern door to left (to No 29). Interior: 1st floor ceilings divided into panels by moulded strips.

Listing NGR: SU7169073501

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: SU 71688 73504

Map



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[1302967.pdf](#)

http://mapservices.historicengland.org.uk/printwebsevicehle/StatutoryPrint.svc/397118/HLE_A4L_Grade%7CHLE_A3L_Grade.pdf

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End of official listing



32, MARKET PLACE

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: 32, MARKET PLACE

List entry Number: 1156271

Location

32, MARKET PLACE

The building may lie within the boundary of more than one authority.

County:

District: Reading

District Type: Unitary Authority

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 14-Dec-1978

Date of most recent amendment: Not applicable to this List entry.

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 39076

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

MARKET PLACE 1. 5128 (West side) No 32 SU 7173 SE 3/532 II GV 2. Mid C19 . 4 storeys with bands between floors. Painted brick. 3 bays, glazing bar sash windows with segmental heads and keys. Moulded cornice to blocking course. Concealed roof. Modern ground floor premises with retrained of moulded fascia cornice over. Included for group value.

Listing NGR: SU7167873488

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: SU 71683 73486

Map



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[1156271.pdf](#)

http://mapservices.HistoricEngland.org.uk/printwebservice/hle/StatutoryPrint.svc/147183/HLE_A4L_Grade/HLE_A3L_Grade.pdf

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End of official listing



THE COOPERS PUBLIC HOUSE

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: THE COOPERS PUBLIC HOUSE

List entry Number: 1113537

Location

THE COOPERS PUBLIC HOUSE, 29-31, MARKET PLACE

The building may lie within the boundary of more than one authority.

County:

District: Reading

District Type: Unitary Authority

Parish:

National Park: Not applicable to this List entry.

Grade: II



Date first listed: 26-Jul-1973

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 39075

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

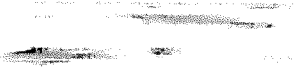
Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.



Details



MARKET PLACE 1. 5128 (West Side) Nos 29 to 31 (consec) (The Coopers Public House) SU 7173 SE 1/311 SU 7173 NE 3/311 26.7.73. II GV 2. C17 altered. False exposed timbering to front with 4 bays of 3 light casements in stucco infill. Wooden modillion cornice to parapet. Tiled roof. 2 C20 dormers. Rusticated stucco on ground floor with glazing bar shopfronts (modern to left, early C19 to right) and central entrance, pilastered doorpiece with fluted caps and scroll brackets to open pediment. 2 panel door with high arched radiating fanlight. Timber framing in gables to rear. Interior contains re-used fittings probably from C16 or C17 house. The Lounge Bar has oak panelled portion with good C16 or early C17 strapwork overmantel. 4 fluted Doric columns flanked by 2 enriched Doric columns and with 'wild men' herm-pilasters. Modillion cornice. The exit to No 29 has a fine door with circa 1600 decoration of recessed niche panels: to outside Ionic female herms, to interior fluted Ionic pilasters.

Listing NGR: SU7168073499

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: SU 71686 73495

Map



[1113537.pdf](#)

http://mapservices.historicengland.org.uk/printwebservicehle/StatutoryPrint.svc/109944/HLE_A4L_Grade%7CHLE_A3L_Grade.pdf

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