

Greyfriars Church Centre, Friar Street, Reading, RG1 1EH

**Planning Statement
Phase 2 of Development Proposals**

On Behalf of Greyfriars Church

November 2019

BLUESTONE PLANNING
TOWN PLANNING CONSULTANTS
Suite 5 Enterprise Centre,
Buildings 41/42 Shrivenham 100 Business Park,
Majors Road
Watchfield
Oxon SN6 8TZ

T: 01793 782635
E: info@bluestoneplanning.co.uk



Document Issue Sheet

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Author:	J Flawn	Project No:	065 0817 JF
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1 BACKGROUND

- 1.1 Bluestone Planning have been instructed by Greyfriars Church to seek planning permission to redevelop the Greyfriars site as part of a development involving various phases.
- 1.2 As a result of recent pre-application enquiries (see section 4 below for further details) the phasing of the redevelopment of this site has altered in the current application plans as compared to the phasing that was described at the pre-application stage. This is principally due to the very challenging responses received from the planning authority (but notably not Historic England) to the larger development proposals at both pre-application stages.
- 1.3 Notwithstanding this response, the Church has a pressing need to develop on the Greyfriars site.
- 1.4 The proposals that were the subject of the recently approved application are referred to as 'phase 1'. They were the less contentious first phase of the larger originally-proposed development.
- 1.5 This application involves the redevelopment of the Church centre and immediate environs. However, a number of the consultant reports that have been commissioned to support this application look at the wider site and were commissioned on that basis. Dealing with the wider site is part of the long-term plans for the Church.
- 1.6 This statement examines the proposals in the context of the planning history associated with the site, the relevant policies affecting the development of the site and the justification for the proposals.

2 THE SITE AND SURROUNDINGS

- 2.1 The Greyfriars site in totality covers approximately 0.27 hectares (2,680sq.m.). It comprises the Grade I listed Church of Greyfriars, the associated Church centre, the memorial hall and Nos 2-4 Sackville Street.

- 2.2 The site is edged by a number of trees and vegetation on the western and southern boundaries and the area between the Church centre and the Church itself is occupied by a servicing and parking area.
- 2.3 To the west of the application site is an area of stopped up highway land adjacent to the Friar Street / Chatham Street Inner Distributor Road (IDR) junction. It is unkempt and attracts antisocial behaviour.
- 2.4 The site is bounded to the west by the A329 Caversham Road, to the south by Friar Street, to the north by Sackville Street and to the east by Greyfriars Day Nursery and Greyfriars Road beyond.
- 2.5 The area surrounding the application site is in mixed residential and commercial use, with retail and offices forming the majority of the uses to the south and east, residential to the north, and commercial uses north and south of Weldale Street to the west of the IDR junction.
- 2.6 A recent planning application (application reference 170326) approved on the 15th March 2018 permitted 427 (233x1, 182x2 & 12x3-bed) residential units (Class C3) and 1 flexible ground floor retail shop (Class A1) or restaurant and cafe (Class A3) unit together with new public realm, landscaping, accesses, parking and associated works. The development is of a significant scale (maximum 10 stories close to the Church) and construction is expected to start soon.
- 2.7 Other nearby tall structures have been permitted and constructed recently too, for example the Chatham Place development to the south west of the application site which is up to 11 stories in height. All of this surrounding high-rise development has had and will have a significant impact on the setting, and thus the significance, of the Grade I listed Greyfriars Church building.
- 2.8 This area is a focus for regeneration and is identified in adopted and emerging Local Plan documents as the Station / River and West Side Major Opportunity Areas.
- 2.9 The Church's location benefits from significant passing pedestrian traffic from people coming into the town centre from Caversham to the north and the Oxford Road area to the west. This is likely to increase with the planned regeneration to the west and north of the site.

- 2.10 The site lies just 420m to the south west of Reading Train Station, and it is immediately to the west of the main retail areas of Friar Street and Broad Street.
- 2.11 There are numerous public car parks in the vicinity including those at Chatham Place, Garrard Street, Oracle, Broad Street and the Railway Station APCOA car park.
- 2.12 Greyfriars Church is a former Franciscan Friary. It is an Anglican Church and is part of the Diocese of Oxford. The Church is very well attended for Christian worship, and hosts a full programme of Church and community events and programmes during the week. Approximately 400 children and adults attend two Sunday morning services, and approximately 150 adults attend Sunday evening services. Weekday bookings include mothers and toddlers' groups, bible study groups, and prayer meetings, as well as NHS bookings, School groups, Reading Borough Council groups, Alzheimer's groups, Alcoholics Anonymous, and the John Lewis Retirement Fellowship. A third arm of the Church's work is running a Nursery School on the site of the original Vicarage, on the East End of the Church, which is a self-contained secure site, but owned and run by the Church for children of the general public.
- 2.13 Greyfriars' parish stretches northwards towards the River Thames, and is also served by a Church plant, New Hope Community Church.

3 THE DEVELOPMENT PROPOSAL

- 3.1 This application is concerned solely with phase 2 of the wider redevelopment proposals for this site which is to replace the existing church centre with a three-story new church centre building and single storey link building connecting the Centre with the recently approved Greyfriars Church foyer. Phase 2 is depicted in green in the diagram below.

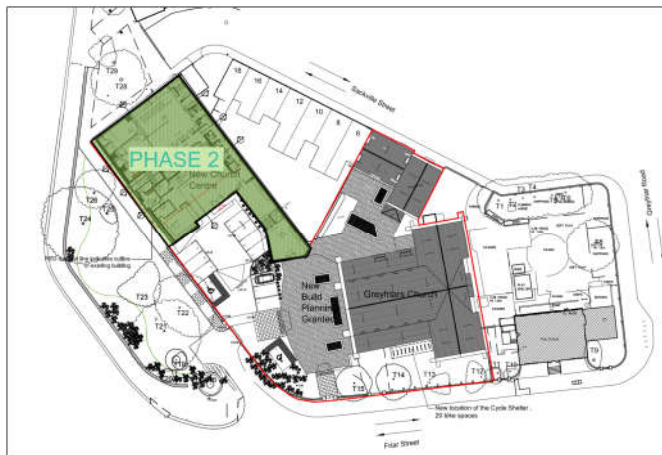


Diagram 1 – Phase 2 Plan

3.2 Phase 2 comprises:

- Re-build a new Church Centre on approximately the footprint of the present Greyfriars Centre
- As regards massing, following from comments received during the pre-application process from the council, the proposed new building follows the lower portion of the 'right to light' envelope established in the early stages of the design process. This has been further adjusted after consultation with Historic England, to further mitigate the degree of perceived overbearingness to the rear of the properties at the north end of Sackville Street.
- Construct a new link structure. The D&A Statement describes this link thus (paragraph 4.8):

"The link is a key element within the Churches safeguarding policy, particularly in terms of moving children around the site. The link is also an important access for the disabled between the church and the church centre which is currently only via the exposed and steeply graded car park. There are many wheel chair users in the church congregation who has made a significant contribution to the design brief, and have been consulted. It is really necessary to have a proper link between the two buildings, with both a staircase, and a lift. For this reason the link has been designed, as an elegant, wide and spacious connection, with a glazed wall so that it is a quality space and not just a basic corridor."

3.3 In terms of the needs identified above, the Statement of Need confirms (p.9-10) that:

“.... The ground, first and second floors of a possible new Centre may provide a large hall and a series of meeting rooms that will be well-suited to the needs of the Sunday children and young people’s groups. (The Greyfriars Nursery building will continue to be used on Sundays for the under-5s for whom it is well equipped.)

- The first floor of the possible new Centre would include a large open-plan church office, with associated meeting rooms. This will allow the whole staff to be co-located in a well-equipped, accessible, modern office space, with some scope for growth.”

3.4 The development will provide the following functionality:

- Three main internal floor levels
- GF comprising entrance foyer, toilets, welcome / refreshments area, kitchen facility, main hall (a multi-purpose room, suitable for Sunday School type groups and a whole range of church and community uses throughout the week).
- FF comprising a church office and meeting rooms, toilets and refreshment making facilities
- SF comprising further meeting rooms, available to the community to hire for any appropriate meetings or activities, as well as for age-group meetings on Sundays.

3.5 The external appearance of the building will be of a partial wedge-shaped structure, with clean elevations faced in stone and with the lower floor set back and differentiated by a strip of glazing.

3.6 The link will be a wide connecting structure with a glazed wall as noted above.

3.7 The total floor areas (m²) for each of the component parts of the proposed church centre building and link are as follows:

Existing Centre.	Totals	GIA	504	GEA	481
Ground floor		GIA	455	GEA	481
		GIA	49		
Proposed Centre.	Totals	GIA	1,487	GEA	1,642
Ground floor		GIA	510	GEA	541
Link		GIA	85	GEA	103
First Floor		GIA	456	GEA	503
2 nd Floor		GIA	419	GEA	466
Roof area access		GIA	27	GEA	29

4 PLANNING HISTORY

- 4.1 The relevant planning history is set out on the online planning authority database.
- 4.2 There are approximately 15 applications recorded but most relate to the Greyfriars Centre / Day Nursery at No 64 Friar Street and are therefore of only passing relevance to this application.
- 4.3 The works to create the meeting room beneath the west end window were carried out in the 1970s. Other minor works to reorganise the car park have taken place in the last thirty years.
- 4.4 Pre-application ref 10-01004-PREAPP sought pre-application advice about the proposed development of a new building. Observations were sent by the LPA on the 20th January 2011.
- 4.5 This application follows two more recent pre-application enquiry responses reference 172036/PREAPP received 4th May 2018 and 181498/PREAPP received 23rd November 2018.
- 4.6 It should be noted that both of the recent the pre-application enquiries referred to a larger project involving approximately four different phases. The previous phase plan is set out below to provide clarity.



Diagram 2 – Original Phasing Plan

- 4.7 The first pre-application enquiry proposed additional internal space, the reconstruction of the church centre as a five storey building, the replacement of the meeting room at the west end of the church, construction of a new link to the church centre, the reconstruction of the car park and hard and soft landscaping to the site and the adjacent parcel of public realm land to the west of the car park and east of the A329 Caversham Road.
- 4.8 The proposals also sought to create an additional 1,047sqm of D1 Use Class – ‘Place of Worship’ Gross Floor Area. In addition, the proposals were also to create one 5-bed, one 2-bed and one 1-bed flat, to be occupied by members of the clergy and / or students studying at the church.
- 4.9 The response to that initial pre-application enquiry was very negative and thus after a re-design the Church made a second pre-application submission.
- 4.10 The second pre-application enquiry made significant changes to the development proposal including revisiting the size of the new openings under the west window, reducing the scale and massing of the Church centre to a three storey structure, alteration to the treatment of the rear of the Sackville Street properties, reduction in the extent of the structure between Sackville Street and the new foyer, alterations to the foyer itself and the link between the new foyer and the new Church centre.

- 4.11 Unfortunately, despite these significant changes, the second pre-application response dated 23rd November 2018 identified further concerns with the proposals.
- 4.12 The applicant took the view that the considerable challenges presented by the Church Centre building, required further work to seek to address the issues raised in the advice from the LPA and Historic England.
- 4.13 As a consequence, they determined to split the proposals into two main phases with the more urgent works forming part of a Phase 1 application covering phase 1 and most of phase 3 in the diagram above. That application (reference 190650) was approved at planning committee on the 8th August 2019.
- 4.14 This current application deals solely with phase 2 in the diagram above and that part of phase 3 which is the link structure adjacent to phase 2.

5 RELEVANT PLANNING POLICY

- 5.1 Planning applications must be determined in accordance with the Development Plan unless considerations indicate otherwise (Section 38(6) of The Planning and Compulsory Purchase Act 2004).
- 5.2 The National Planning Policy Framework (NPPF), published in 2012 and revised in 2018 and 2019, defines the development plan. For the purposes of this application the relevant policies are contained in the statutory development plan, which comprises the Reading Borough Local Plan (adopted 4th November 2019).
- 5.3 This document sets out the Borough's planning policies for development in Reading up to 2036. The recently adopted Local Plan replaces the previous development plan documents - the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document.

National Planning Policy Framework (NPPF)

- 5.4 The NPPF is supported by guidance contained on the Planning Practice Guidance website, a web-based 'living' resource.
- 5.5 Paragraph 7 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. The remainder of the NPPF

is regarded as constituting the government's view of what sustainable development in England means for the planning system. There are three 'objectives' to be achieved with sustainable development – an economic, a social and an environmental objective (paragraph 7).

- 5.6 The economic objective seeks to help build a strong, responsive and competitive economy, the social objective seeks to support strong, vibrant and healthy communities whilst the environmental objective seeks to contribute to protecting and enhancing the natural, built and historic environment.
- 5.7 Paragraph 10 of the NPPF introduces a presumption in favour of sustainable development. Whilst there is a presumption, that presumption does not mean simply granting permission for development, since regard has to be had to each of the three separate objectives of sustainable development, including the protection and enhancement of the natural, built and historic environment.
- 5.8 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
- 5.9 Paragraphs 54-57 confirm that planning conditions and obligations should only be sought or imposed where they meet the relevant tests as described at paragraphs 56 (planning obligations – see also C.I.L. Regulation 122 tests) and paragraph 55 (planning conditions).
- 5.10 Paragraph 92 addresses the needs of communities in securing quality facilities. It explains that:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

5.11 Paragraph 109 deals with the transport effects of development. It states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

5.12 Paragraph 124 of the NPPF explains that good design is a key aspect of sustainable development. Amongst other things, planning decisions should establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; and it should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

5.13 Paragraph 131 urges planning authorities to be aware that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

5.14 Paragraphs 149-154 support the development of low carbon technologies and seek to increase the use and supply of renewable and low carbon energy.

5.15 Paragraph 175 addresses the biodiversity implications of development, stating

"When determining planning applications, local planning authorities should apply the following principles:

.....if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less

harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.....”

5.16 Paragraph 180 addresses impacts on amenity. It advises that

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”

5.17 Planning authorities are reminded at paragraph 189 that in determining applications, applicants should be asked to describe the significance of any heritage assets affected, including any contribution made by their setting.

5.18 Paragraph 192 confirms that planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets in determining planning applications, and that they should take account of the positive contribution that the conservation of heritage assets can make to sustainable communities. It also advises that the desirability of new development making a positive contribution to local character and distinctiveness should also be taken into account.

5.19 Great weight should be given to the asset’s conservation when considering the impact of development on the significance of a heritage asset. The more important the asset, the greater the weight should be, according to paragraph 193.

5.20 Paragraph 195 addresses the implications of proposals that lead to ‘substantial harm’. It states:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

5.21 Paragraph 196 advises

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

5.22 At paragraph 200 planning authorities are asked to look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Faith and Planning Policy

5.23 The ‘Faith Groups and the Planning System Policy Briefing’ (October 2015) makes a number of recommendations including urging local planning authorities to develop greater understanding of how faith groups use space, which includes recognition of the differences between and within faith groups themselves.

5.24 To facilitate this, specific guidance on how faith groups use space needs to be made available, the briefing explains, e.g. through supplementary planning documents that reflect the contemporary religious landscape. Generating such guidance may benefit from collaboration with the relevant professional bodies and faith groups it goes on to explain.

5.25 Page 7 of the briefing paper examines the interaction of the planning system with faith and religion:

“As well as addressing how planning in its current form might be applied more flexibly, the FPN noted a number of areas of planning law and policy that might be reviewed, with a view to easing the difficulties faced by faith groups when dealing with the planning system. Where not detrimental to the wider public interest, we recommend the following:

- Given the scarcity of non-residential premises (i.e. D1 use class) in many of our towns and cities, local planning authorities should prioritise protecting space for social infrastructure, including places of worship. This should also be a consideration in any future review of use classes.....*
- Local planning authorities should assess the social infrastructure needs arising from new developments, including provision for places of worship. Such an approach will further enable local planning authorities to move towards a*

proactive mode of needs provision. For example, this might be achieved through a minimum space allocation per population beyond a certain trigger point, as has been seen in creative practice case studies (e.g. Cambridgeshire Horizons, 2008), and as is the case in other types of land use.”

5.26 Both the NPPF and the Faith and Planning Policy document are important material considerations in determining the appropriateness of the current development proposals.

Reading Borough Local Plan (adopted November 2019)

5.27 The following policies are material to the determination of this application:

- CC1 Presumption in Favour of Sustainable Development
- CC2 Sustainable Design and Construction
- CC3 Adaptation to Climate Change
- CC6 Accessibility and Intensity of Development
- CC7 Design and the Public Realm
- CC8 Safeguarding Amenity
- CC9 Securing Infrastructure
- EN1 Protection and Enhancement of the Historic Environment
- EN2 Areas of Archaeological Significance
- EN5 Protection of Significant Views with Heritage Interest
- EN6 New Development in a Historic Context
- EN12 Biodiversity and the Green Network
- EN14 Trees Hedges and Woodland
- EN17 Noise Generating Equipment
- TR3 Access, Traffic and Highway Related Matters
- TR5 Car and Cycle Parking and Electric Vehicle Charging
- OU1 New of Existing Community Facilities
- CR2 Design in Central Reading
- CR3 Public Realm in Central Reading
- CR4 Leisure Culture and Tourism in Central Reading
- CR9 Terraced Housing in Central Reading

5.28 Policies CC1 deals with the central requirement to achieve sustainable development.

5.29 Policies CC2 and CC3 set out a series of requirements for buildings to deliver a building that meets the appropriate environmental design standards, and to adapt to climate change respectively. The proposals have been designed to achieve an appropriate BREEAM level at this stage of the process with the intention to work towards achieving 'very good' across the entire redevelopment of the Greyfriars site in due course. The D&A statement notes (section 6.1) that "Some of the features will include:

- High standards of insulation of walls, windows and roof structure
- Air source heat pump heat source
- Solar panels on the roof
- Heat recovery ventilation
- Occupancy controls for both heating and lighting, so that when not in use rooms or zones do not have to be lit or heated to occupancy standards
- There will be a high thermal mass in the thick, solid floors to retain heat or cooling
- There will be L.E.D. lighting throughout
- Electric charging points and cycle racks will be provided
- There is excellent and frequent public transport connectivity within Reading and beyond by bus or train, or car

5.30 Policy CC6 seeks to ensure that higher density development is located in areas with good accessibility. The application proposal is in a highly accessible location with excellent access to bus and train services as noted in section 2 above.

5.31 Policies CC7, 8 and 9 are detailed criteria-led policies which developments will be measured against in considering amenity, design, and infrastructure. The proposals have been developed over several years and in detailed consultation with the key stakeholders in this context – Historic England, SPAB, the planning authority, the Highway authority and the conservation consultant acting for the LPA. The proposal represents the culmination of this ongoing dialogue and is considered to comply with these policy requirements.

5.32 Policies EN1, 2, 5 and 6 deal with the effect of development on the historic environment including archaeology. Significant work has been undertaken by the applicants to inform discussions with the above consultees and this application represents the optimal solution to the need to replace the Church Centre with a modern

building that respects the significance of the Grade I Greyfriars Church and which enhances, rather than detracts from, the setting of this important listed building.

- 5.33 Policies EN12 and EN14 deal with the effect of development on biodiversity and trees. The application is supported by technical reports which demonstrate that the objectives of both policies are satisfied.
- 5.34 Policy EN17 deals with noise. The acoustic report submitted with this application makes recommendations for mitigation to address the effects of this proposal satisfactorily.
- 5.35 Policies TR3 and TR5 deal with parking provision and safe access to facilities. The proposals will continue to provide safe access for pedestrians, cyclists and drivers, consistent with this policy requirement. Electric charging points can be dealt with by planning condition where necessary.
- 5.36 Policy OU1 supports the improvement of existing community facilities. It advises that *“Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan.”*
- 5.37 The proposals rely on this policy support which is critical in recognising the value that the proposed church centre can bring to the community in Reading. This is endorsed by policy CR4 which emphasises the importance of cultural facilities being primarily located in the Central Core of Reading.
- 5.38 Policies CR2 and CR3 deal with design and public realm in Central Reading respectively. The design and appearance of this important building will be a positive addition to the locality. It has been designed so that the architectural details and materials used are of a high quality and respect the form and quality of the detailing and materials in the vicinity of the development site.
- 5.39 Sackville Street is a protected terraced area (policy CR9). The application proposals will not result in a loss, or have a detrimental effect on the character of, this street.
- 5.40 The proposals are therefore considered to accord with the policies of the Local Plan. Development should be determined in accordance with the policies of the Local Plan unless material considerations indicate otherwise, and there is nothing that would indicate that a different decision should be made in this case.

Supplementary Planning Documents

- 5.41 Regard has been had to the Sustainable Design and Construction SPD and the Employment Skills and Training SPD.
- 5.42 The development is likely to be completed so that it meets BREEAM 'Very Good' level and this matter is addressed in some detail in the submitted BREEAM assessment documents. The proposals are considered to comply with the Sustainable Design and Construction SPD as a result.
- 5.43 The need for an employment, skills and training plan, arising from the Employment Skills & Training SPD, is noted and can be conditioned as appropriate should the application be recommended for approval.
- 5.44 It is likely that the skills and training plan will adopt a series of key performance indicators that can be measured to determine whether the development is effective in training people locally, such as:
- Work placements
 - Jobs created
 - Construction careers information, advice and guidance
 - Training weeks on site
 - Qualifying the workforce
 - Training plans

6 PLANNING CONSIDERATIONS

Above Ground Heritage

- 6.1 The initial pre-application response from the LPA confirmed that *"With regard to curtilage listing it is not considered that the modern structures within the site (the existing 1980's Church centre and temporary cabins) would form part of the listing nor are the Sackville Street properties, which are a separate planning unit, listed. Any structures physically attached to the grade I listed Church are considered to be listed. However, given the relevant ecclesiastical exemptions the Diocese is asked what they see as curtilage listed on the site."*
- 6.2 This scheme has been revised from the previous proposals to ensure that the key effects of the development result in minimal harm to the significance of the Grade I listed Church and its curtilage structures. Where harm may be considered to arise, the

benefits (including public benefits) associated with the proposed development are considered to outweigh such harm.

- 6.3 In this context, the NPPF (189-200) and Local Plan policies EN1, EN2 and EN6 are key because they deal with the primary material planning consideration – the impact of the development proposals upon the historic fabric and setting of the Grade I listed Church and associated curtilage structures.
- 6.4 Policy EN1 explains that all proposals will be expected to protect and where appropriate enhance the significance of heritage assets and their settings, and the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.
- 6.5 Policy EN2 extends the above-mentioned requirements to include an assessment of sites of archaeological significance as well. Policy EN6 requires applicants to give consideration to the historic character of an area and indicates that the LPA will have regard to a number of detailed criteria.
- 6.6 The application is accompanied by a detailed heritage impact statement that specifically addresses these matters as well as an archaeological assessment that deals with the policy EN2 issues. Various technical reports have already been prepared to address the specific issues that these policies identify, including a statement of significance and a statement of need – both are submitted in support of this application.
- 6.7 The Statement of Significance concludes (see the executive summary on p.3 of that report) that overall the Church building is of high significance as the most complete surviving example of a friary Church in England. However, its ancillary buildings are of poor quality and no significance; they make poor use of the site and detract from the west end of the friary Church with its huge and nationally important medieval west window.
- 6.8 The Greyfriars Centre itself is described as having no significance. The statement of significance explains (section 6.7) that the building was built between “1981-3 by J Alan Bristow in dark brick with tiled roofs. Composed of two linked parts; a large hall, kitchen and cafe to the south, and a smaller series of meeting rooms with a

*bookshop to the north. Functional but of limited architectural merit and no historic importance. **No significance.***

- 6.9 The Statement of Significance also notes (p.13) that “....*the setting of the church is therefore entirely urban; there is no churchyard in the traditional sense and within the site boundaries only the area between the south aisle wall and the boundary wall to the south is grassed. There is a small triangle of land to the south west of the car park that is also grassed and has several mature trees; this obscures most of the south west end of the church site and therefore all the bulk of the Greyfriars centre from principle public approaches along Friar Street from the west.*”
- 6.10 In the context of the above the proposals focus on removing a modern structure which is of no significance and replacing it with a modern structure which will, in the applicant’s opinion, enhance the setting of the Church and thus will deliver a positive benefit to the significance of the Church.
- 6.11 Any harm that may be perceived must be balanced against the public benefit of better revealing the exterior of the west end of the Church and removing a tired and unattractive 1980s building and replacing it with a modern and high quality building.
- 6.12 The heritage impact statement concludes (page 29) that the impacts that arise as a result of the proposed works are archaeological disturbance of the ground, exposing the foundations of the earlier Victorian school and potentially also earlier remains; and the impact on the setting of the church and the west window. It explains that the mitigation measures include using the landform (the centre building being lower) to mitigate height; locating the new building as close as possible to that of the old, maintaining maximum distance from the historic church building; and improving the material quality of the new building over the existing.
- 6.13 It explains that whilst the glimpsed view of the church currently possible from the ring road approach from the west between the two roof planes of the church centre will be lost altogether, this is not a significant view.
- 6.14 The impacts identified in the heritage impact statement can all be mapped across to either ‘no harm’ or ‘less than substantial harm’ in NPPF terms. Consequently, in carrying out the heritage planning balance, the public benefits of the proposals are considered to significantly outweigh any harm arising from the development. The

proposals are therefore considered to be compliant with the requirements of the NPPF and the adopted Local Plan.

- 6.15 JBKS Architects has also had an on-going conversation with Richard Peats from Historic England, who is retained by Greyfriars Church on their new consultancy arrangement to assist clients like Greyfriars to come to historically acceptable solutions. As a result of this dialogue the application is submitted with the endorsement of Historic England, having been designed in consultation with them over the last 18 months.

Archaeology

- 6.16 In 2012 an archaeological evaluation was made on-site focussing primarily on the car park area to the west of the Church. The report that followed these investigations concluded:

“The evaluation has identified the presence of Medieval and Post medieval / Modern stratified deposits within the site. A large cut feature [3019], present in Trench 3, probably dated to the Medieval period, although its form and function remained unclear. Another large cut [208], situated in Trench 2, was poorly dated, although it was visually distinct from Feature [3019] and was not necessarily related to it. Trenches 1 and 3 contained numerous tip layers, which suggested that the site had been utilised as a dump and/or had been intentionally levelled-up. The associated dating evidence indicated that this activity was likely to have occurred in the later Medieval to Post medieval / Modern periods.

In light of the evidence for dumping within the study area, further analysis of the recovered artefactual and environmental evidence is unlikely to yield information relating to former on-site activities. No further analysis is recommended at this stage.

.....Due to the presence of archaeological deposits within the site it is recommended that further archaeological works, in the form of strip, map and sample recording and/or watching brief, are undertaken in the areas of proposed development excavations, which are likely to penetrate to the top of archaeologically significant levels.”

- 6.17 The 4th May 2018 pre-application response stated that a full archaeological desk-based assessment would need to be completed as a first step in order to assess the impact of the proposals on archaeological remains. In order to further evaluate the potential impact of the development on archaeological remains, and ensure that appropriate mitigation of these impacts is possible, including preservation in situ if necessary, it went on to advise that it may be necessary to undertake field work in the form of an evaluation prior to any application being submitted.

6.18 Since the last application a revised desk-based assessment of the development proposals has been commissioned. It has concluded that

“12.1.1 The site is situated adjacent to Greyfriars Church at the edge of Reading’s medieval settlement. The site has been continuously occupied from at least the twelfth century. Within the surrounding environs of the site finds of prehistoric date through to the modern period have been identified including civil war defences.

12.1.2 The site is currently occupied by the Greyfriars Centre, portacabins and tarmacadam car park. A previous archaeological evaluation within the site indicates the survival of archaeological remains of medieval and post-medieval date across the site and ground works associated with the scheme will impact upon these.

12.1.3 It is considered that no further archaeological work will be required at this stage to inform the planning application however due to the potential for groundworks to impact upon below ground archaeological remains it is anticipated that a programme of further archaeological work will be likely to be required as a condition of planning. This would probably include/involve further investigation and excavation of archaeological deposits within the development footprint. A condition for archaeological monitoring or an evaluation was attached to the recently approved first phase of works within the site. Berkshire Archaeology have been contacted to find out the scope for the further works and OA are currently waiting for their response.

12.1.4 The scope of any further archaeological work for this phase of development will need to be agreed with Berkshire Archaeology.”

6.19 An addendum to the Assessment has been produced just prior to submission of the application. In the addendum the following comments record the discussions between Berkshire Archaeology and Oxford Archaeology:

“BA have indicated that a similar (post-determination) condition to that attached to Phase 1 would be required for Phase 2. It is likely therefore that a phased programme of archaeological works will be required as a condition of planning. This would be likely to involve an archaeological evaluation to be carried out after the demolition of the existing building to assess the archaeological survival and the level of damage caused by the piling within the footprint of the existing building.”

6.20 Therefore, taken together (the 2012 and 2019 studies) it can be concluded that the site has been assessed through a desk-based assessment, and a series of on-site investigations have been carried out, both of which indicate that any further investigatory works can be conditioned and where necessary a watching brief approach applied (discussions are ongoing to agree this for the first phase works and

this can be easily extended to cover phase 2). There is no need to undertake any further pre-application investigations as far as the applicant is aware.

Need

6.21 The Statement of Need accompanying this application provides the following explanation of the need for the proposals (see page 7):

The buildings surrounding the church, which date from the early years of the 20th century, the 1970s and the 1980s, were visionary responses to the ministry needs of their time. However, although between them they provide a considerable amount of space we have largely outgrown our facilities. The site is disconnected and fragmented, inflexible, and deficient in a number of key respects. There has been a vision since the mid 1990's to see the ministry of develop. The reordering, establishment of New Hope Community Church and Greyfriars Nursery have been stages in the journey.

Greyfriars' Vision is to see Reading changed by the love and power of Jesus. This involves us focusing on three things: equipping our people; reaching out to those who live and work alongside us; and resourcing the wider church. Our buildings need to serve and be adequate for this Vision.

6.22 The Statement of Need identifies a number of components of community need, which can be summarised as follows:

- Public accessibility
- Sunday fellowship space
- Offices
- Improved toilet facilities
- Sunday children/young people's groups
- Outreach and serving the community
- Weekday/Saturday use of the Church
- Prayer room

6.23 The site as a whole is used by a range of different groups and the following diagram shows this very clearly:



6.24 This shows that whilst the Church groups are important users of the facilities, for a significant proportion of the time the facilities are in use for non-Church purposes.

6.25 Local Plan policies OU1 and CR4 support the provision of new or improved facilities to meet the community's needs, and this is echoed in the NPPF at paragraph 92 in particular. The proposals are considered to fully accord with the policies in the development plan and national planning policy.

Biodiversity

6.26 The preliminary bat roost assessment conducted in October 2017 concluded (section 5.1) that:

"On balance, the presence of roosting bats is considered unlikely. However, even if the Memorial Hall or Church were used by bats it is unlikely that the proposals would lead to disturbance. The proposals involve no direct effects on either building and lighting levels are likely to be similar to those that currently exist."

Survey results suggest protected species do not form a constraint to development of the site and the requirement for further surveys appears unwarranted. In the unlikely event that evidence of roosting bats is found during future development works, construction activity should cease and further ecological advice sought."

- 6.27 Subsequent discussions with the surveyor confirmed at the time that no further survey work was required. However, since then a further study has been undertaken (February 2019) and accompanies this application. It concludes (section 5) that

“Ecological assessment of the Greyfriars site has taken place on two occasions: in October 2017 (Preliminary bat roost assessment); and January 2019 (Extended phase 1 habitat survey to inform BREEAM pre-assessment). No evidence to suggest the presence of protected species or notable habitats was found during visits and as such, redevelopment of the site would be expected to be compliant with legislation relating to the protection of species and habitats.

Notwithstanding this, pre-construction checks would be required to ensure the absence of groups, such as breeding birds, during site preparation activities including vegetation clearance.”

- 6.28 The report makes various recommendations including recommending that tree loss is minimised and additional planning carried out to encourage invertebrates. It also recommends the installation of bird boxes, a green roof and a water feature.
- 6.29 In light of the above it is likely that the scheme will be compliant with the requirements of NPPF paragraph 175 and Local Plan policy EN12.

Transport / Traffic / Parking

- 6.30 The Helix Transport Consultants report dated October 2019 summarises the assessment work undertaken to examine the highways, traffic generation and parking requirements.

- 6.31 It sets out findings on traffic generation at section 5.3:

“5.3.1 According to the above, there may be an increase in weekday peak hour trips of 2 people movements in the AM peak and 0 people movements in the PM peak.

5.3.2 Given the above, the estimated impact on Reading’s Transport Networks is considered to be negligible.

5.3.3 For the reasons given in section 5.1, the proposed redevelopment is not expected to have any significant effect on a Sunday, the site’s busiest period.”

- 6.32 The report concludes that

“7.1.4 The site is in a highly sustainable location which offers visitors a range of non-car travel options.

7.1.5 It is concluded that there are no valid highways or transportation reasons to prevent this proposed development.”

- 6.33 As a consequence, Local Plan policies TR3 and TR5 and NPPF paragraph 109 are considered to be addressed.

Landscaping / Trees

- 6.34 The submitted BS5837 Tree Survey by BJ Unwin Forestry Consultancy (October 2019) makes recommendations about several trees on site that would be affected by the proposed development. The recommended actions are set out in the table on pages 14-15. The report recommends that Planes T25 & T26 need trimming back from existing and proposed building to allow ample construction access. Furthermore, construction access will require travelling across rootzones of London planes T22, T25, T26 & T28. Temporary ground protection will also be needed.
- 6.35 In conclusion, there are trees which will be affected by the development proposals; however, the works are considered to be minimal and can be addressed by planning condition. Consequently, the proposals are considered to be consistent with the requirements of the NPPF and Local Plan policy EN14.

Amenity

- 6.36 An acoustic report has been commissioned to address the potential for noise impacts associated with the phase 2 works.
- 6.37 The report concludes (paragraphs 6.1-6.4) that

“...glazing of a performance above that of standard thermal double glazing will be required for the windows serving the Greyfriars Centre’s ground floor hall, with standard thermal double glazing being suitable for all other spaces. Mechanical ventilation will be provided so that these enhanced windows can remain closed during potentially noisy activities; but these windows need not be sealed and could be opened at other times when not used for such events.

The results of the assessment indicate that it will be possible to limit noise breakout from the loudest expected activity within the new development to below the technical criteria set in accordance with the relevant IoA and MCC guidance.”

- 6.38 It concludes that the requirements of local and national planning policy for noise will be met for the proposed phase 2 development.

Community Support / Benefits

- 6.39 The proposals are supported by a significant section of the local community and will deliver a modern facility fit for the future.

6.40 An extensive consultation process was carried out with the congregation with 85% of those responding agreeing with the plans to redevelop the site. The consultation process highlighted: -

- Much improved toilet facilities and in particular disabled facilities including improved accessibility to these facilities
- Improved visibility and access to the Church site
- Improved location and focus on the Bookshop and Coffee Shop

6.41 There is clearly a significant level of support which, whilst not material to the determination of the proposal, is indicative of the desire on the part of the Church community and others to see these improvements carried out. This is consistent with the approach adopted in the NPPF and the policies of the development plan – in particular Local Plan policy CC9.

Other Planning Matters

6.42 The applicants are content that the proposals will not generate material increases in visitor numbers to the extent that it would warrant an air quality assessment or flood risk assessment being carried out.

6.43 The site lies in flood zone 1 and the flood maps from the Environment Agency indicate that the site is not at risk of flooding. As a consequence, the proposals are considered to be in accordance with national and local planning policy in this regard.

7 CONCLUSIONS

7.1 The National Planning Policy Framework is broadly supportive of the provision of facilities such as that proposed, and in particular the proposals accord with the provisions that deal with highway matters, design, addressing the needs of the community and the delivery of sustainable development.

7.2 The policies of the development plan support proposals that do not harm the significance of heritage assets, that promote good design, and proposals that improve facilities such as the application site in this location, subject to meeting clearly defined criteria.

- 7.3 Greyfriars Church is a Grade I Listed Building. Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 both require that *‘.....the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’*
- 7.4 A detailed Heritage Impact Statement has been carried out which clearly sets out the significance of the heritage asset. The impacts identified in the heritage impact statement can all be mapped across to either ‘no harm’ or ‘less than substantial harm’ in NPPF terms.
- 7.5 The proposals have been designed to improve the setting of the church and in particular the west window. This is important because it will help to better reveal the significance of the church, sustaining and enhancing its significance in a way that is consistent with the requirements of the NPPF (para. 192).
- 7.6 The removal of the 1980s Church Centre building and its replacement with a more modern, elegant building with clean elevations faced in stone must be weighed in the balance. The scheme as a whole will be the next step in bringing about the re-ordering of the facilities that are associated with the Church, joining them to the Church more logically and allowing all visitors to enjoy the facilities that will be available with equal ease.
- 7.7 Consequently, in carrying out the heritage planning balance, the public benefits of the proposals are considered to significantly outweigh any harm arising from the development. The proposals are therefore considered to be compliant with the requirements of the NPPF and the policies of the adopted Local Plan.
- 7.8 According to Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 7.9 The proposals have been assessed against planning policy as set out in the Development Plan. Furthermore, the proposals have been prepared having regard to the principles contained in the NPPF and relevant supplementary planning documents.
- 7.10 It is concluded that the works are acceptable in terms of scale, mass and height with an innovative design. The design approach is considered appropriate to the character of

the wider area. In these regards the application is considered to comply with Adopted Development Plan policy and the NPPF.

7.11 It is also concluded that the proposals will have a number of positive benefits and, subject to the imposition of appropriate planning conditions, any required mitigation measures can be adequately secured.

7.12 Consequently, the planning balance is considered to weigh in favour of granting permission for the proposed development and therefore application is commended to the Council for approval.