



Proposed Broad Street Mall Masterplan

Broad Street Mall, Reading, RG1 7GQ

Inception (Reading) Sarl (c/o Moorgarth Group Ltd)

Planning Statement Addendum

November 2019

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CONTENTS

1.	INTRODUCTION	3
2.	SITE CONTEXT	7
3.	FURTHER CONSULTATION	8
4.	THE AMENDED PROPOSED DEVELOPMENT	9
5.	PLANNING POLICY FRAMEWORK AND OVERVIEW	14
6.	PLANNING ASSESSMENT	17
7.	CIL AND PLANNING OBLIGATIONS.....	39
8.	CONCLUSION	41

1. INTRODUCTION

1.1 This Planning Statement Addendum has been prepared by DP9 Ltd in support of revised proposals, submitted on behalf of Inception (Reading) Sarl (c/o Moorgarth Group Limited) (the 'Applicant'), in connection with the Broad Street Mall Masterplan planning application (ref. 182137).

1.2 The revisions to the planning application are submitted following consideration of the consultation responses received from statutory consultees and following meetings with Reading Borough Council (RBC) and Design South East (DSE). It should be noted that only 1 objection has been received from the public and it relates to the former Eva's Nightclub which does not form part of this application and is subject to the recently consented Hosier Street Hotel development (ref. 182054).

3.1. The key planning issues raised during the consultation period on the application can be summarised as follows:

1. Height, Scale and Massing;
2. Design and Appearance;
3. Public Realm and Landscaping;
4. Proposed residential layout; and
5. Impact on nearby Conservation Areas.

1.3 The following amendments have been made to the scheme in relation to the above key planning issues raised during the consultation period on the application:

1. Inset balconies have been introduced to the upper floors of Blocks A, B and C to provide articulation and relief to the elevations.
2. Shoulders of Blocks A, B and C have been reduced in height to emphasise the verticality of the buildings.

3. Blocks A, B and C have been revised proposing a slimmer and more slender massing.
 4. All north facing single aspect units have been removed.
 5. Block D (Quadrant House) has been deleted from the proposals and removed from the planning application.
 6. Communal residential amenity deck for Blocks A, B and C have been increased in size and been reconfigured to make better use of the space whilst introducing defensible space around the first floors of the residential buildings.
 7. Ground level elevation and base of Block C has been amended to tie in with the existing Broad Street Mall elevation along Dusseldorf Way.
 8. Amendments to the materials palette of the public realm and simplifications of the proposals along Dusseldorf Way and Queens Walk.
 9. Materiality of Blocks A, B and C have been amended from terracotta cladding to metal rainscreen cladding.
 10. Block C shoulder is now brick to accentuate the materiality of the adjacent consented hotel and Conservation Area.
 11. Block E elevational treatment has been amended to terracotta cladding from previously tabled brick slip system.
 12. Hammerhead to Block E has been removed and overall form rationalised.
 13. Block E elevation rhythm redesigned to emphasise horizontality inspired by Fountain House.
 14. Inclusion of rooftop communal amenity space for Block E.
- 1.4 The proposed changes are described in more detail within the Design and Access Statement Addendum prepared by Corstorphine + Wright Architects.
- 1.5 The amended description of development is as follows:

“Construction of three residential buildings (Use Class C3) ranging in height from 5 to 22 storeys above Broad Street Mall and provision of a podium level

amenity area; Construction of a 16 storey building on South Court comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors; Creation of ground floor retail units (Use Class A1/A3/A4) fronting Dusseldorf Way and ground floor retail (Use Class A1/A2/A3) fronting Queens Walk; all necessary enabling and alteration works required within the existing Broad Street Mall basement, ground and upper floors; Associated car park alterations, provision of servicing and refuse storage, cycle parking, public realm, landscape, and other associated works”

1.6 The following documents form the amended application and are submitted alongside this Planning Statement Addendum:

1. Amended Planning Application Form, prepared by DP9 Ltd;
2. Revised drawings (November 2019), prepared by Corstorphine + Wright;
3. Design and Access Statement Addendum (November 2019), prepared by Corstorphine + Wright;
4. Amended Landscape Strategy & Proposed Drawings (November 2019), prepared by McGregor Smith;
5. Planning Statement Addendum (November 2019), prepared by DP9 Ltd;
6. Amended Transport Assessment (November 2019), prepared by Connect;
7. Amended Travel Plan (November 2019), prepared by Connect;
8. Amended Sustainability Statement (inc. BREEAM Pre-Assessment) (November 2019), prepared by Hoare Lea;
9. Amended Energy Strategy (November 2019), prepared by Hoare Lea;
10. Amended Ventilation and Extraction Statement (November 2019), prepared by Hoare Lea;
11. Amended Utilities Statement (November 2019), prepared by Hoare Lea;
12. Amended Foul Water Statement (November 2019), prepared by BJB;

13. Amended Financial Viability Assessment (November 2019), prepared by DS2;
14. Amended Fire Strategy (November 2019), prepared by Hoare Lea;
15. Amended Flood Risk Assessment and Drainage Strategy (November 2019), prepared by BJB;
16. Amended Environmental Statement – Non-Technical Summary (November 2019), prepared by Tirum;
17. Amended Environmental Statement – Volume I: Main Text (November 2019), prepared by Trium;
18. Amended Environmental Statement – Volume II: Townscape, Built Heritage and Visual Impact Assessment Addendum (November 2019), prepared by KM Heritage;
19. Amended Environmental Statement – Volume III: Technical Appendices (November 2019), prepared by Trium.

- 1.7 In conjunction with the amended drawings and technical reports, this Planning Statement Addendum sets out the amended Proposed Development and assesses the amended scheme against new national and local planning policy which has been adopted since submission of the original planning application in November 2018.

2. SITE CONTEXT

Site and Surrounding Area Planning History

- 2.1. Following the submission of the planning application in November 2018, RBC has approved further planning applications within and immediately adjacent to the Site. Below is an update to the Site and surrounding area planning history.
- 2.2. Planning permission was granted on 31 July 2019 for the amalgamation of Units 36 and 37 (Use Class A1) and change of use to form a flexible retail/restaurant/bar unit (Use Class A1/A3/A4), associated replacement shopfront works and associated external alterations on Dusseldorf Way and South Court Frontages (Ref: 190099).
- 2.3. Planning permission was granted on the 4 November 2019 for the erection of a part 7, part 8 storey building for use as 101 bed Hotel (Use Class C1) at ground – 8th floor and Restaurant with ancillary Bar (Use Class A3/A4) at ground floor, with means of access, servicing and associated works (Ref: 182054).
- 2.4. Other recent planning history for the Site relates to minor development such as change of use applications within the Mall.

3. FURTHER CONSULTATION

- 3.1 Following submission and validation of the original planning application scheme, the Applicant's team engaged with Reading Borough Council Planning Officers and Design South East as summarised below.
- 3.2. On 13 March 2019, the Applicant's team met with RBC to discuss the timelines, consultation and progress of the planning application, including proposals to revise the application design to respond to comments received from Design South East.
- 3.3. On 21 May 2019, the Applicant's team met with Reading Borough Council to discuss the potential amendments to the application scheme.
- 3.4. On 7 August 2019, the Applicant team held a conference call with Reading Borough Council to discuss further proposed amendments, responding to the Council's concerns to the design and height of the application scheme.
- 3.5. On 23 October 2019, the Applicant team met with Design South East to discuss the propose amendments, responding to comments received from Design South East in December 2018.
- 3.6. On 4 November 2019, the Applicant team met with Reading Borough Council to discuss the latest proposed amendments prior to formal submission of the amended scheme.
- 3.7. The proposed heights of the buildings have been considered acceptable in principle by Reading Borough Council, however it was noted that the design and materials proposed for the residential blocks must be of high quality design and material which adds to the quality of the area whilst being sympathetic to the local character and history of the surrounding Conservation Areas and listed buildings.

4. THE AMENDED PROPOSED DEVELOPMENT

4.1. This Section details what is now being applied for in the planning application for the Proposed Development. This Section should be read in conjunction with the Design and Access Statement Addendum and supporting technical reports.

4.2. This application now seeks full planning permission for:

“Construction of three residential buildings (Use Class C3) ranging in height from 5 to 22 storeys above Broad Street Mall and provision of a podium level amenity area; Construction of a 16 storey building on South Court comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors; Creation of ground floor retail units (Use Class A1/A3/A4) fronting Dusseldorf Way and ground floor retail unit (Use Class A1/A2/A3) fronting Queens Walk; all necessary enabling and alteration works required within the existing Broad Street Mall basement, ground and upper floors; Associated car park alterations, provision of servicing and refuse storage, cycle parking, public realm, landscape, and other associated works”

Amended Proposed Development

4.3. The Amended Proposed Development seek to continue the regeneration and improvement efforts brought forward by the Applicant over the past 24 months, initially through the significant investment and refurbishments of Broad Street Mall and Fountain House and more recently consents to bring the former Argos store back into use, which has introduced an Iceland at ground floor and a Cinema at first floor, and a 101 bedroom hotel and restaurant immediately adjacent to the Site on Hosier Street.

4.4. Planning permission is now sought for the construction of three residential buildings above Broad Street Mall, Block A (22 storeys), Block B (18 storeys) and Block E (5 storeys), the creation of two ground floor flexible retail units

(Use Class A1/A3/A4) along Dusseldorf Way and one flexible retail unit (Use Class A1/A2/A3) along Queens Walk, in addition to the construction of a residential building at South Court, Block C (18 storeys), with flexible retail (Use Class A1/A2/A3) at ground and first floors.

4.5. A summary of the proposed works is outlined below:

- Construction of three residential buildings ranging from 5 to 22 storeys above Broad Street Mall.
- Construction of an 16 storey residential building on South Court, comprising ground and first floor flexible retail (Use Class A1/A2/A3).
- Creation of two flexible retail units fronting Dusseldorf Way (Use Class A1/A3/A4)
- Creation of one flexible retail unit fronting Queens Walk (Use Class A1/A2/A3)
- Amendments to car parking at basement, first, second and third floor levels in order to accommodate residential buildings and residential amenity space at podium level.
- Construction of a large amenity deck at podium level which provides communal amenity space for residents of Blocks A, B and C.
- Rooftop amenity space atop Block E, which provide communal amenity space for residents of Block E.

Mixed-Use Development

4.6. The 2.42 ha Site continues to play an important role at both strategic and local levels. The amended Proposed Development seeks to deliver 446 one, two and three bedroom residential homes (Use Class C3), together with flexible retail floor space (Use Class A1/A2/A3/A4) in the Central Reading area. The scheme continues to make best use of previously developed land in a highly accessible location, together with an opportunity to create active frontages along Dusseldorf Way and Queens Walk, continuing on the regeneration and

improvement efforts brought on by the Applicant. The table below sets out the amended proposed floor areas for the Site.

Use	Amended Proposed GIA (sq m)
Residential (C3)	31,443
Retail (A1/A2/A3)	556
Retail (A1/A3/A4)	945
TOTAL	32,944

Table 1: Proposed Floor Areas

Residential

- 4.7. 446 new homes are proposed across the Site. A summary of each of the residential areas for the buildings and the total number of residential units is provided in the table below.

Building	GIA (sq m)	Units
A	11,308	164
B	9,479	134
C	7,332	98
E	3,324	50
TOTAL	31,443	446

Table 2: Proposed Number of Units

- 4.8. The residential units will comprise a mixture of one, two and three bedroom apartments, provided across the 4 separate blocks. The table below sets out the proposed unit mix.

	1 bed	2 bed	3 bed	Total
No. of units	217	207	22	446
%	49%	46%	5%	100%

Table 3: Proposed Unit Mix

It is anticipated that all residential accommodation will be delivered as Build to Rent, albeit that there is no differentiating Use Class when Build to Rent is compared to open market for sale and traditional affordable housing.

- 4.9. The proposed Discount Market Rent (DMR) provision equates to between 43 and 89 affordable housing units, which is between 10% and 20% of the total homes to be provided. The range results from the impact of different rent levels on the viability of the development. It is proposed to provide the affordable housing within Block E and in the lower floors of Block C if required.
- 4.10. The tables below indicate the proposed mix of units, but unit type for both the 9% and 20% affordable housing options.

Tenure	1 bed	2 bed	3 bed	Total
Build to Rent (BtR)	196	193	14	405
Discount Market Rent (DMR)	21	14	8	41
TOTAL	217	207	22	446

Table 4: Proposed Unit Mix by Unit Type 9% Affordable Housing Offer

Tenure	1 bed	2 bed	3 bed	Total
Build to Rent (BtR)	168	177	12	357
Discount Market Rent (DMR)	49	30	10	89
TOTAL	217	207	22	446

Table 5: Proposed Unit Mix by Unit Type 20% Affordable Housing Offer

- 4.11. The unit layouts have been designed to reflect the Site context and orientated to maximise the quality of accommodation. All previously single aspect north facing units have been amended and removed from the scheme.
- 4.12. The amended layouts and residential quality are considered in further detail in the Design and Access Statement Addendum, prepared by Corstorphine + Wright.

Amenity, Landscape and Public Realm

- 4.13. The Proposed Development includes amended residential communal amenity space at podium level above the Broad Street Mall multi storey car park and atop Block E. The communal amenity space will provide both hard and soft

landscaping with formal and informal seating, providing flexible communal outdoor space for residents and opportunities for informal play.

Car Parking

- 4.14. Given the accessibility of the Site, no car parking is proposed other than 22 wheelchair accessible parking spaces within the existing Broad Street Mall multi storey car park.
- 4.15. There are a total of 787 car parking spaces currently within the multi storey car park. Overall, 93 car parking spaces will be displaced within the existing multi storey car park to facilitate residential cores, the introduction of accessible spaces and realignment of vehicular routes.

Cycle Parking

- 4.16. A total of 234 secure cycle parking spaces for resident will be provided within the basement of Broad Street Mall for Blocks A, B and C, whilst secure cycle parking is provided at roof level of the multi-storey car park, immediately adjacent to Block E.

5. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 5.1. This purpose of this Section is to identify the planning policy framework relevant to the determination of the application for the amended Proposed Development.

National Policy

National Planning Policy Framework

- 5.2. Following submission of the planning application in November 2018, the National Planning Policy Framework (NPPF) was updated. The February 2019 NPPF sets out the government's policies for England and how these are expected to be applied.
- 5.3. At the heart of the NPPF is presumption in favour of sustainable development, for both plan making and for decision taking.
- 5.4. The NPPF explains that, "the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." (Paragraph 7).
- 5.5. Paragraph 59 states that, "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."
- 5.6. Paragraph 117 explains that, "planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for

accommodating objectively assessed needs, in a way that makes as much use as possible as previously-developed or “brownfield land”.

- 5.7. Furthermore, Paragraph 118 in part seeks to “promote and support the development of under-utilised land and buildings, especially if this would help meet the identified needs for housing where land supply is constrained.
- 5.8. Paragraph 122 explains that decisions should support development that “makes efficient use of land”, taking into account the identified need for different types of housing and other forms of development, local market conditions and viability, the availability and capacity of infrastructure and services, the desirability of maintaining an areas prevailing character, and the importance of securing well-designed, attractive and healthy places.

National Planning Practice Guidance

- 5.9. The Government’s National Planning Policy Guidance (NPPG) has been issued and is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The NPPG is an online resource where each guidance paragraph is directly linked with relevant polices set out in the NPPF.

The Development Plan

- 5.10. The original planning application submitted in November 2018 gave due consideration to RBC’s emerging planning policies, however since the submission of the planning application, RBC have adopted a new Local Plan which replaces the previous Development Plan. This includes the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document.
- 5.11. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), the Proposed Development must be determined in

accordance with the Development Plan unless material consideration indicate otherwise.

5.12. The Development Plan for Reading Borough Council is set out below:

- Reading Borough Council Local Plan (Adopted November 2019)

5.13. In addition to the adoption of the Local Plan in November 2019, RBC approved the Minster Quarter Area Outline Development Framework in December 2018. The Minster Quarter Area Development Framework provides development principles for the Minster Quarter Area.

5.14. There are also a number of supplementary guidance documents published by Reading Borough Council which have been taken into account during the course of the design development and preparation of the amended planning application. Insofar as they may be considered relevant to this application is the Reading Tall Building Strategy (January 2008), Reading Tall Building Strategy Update Note (March 2018), Sustainable Design and Construction SPD (2011), Employment Skills and Training SPD (2013) and Planning Obligations under Section 106 SPD (2015).

Site Designations

5.15. The Site is subject to the following designations within the Local Plan.

- Central Core;
- Primary Shopping Area;
- Designated Primary Frontage in Central Reading;
- Site Identified for Development or Change;
- Tall Buildings Cluster;
- West Side Major Opportunity Area;
- Office Core;
- Air Quality Management Area.

6. PLANNING ASSESSMENT

6.1. This Section comprises our assessment of the amended Proposed Development against the relevant planning policy and how the amended Proposed Development complies with planning policy in respect to the following:

- Principle of Proposed Development;
- Land Use;
- Design;
- Heritage and Townscape;
- Residential Standards;
- Residential Density;
- Affordable Housing;
- Private Amenity and Public Realm;
- Transport, and Servicing;
- Energy and Sustainability; and
- Environmental Considerations.

Principle of Proposed Development

6.2. The Proposed Development is for mixed-use development, comprising flexible retail (Use Class A1/A2/A3/A4) and residential (Use Class C3) floorspace on previously developed land and is located within a sustainable location in Central Reading.

6.3. The NPPF (2019) states that “at the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking...” it goes on to state “all plans should be based upon and contain the presumption in

favour of sustainable development as their starting point, with clear priorities that will guide how presumption should be applied locally.”

- 6.4. Local Plan Policy states that a positive approach to considering development proposals will be taken that reflects that of the NPPF and “where appropriate will work proactively with applicants jointly to find solutions which means that proposals can be approved wherever possible.”
- 6.5. The Site falls within the West Side Major Opportunity Area, which identifies the Site as an appropriate location for retail, leisure and residential uses.
- 6.6. Redevelopment of the Site will result in a substantial amount of new residential accommodation of high quality design, located in a highly accessible location. The Development would contribute to meeting the housing targets by adding 446 new residential 1, 2 and 3 bed units to the existing housing stock.
- 6.7. The Proposed Development will introduce outward facing retail units on to Dusseldorf Way and Queens Walk and it is clear that the proposed flexible retail land use (Use Class A1/A2/A3/A4) is inherently appropriate for this established town centre location.
- 6.8. For the reasons above, the principle of the Proposed Development is in accordance with planning policy. It is also in accordance with the Government’s overarching objectives for sustainable growth and will act as a catalyst to the regeneration of the wider area.

Land Use

Residential Use

- 6.9. The NPPF (Paragraph 59) sets out the Government’s objective of “significantly boosting the supply of homes.” Paragraph 118 states in part that decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing

where land supply is constrained and available sites could be used more effectively (for example building on or above car parks)”

- 6.10. Local Plan Policy H1 states that provision will be made for at least an additional 15,847 homes in Reading Borough over the plan period.
- 6.11. The Site falls within the West Site Major Opportunity Area, Local Plan Policy CR12d, which identifies the Site as an appropriate location for retail, leisure and residential uses.
- 6.12. The Minster Quarter Area Outline Development Framework further supports residential development at Broad Street Mall.
- 6.13. Planning policies at both a national and local level encourage the effective use of previously developed land. The Proposed Development would accord with this objective and make a valuable contribution to the regeneration within Reading.
- 6.14. In accordance with the NPPF and Local Plan, the Proposed Development will deliver 446 high-quality residential dwellings in Central Reading, contributing towards the Council’s housing stock in a highly accessible location. As such, it is considered that the principle of residential development is acceptable, and delivery of housing on the Site should be encouraged.

Flexible Retail Use

- 6.15. At a national level, the NPPF sets out the Government’s commitment to securing economic growth in order to create jobs. The planning system should encourage and not act as an impediment to sustainable growth, and local authorities should plan proactively to meet the development needs of business. Planning policies should be positive and promote competitive town centre environments and set out policies for management and growth of

centres, including allocating a range of sites to meet needs for retail, leisure and other uses in full.

- 6.16. Local Plan Policy CR7 requires uses on the ground floor along designated primary frontages to be within the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors
- 6.17. The Minster Quarter Area Outline Development Framework further suggests that the Council supports continued additional retail provision, with emphasis on restaurants located around the edges of the mall, taking advantage of new public realm and open space.
- 6.18. It is clear that the proposed flexible retail land use (Use Class A1/A2/A3/A4) is inherently appropriate for this established town centre location and will contribute towards maintaining and enhancing its vitality, viability and competitiveness.
- 6.19. The proposed retail units will activate the Dusseldorf Way and Queens Walk frontages and maintain and enhance an outward facing appearance to this part of Broad Street Mall, complimenting the internal refurbishments within the Mall itself.
- 6.20. It is therefore considered that the proposed flexible retail land uses is in accordance with the planning objectives of the NPPF and Reading Borough Council Local Plan.

Design

- 6.21. Paragraphs 124 and 127 within the NPPF state that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are

sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

- 6.22. Local Plan Policy CC7 states that all developments must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 6.23. Local Plan Policy CR10b states that a small number of tall buildings would be appropriate to create a distinctive grouping to mark the area as the civic heart of Reading and gateway to the centre. Tall buildings within the Western Grouping are required to be subservient to the Station Area Cluster and be generally lower in height than the tallest buildings planned for the Station Area Cluster.
- 6.24. The Minster Quarter Area Outline Development Framework Section 5.2 states in part that “the master plan has been based on the principle of accommodating 3-4 tall buildings on site, one of which falls on the former civic site, whilst the remaining 3 form new towers on the BSM upper podium level.”
- 6.25. The Applicant’s team has worked proactively and collaboratively with RBC since submission of the original application in order to address concerns raised with proposed height and design.
- 6.26. As set out in the Design and Access Statement Addendum accompanying the planning application, it provides an analysis of the constraints and opportunities presented by the Site and how the design of the Proposed Development has evolved and responds to these and concerns raised by RBC and statutory consultees during the consultation period.
- 6.27. In response to feedback received from RBC and DSE, the design has been revised both externally and internally. The resulting elevations and buildings above Broad Street Mall are well considered compositions, producing a

common architectural language across the buildings, combining elegance and simplicity with proportions, which results in a contemporary addition to Reading's townscape.

- 6.28. The amendments to the new buildings are well designed and the architecture is more ambitious and of significantly greater quality than previously proposed. The Proposed Development will create an active built edge to the street frontage along Dusseldorf Way and Queens Walk.
- 6.29. The Proposed Development will use high quality materials and architecture detailing which respond positively to the character of the local area, while still providing the buildings which unique character and appearance. The alterations to the upper floor of Blocks A, B and C and detailed elevational treatment add interest and will provide high quality development to this area of Reading.
- 6.30. The proposed height and massing has been influenced by the Site's accessible location within the Town Centre in addition to adopted policy which permits 3-4 tall buildings within this location. Whilst the Proposed Development is taller than 20 storeys, it sits below the maximum height of the revised consented schemes at Station Hill.
- 6.31. Additionally, the amended application is supported by a Townscape, Built Heritage and Visual Impact Assessment (THVIA), prepared by KMH and included with the Environmental Statement, which concludes that the scheme continues to sit comfortably with the existing building scales in the vicinity of the Site.
- 6.32. Overall the amended design marks a significant improvement to the previously submitted scheme. The Proposed Development maximises the development potential of the Site, whilst enhancing the existing local character and street scene.

- 6.33. It is therefore considered that the amended design of the Proposed Development is in accordance with the NPPF and adopted Local Plan Policies CC7 and CR10b and is therefore considered acceptable in design terms.

Heritage and Townscape

- 6.34. Chapter 16 of the NPPF deals with Heritage Assets describing them as an irreplaceable resource that should be conserved in a manner appropriate to their significance.
- 6.35. Local Plan Policy EN1 notes that historic features and areas of historic importance and other elements of the historic environment, including their setting, will be protected and where appropriate enhanced.
- 6.36. Local Plan Policy EN6 requires new development to make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities.
- 6.37. An assessment of the impact of the Proposed Development on local and strategic heritage assets is provided in the accompanying Townscape, Built Heritage and Visual Impact Assessment.
- 6.38. As set out in the THVIA, the Proposed Development has full regard for the character and appearance of the area of Reading in which it is located and this is reflected in the form, scale and materials used to articulate the proposed buildings.
- 6.39. The height and scale of the proposed buildings are considered appropriate for this location. The buildings are sympathetic to the neighbouring buildings, whilst also responding to the emerging context of taller buildings in the vicinity. The Proposed Development is consistent with the emerging context of buildings of a greater height in the wider opportunity area. Its massing is well

articulated and it will have a positive relationship with the adjacent buildings, more specifically, the recently consented hotel next to proposed Block C.

- 6.40. The Proposed Development will contribute to the enhancement of Hosier Street and Dusseldorf Way, in terms of providing active frontages and enhanced urban frontage in close proximity to St Mary's Butts, further creating a safe and accessible environment and improving legibility to this part of the town centre.
- 6.41. The proposals have been borne out of an understanding of the historic context of Central Reading, as well as the Council's aspirations for its future. The Proposed Development also aims to make a positive contribution to the existing historic townscape by helping to reactivate Hosier Street/Dusseldorf Way, both in terms of the activity within the building but also improving the street and providing a much more positive view from St Mary's Butts and helping to promote and improve access and connectivity.
- 6.42. It is therefore considered that the amended design of the Proposed Development is in accordance with the NPPF and adopted Local Plan Policies EN1 and EN6 and is therefore considered acceptable in heritage and archaeology terms.

Residential Standards

- 6.43. Local Plan Policy H5 states that new build housing should be built to the following standards:
- All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standards;

- All new build housing will be accessible and adaptable in line with M4(2) of the Building regulations where it is viable, unless it is building in line with M4(3).
- On developments over 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations.

- 6.44. Local Plan Policy CR6 states that all proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of the units should be 1 bed/studios, and a minimum of 5% of units should be at least three bed, unless it can be clearly demonstrate that this would render a development unviable.
- 6.45. Section 5.1 of the Minster Quarter Area Outline Development Framework notes that as a guide, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed.
- 6.46. As set out above, the Proposed Development seeks to provide 446 units comprising 217 (49%) 1 beds, 207 (46%) 2 beds and 22 (5%) 3 beds across the Site.
- 6.47. The scheme will also deliver 5% of the dwellings as wheelchair accessible in accordance with Policy H5.
- 6.48. Although policy indicates that new build housing within Central Reading are not required to meet nationally-described space standards, where units within the Proposed Development do not meet these standards they have been carefully laid out to make the most efficient use of the units.

- 6.49. It is therefore considered that the scheme provides an excellent standard of residential accommodation for all tenures, in accordance with relevant national and local standards, specifically Local Plan Policies H5, and CR6.

Residential Density

- 6.50. Local Plan Policy H2 notes that the appropriate residential densities will be informed by a number of factor, including: accessibility, effective use of land and the character and mix of uses in the area. An indicative density for the Town Centre as set out in Policy H2 is above 100 dwellings per ha.
- 6.51. The scheme proposes a total of 446 dwellings and has a site area of 2.42ha, resulting in a residential density of 184 dwellings per hectare.
- 6.52. It is considered that the Proposed Development optimises the development potential of previously developed land in an area of Reading where land is at a premium, whilst delivering a scheme of exceptional architectural quality, providing 446 much needed residential units towards RBC's housing stock. As such, the scheme is considered acceptable in density terms.

Affordable Housing

- 6.53. Paragraph 62 within the NPPF states where LPAs have identified that affordable housing is needed, they ought to set policies for meeting this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.54. Local Plan Policy H3 requires 30% of the total dwellings be in the form affordable housing on sites of 10 or more dwellings and also notes that in all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken.

- 6.55. The Proposed Development is accompanied by a Financial Viability Assessment (FVA), prepared by DS2 and is submitted as a standalone report. The FVA demonstrates that the scheme delivers the maximum reasonable amount of affordable housing. The proposed provision is expressed as a range between 10% and 20% by unit to reflect the potential for the Council to adjust the rent levels within the affordable housing component to best meet local needs within the confines of the scheme viability. This offer represents between 43 and 89 new affordable homes to be constructed as part of the development on-site. The FVA will be the subject of an independent third party review on behalf of the Council as part of the determination process.
- 6.56. For the reasons provided above, the proposed affordable housing offer represents the maximum reasonable amount that can be delivered by the development. The Proposed Development is there for in accordance with the NPPF and Local Plan Policy H3.

Private Amenity and Public Realm

- 6.57. The NPPF sets an aim to ensure that developments incorporate green and other public spaces as part of the development (paragraph 127).
- 6.58. Local Plan Policy EN9 states that all new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions towards provision or improvement of existing leisure or recreational facilities.
- 6.59. Local Plan Policy H10 indicates that in the past the council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guidance for proposals:
- For Flats outside Central Reading
 - 1 and 2 bedrooms: 25 sqm per flat

- 3 or more bedrooms: 40 sqm per flat
 - Developments in Central Reading will not always be expected to comply with standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.
- 6.60. As set out in the amended Landscape Strategy, the Proposed Development will deliver communal amenity space at podium level for Blocks A, B, and C, and communal amenity space at roof level for residents of that Block E. The amenity space includes both hard and soft landscaping and informal children's play area.
- 6.61. The Proposed Development also seeks to deliver improvements to the public realm in and round the Site through S106 contributions. This includes improvements to Dusseldorf Way and Queens Walk, and the introduction of greening at roof level of the multi-storey car park in the form of pergolas with planting.
- 6.62. The Proposed Development will include residential entrances at South Court, Dusseldorf Way and Queens Walk, in addition to outward facing retail units. The proposed public realm works will significantly improve the appearance of the Site and surrounding area, assisting with the wider regeneration vision for the West Side Opportunity Area.
- 6.63. Given the significant public realm improvements along Dusseldorf, Queens Walk and the introduction of increased and improved private amenity space within the Site and in line with supporting paragraph 4.2.33 of the Reading Borough Local Plan, it is considered that the Proposed Development meets the requirement for the provision of open space that meets the needs of the residents/occupiers of the development.

- 6.64. It is therefore considered that the Proposed Development is in accordance with Local Plan Policies EN9 and H10.

Transport and Servicing

- 6.65. At a national level, the NPPF states that development should take opportunity to promote walking, cycling and public transport use (see Paragraph 102).
- 6.66. Local Plan Policy TR1 states that planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through the provision to encourage walking, cycling, and the use of public transport.
- 6.67. Local Plan Policy TR5 notes that developments should provide car and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 6.68. Local Plan Policy CC5 requires developments to include adequate, well-designed space to facilitate waste storage, refuse, recycling and composting.
- 6.69. A Transport Assessment, prepared by Connect accompanies this application and is supported by a Travel Plan. The Transport Assessment demonstrates the acceptability of the Proposed Development in respect of the effect of the proposals on the local highway network, specifically in relation to the approach to car parking, deliveries and servicing.
- 6.70. The Site contains an existing multi-storey car park which comprises 787 car parking spaces, spread across three floors. The car park is publicly accessible and operates 24 hour, seven days a week.

Car Parking

- 6.71. RBC's Revised Parking Standards and Design SPD (October 2011) provides the residential car parking requirements for Reading. In Zone 1, the SPD suggests 0.5 space for 1-2 bed dwellings and 1 space for 3+ bed dwellings.
- 6.72. As set out above, given the accessibility of the Site, no car parking is proposed other than 22 disabled parking spaces within the existing Broad Street Mall multi storey car park.
- 6.73. It is proposed that 93 car parking spaces within the existing car park will be lost in order to facilitate residential cores, the introduction of accessible parking spaces, cycle parking for Block E and realignment of vehicular routes.

Cycle Parking

- 6.74. RBC's Revised Parking Standards and Design SPD (October 2011) provides the residential cycle parking requirements for Reading. 0.5 cycle parking spaces are required for 1-2 bed dwellings and 1 space for 3+ dwellings. As set out in the Transport Assessment and in accordance with RBC policy, 234 secure cycle parking spaces are provided for residents within the basement of Blocks A, B and C, and externally on top of the multi-storey car park adjacent to Block E. A summary of the number of cycle spaces provided for each block is set out in the table below.

Building	Number of Cycle Parking Spaces
A	84
B	69
C	51
E	30
TOTAL	234

Table 6: Proposed Cycle Park Spaces

- 6.75. Cycle storage for Blocks A, B and C are accessible from the circulation cores. Bicycles can be brought through the main entrance lobbies at ground level and taken down to basement via the passenger lifts.
- 6.76. Cycle storage for Block E will also be accessible from the circulation core. Bicycles can be brought through the main entrance lobby at ground and taken to the car park roof deck via the passenger lifts.

Servicing

- 6.77. In accordance with RBC Local Plan Policy CC5, the Proposed Development includes adequate space in the basements of each of the blocks for refuse facilities as detailed in the Design and Access Statement submitted in support of the planning application.
- 6.78. On this basis, it is considered that the Proposed Development is in accordance with the NPPF and adopted Local Plan Policy CC5 and is therefore considered acceptable in transport and servicing terms.

Energy and Sustainability

- 6.79. Paragraph 154 of the NPPF states that local authorities should approve applications if its impacts are (or can be made) acceptable. In accordance with Paragraph 154 of the NPPF, the Proposed Development takes into account layout and massing to minimise energy consumption.
- 6.80. Local Plan Policy H5 indicates that all major new build housing should be built be designed to achieve zero carbon homes, unless it can be clearly demonstrated that this would render a development unviable
- 6.81. Local Plan Policy CC4 states that in meeting the sustainability requirements of this plan, developments of more than 20 dwellings and/or non-residential development over 1,000 sqm shall consider the inclusion of decentralised

energy provision within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.

- 6.82. Local Plan Policy CC3, notes that all developments will demonstrate how they have been designed to incorporate measures to adapt climate change.
- 6.83. Sustainability and environmental performance are integral to the Development's design and the Proposed Development responds to a number of key sustainability objectives.
- 6.84. An Energy Statement has been prepared by Hoare Lea and is submitted in support of the amended planning application. The Energy Statement makes use of the 'Be Lean, Be Clean, Be Green' energy hierarchy. In relation to the Proposed Development, it is demonstrated that the design proposals, with a contribution achieves zero carbon.
- 6.85. A range of sustainability design measures have been incorporated into the Development. This will be achieved by designing the buildings to have high standards of insulation to minimise the energy uses and using low carbon technologies.
- 6.86. The Proposed Development is therefore considered to be in accordance with the NPPF and adopted Local Plan Policies CC3 and CC4.

Environmental Consideration

Air Quality

- 6.87. Paragraph 181 of the NPPF further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).

- 6.88. Local Plan Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 6.89. The effect of the Proposed Development on air quality has been assessed at a number of sensitive locations around the Site. The Air Quality Assessment contained within the Environmental Statement concludes that construction works have the potential to create dust and the relevant mitigation measures should therefore be put in place. It is not considered that the Proposed Developments including the cumulative effects with committed developments will have a significant impact with regards to air quality.
- 6.90. For the reasons above, the Proposed Development accords with the NPPF paragraph 181 and Local Plan Policy EN15.

Archaeology

- 6.91. The Site does not contain any nationally significant relevant designated heritage assets, or any relevant known undesignated heritage assets. The Site is located immediately adjacent to an Archaeological Priority Area and Local Plan Policy EN2 requires the assessment of the archaeological impacts of development proposals to be submitted as part of the planning application submission.
- 6.92. The accompanying Archaeological Report contained within the Environmental Assessment concludes that there is low probability of archaeological remains within the Site.
- 6.93. Given the above, and subject to appropriately worded planning conditions, the Development is consistent with the guidance set out in the NPPF and Local Plan Policy EN2.

Daylight, Sunlight and Overshadowing

- 6.94. Paragraph 127 of the NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future users of place. Furthermore, national guidelines for daylight and sunlight issues are contained within BRE guidelines, local policy refers to these guidelines as the accepted standard.
- 6.95. Local Plan Policy CC8 states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residents.
- 6.96. A Daylight and Sunlight Assessment has been prepared by Avison Young (included within the Environmental Statement), which includes a detailed technical analysis to quantify the effect of the proposed development upon the daylight and sunlight amenity to the existing properties.
- 6.97. The Daylight and Sunlight Assessment concludes that the majority of properties assessed will experience negligible effects. It is considered that most meaningful development within an urban location will result in instances of moderate and major effects to sensitive neighbours and therefore may be unavoidable.
- 6.98. Where transgressions of BRE guidance do occur in general, the retained levels are considered to be close to the guideline criteria, considered commensurate with an urban location or as a result of low existing levels. Furthermore, in several instances where losses occurred, it was to bedrooms which are considered to be less significant in terms of daylight and sunlight, such as bedrooms.
- 6.99. In terms of overshadowing, the majority of external neighbouring amenity areas will not experience significant overshadowing. The overshadowing assessment indicates that additional overshadowing will be experienced

during isolated periods of the day and these are considered to be minor adverse effect. Seen within the context of an urban environment, the high level of compliance is considered to be in accordance with the BRE guidance.

- 6.100. It is therefore considered that the Proposed Development is considered acceptable and in accordance with the NPPF Paragraph 127 and Local Plan Policy CC8.

Noise and Vibration

- 6.101. Paragraph 170 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 6.102. Paragraph 180 within the NPPF states that planning decisions should aim to avoid noise giving rise to adverse impacts on health and quality of life as a result of new development.
- 6.103. Local Plan Policy CC8 states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residents.
- 6.104. The Development has been designed to avoid noise that could adversely impact on health and quality of life and mitigate and minimise any adverse impacts arising from noise associated with the Development.
- 6.105. An assessment of likely noise and vibration was undertaken as part of the Environmental Statement. In order to assess likely noise levels, a baseline for noise and vibration levels was established on the Site and surrounding areas. An assessment was made of the likely noise and vibration resulting from demolition and construction and design aims for plant and services associated with the Proposed Development were established.

- 6.106. The assessment confirms that changes in noise levels due to construction traffic are likely to be negligible (not significant). It is expected that the significance of the noise and vibration effects of the construction phase of the development could be minor to negligible (not significant).
- 6.107. Considering noise and vibration impacts, the Noise Impact Assessment feeding into the Environmental Statement concludes that during the operational phase of the Proposed Development, the noise and vibration effects of associated road traffic, on-site activities and fixed plant on roofs are negligible (not significant).
- 6.108. The above demonstrates that the Development fully accords with the NPPF (Paragraphs 170 and 180) and Local Plan Policy CC8.

Wind Microclimate

- 6.109. The assessment of wind conditions requires a standard against which the measurements can be compared. The Wind Microclimate Report contained within the Environmental Statement uses the Lawson Comfort Criteria, which have been established for over 30 years.
- 6.110. For the existing site, the wind microclimate at the Site and surrounding area are suitable for sitting use to strolling use during the windiest season.
- 6.111. Wind conditions at and surrounding the Proposed Development would generally range from suitable for sitting use and strolling use during the windiest season.
- 6.112. The amended proposed landscaping scheme would provide beneficial shelter along Queen's Walk, where wind conditions would be generally suitable for standing use during the windiest season. All the main entrances to the Proposed Development would have wind conditions suitable for standing use or calmer during the windiest season. With the landscaping scheme in place,

wind conditions at ground level would be generally suitable for the intended uses at and surrounding the Proposed Development in the context of the existing surroundings.

- 6.113. Wind conditions at ground level would generally be one category calmer during the summer season, ranging from suitable for sitting use.
- 6.114. No instances of strong winds exceed the 15 m/s threshold for more than 2.2 hours per year would occur at ground level. Where instances do occur at podium level, mitigation measures are set out where necessary. This is assessed in more detail in Chapter 10 of the Environmental Statement.

Flood Risk and Drainage

- 6.115. The NPPF and accompanying National Planning Practice Guidance (NPPG) set out the Government's national policy on development and flood risk and seeks to provide clarity on what is required at regional and local levels to ensure flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk. The NPPF outlines a risk based approach to the planning process and requires a Sequential Test is used in cases where sites are located in vulnerable flooding zones to guide the decision making process by steering development to areas with the lowest probability of flooding where feasible.
- 6.116. The NPPG also provides details of how all new development must include appropriate consideration of the potential effects of climate change on flooding and the hydrological regime, within the Flood risk assessments: climate change allowances (last updated February 2017). The NPPG refers to the Environment Agency's Guidance to support the NPPF. Depending upon the specific River Basin District that the proposed development site lies within, the guidance indicates precautionary increases in fluvial flows, sea levels and

rainfall intensities that should be applied when assessing the risk of flooding, from now until 2115.

- 6.117. Local Plan Policy EN18 notes that development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF.
- 6.118. As set out in the accompanying Flood Risk Assessment and Drainage Strategy, the Site contains Broad Street Mall and is brownfield in nature and 100% impermeable.
- 6.119. The Site is in an area designated as Flood Zone 1 and lies in an area classified as 'low' risk of surface water flooding.

It is therefore considered that the Proposed Development is in accordance with Local Plan Policy EN18.

7. CIL AND PLANNING OBLIGATIONS

Community Infrastructure Levy

- 7.1. CIL is a tariff chargeable by Reading Borough Council on new development following 1 April 2015. In relation to the Site, CIL is charged at £120 per sqm (GIA) for C1 Use Class and £0 for A1/A2/A3/A4 Use Class.
- 7.2. The Proposed Development is therefore CIL liable and a CIL payment would be made as part of the Proposed Development.

S106 Obligations

- 7.3. The Scope of the scope of any prospective Section 106 Agreement will be subject to further detailed discussions during determination of the application. Obligations will be in accordance with Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended), which are:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 7.4. Reading Borough Council has an adopted Planning Obligation SPD. In listing the draft Heads of Terms below, regard has been had to the Planning Obligations SPD (April 2015). It is proposed that the Section 106 Agreement may contain planning obligations which could secure obligations for the following:
- Securing the affordable housing provision;
 - Employment and Training Strategy for the construction and operational phase of the Proposed Development;
 - Travel Plan;
 - Public Realm Improvements;
 - Carbon offset payment;

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- Other site specific mitigation measures required by the Environmental Statement; and
 - Monitoring and implementation.
- 7.5. The negotiation of the above detailed obligations will have regard to all relevant site specific constraints and considerations, any CIL liability and the overall viability of the Proposed Development.
- 7.6. These Draft Heads of Terms are provided without prejudice.

8. CONCLUSION

- 8.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.2. This Planning Statement assesses the amended Development against the Development Plan and other relevant national and local planning policy and guidance.
- 8.3. The revisions to the planning application are submitted following consideration of the consultation responses received from statutory consultees and following meetings with Reading Borough Council (RBC) and Design South East (DSE).
- 8.4. In response to feedback received from RBC and DSE, the design has been revised both externally and internally. The resulting elevations and buildings above Broad Street Mall are well considered compositions, producing a common architectural language across the buildings, combining elegance and simplicity with proportions.
- 8.5. The amendments the new buildings are well designed and the architecture is more ambitious and of significantly greater quality than previously proposed. The Proposed Development will create an active built edge to the street frontage along Dusseldorf Way and Queens Walk.
- 8.6. The amended Proposed Development will result in a number of tangible benefits, including enhanced outward facing retail offer along Dusseldorf Way and Queens Walk, the provision of 446 residential dwelling units, significantly contributing to Reading Borough Council's housing targets, improvements to the public realm along Dusseldorf Way and Queens Walk by way of S106 contribution.

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- 8.7. In addition to the recently approved Hosier Street Hotel, the Proposed Development will act as a catalyst to the regeneration of the wider area.
- 8.8. On the basis that the supporting documents submitted as part of this amended planning application have demonstrated compliance with the requirements of the NPPF and the recently adopted Local Plan, it is therefore considered entirely appropriate to grant Planning Permission for the Proposed Development without delay.