

**Greyfriars Church, Friar Street, Reading, RG1 1EH
2 and 4 Sackville Street, Reading, RG1 1NT**

**Planning Statement
Phase 1 of Development Proposals**

On Behalf of Greyfriars Church

April 2019

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Project:	Greyfriars Church, Friar Street, Reading, RG1 1EH 2 and 4 Sackville Street, Reading, RG1 1NT Phase 1 of Development Proposals		
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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 scope of work has been considerably reduced and the phasing 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 negative response, the Church has a pressing need to develop on the Greyfriars site. There are a number of specific factors which are fueling this need to proceed:

- The church has outgrown the capacity of the existing buildings
- The current access to the church is confused and unwelcoming
- The context of the existing facilities is no longer in keeping with the mission and work of the church and the changing environment in which it finds itself.
- Accommodation for the staff team is inadequate and inefficient.
- Inadequate, poorly accessed toilet provision for the numbers attending regularly with no disabled toilet available

1.4 The proposals that are the subject of this application are referred to as phase 1. Having considered the nature of the comments at the pre-application stages, and the Church's immediate needs, they are now only proposing to seek permission for what was previously the less contentious first phase of the larger originally-proposed development.

1.5 Staff are having to work out of a sports hall viewing balcony and 18 yr old portacabins which themselves are a blight on the grade I listed building. Once implemented this

scheme will enable the Church to remove the portacabins and restore the area upon which the cabins sit.

- 1.6 Later phase(s) – should they occur - may involve the redevelopment of the Church centre and will be referred to as such where appropriate in this Statement. For the avoidance of doubt any later phase(s) will be the subject of subsequent applications. However the various consultant reports that have been commissioned to support this application rightly 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.
- 1.7 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 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 is under construction at the time of writing.
- 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 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, 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 The current proposals are to redevelop the site in two main phases. This application is concerned solely with phase 1 which is depicted in purple in the diagram below.



Diagram 1 – Application Phasing Plan

3.2 Page 9 of the submitted Statement of Need (March 2019) describes the works that will take place in both phases 1 and 2.

3.3 Phase 1 will comprise:

- Refurbishment of the two newly-acquired houses in Sackville Street and connecting them to the rest of the site by means of a new corridor that will also contain much improved toilet facilities and a new garden space
- Replacing the existing West End lounge and lobbies with a transparent single-storey structure incorporating a new main entrance, atrium, and café. This will flow through to the corridor leading to the Sackville Street houses

- We will look to utilise energy efficient technology and processes making the new facilities environmentally friendly

3.4 Phase 2 is not part of this planning application. However, if built it may comprise:

- Refurbish, or re-build on approximately the footprint of the present Greyfriars Centre, with the new building making use of the space envelope allowed by 'right to light' and daylight penetration considerations. The building will provide offices, meeting rooms and a main kitchen.
- Re-align the vehicle entrance and provide a more gently-graded car-park area with improved landscaping.
- Again we will look to utilise energy efficient technology and processes making the new facilities environmentally friendly

3.5 In terms of the needs identified above, the Statement of Need confirms that:

- *The proposed new main atrium at the west end of the church will present an open face to Friar Street, with entrances on its south and west sides. The atrium itself will incorporate a café counter and seating as well as a Reception desk. New doors will lead from the atrium into the church under the large west window. The new book sales area and reception will be visible and readily accessible.*
- *The main atrium will provide hugely improved fellowship space for Sunday services, with the café counter providing refreshments.*
- *We envisage that the upper floor offices of the Sackville Street houses will be made available to charities with whom we already have links. These offices will have their own separate entrance from Sackville Street and a ground-floor reception area.*
- *The integration of the site, with a staffed entrance close to Friar Street, will allow us to keep the church open much more of the time. The much improved toilets adjacent to the church, will also improve safeguarding and security while also increasing the practicality of the site for weekday/Saturday conferences and events.*

- *We will provide a prayer room on the ground floor of the Sackville Street houses, accessed through the side corridor,*
- *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.*

- 3.6 The Statement of Need goes on to explain why the proposals are required now, and how the community of the Church has been consulted on the proposals.

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.



- 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 including the conflicting 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 the Phase 1 application today.

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 2019, defines the development plan. For the purposes of this application the relevant policies are contained in the statutory development plan, which comprises the Core Strategy (January 2008) With Alteration adopted 27th January 2015, the Sites and Detailed Policies Document adopted 23rd October 2012 and altered January 2015 and the Reading Central Area Action Plan (adopted 2009).
- 5.3 The Submission Reading Borough Local Plan (March 2018) is still at examination and does not currently form part of the development plan as a consequence.

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 Core Strategy (January 2008) With Alteration (January 2015)

5.27 The Core Strategy is an integral part of the development plan and it contains various policies that are relevant to this application:

- CS1 Sustainable Construction and Design
- CS2 Waste Minimisation
- CS3 Social Inclusion and Diversity
- CS4 Accessibility and Intensity of Development
- CS5 Inclusive Access
- CS7 Design and the Public Realm
- CS22 Transport Assessments
- CS23 Sustainable Travel and Travel Plans
- CS24 Car / Cycle parking
- CS25 Scale and Location of Retail, Leisure and Culture Development
- CS31 Additional and Existing Community Facilities
- CS33 Protection and Enhancement of the Historic Environment
- CS36 Biodiversity and Geology
- CS38 Trees, Hedges and Woodland

5.28 Policy CS1 requires all new commercial developments to meet BREEAM 'Very Good'. Whilst this is not a commercial development the BREEAM Pre-Assessment submitted with the application indicates that the proposals will achieve this objective.

5.29 Consistent with the requirements of policy CS2, the development will make provision for waste storage and where possible construction waste will be reused and/or recycled.

5.30 The proposals are wholly consistent with the social inclusion objectives of policy CS3. Indeed, the Statement of Need submitted with the application explains this in further detail on page 8:

"We believe strongly that we should be outward looking as a church, not inwardly focussed. With a site in the centre of Reading we have the opportunity to give practical support, in the form of office space, to Christian charities working with those in need. We also believe, on the basis of

experience elsewhere, that we can build bridges with the business community by providing 'co-working' space which will allow home workers to come and use our premises as a base."

- 5.31 Policies CS4 and CS5 deal with accessibility. The proposals are not only accessibly located, situated as they are at the western end of the central commercial area of Reading, but they have also been developed to be truly accessible for Churchgoers and users of the facilities during the week.
- 5.32 As the Design & Access statement demonstrates, the proposal has been developed over a significant period of time. The replacement of the foyer at the western end of the Church and the introduction of modern and innovatively designed connecting lightweight structures between the Church foyer and Sackville Street properties, and between the foyer and the future Church centre building, are all elements of the scheme which will impact, to a greater or lesser degree, on the public realm.
- 5.33 Through ongoing engagement with Historic England and the Local Planning Authority's (LPA's) heritage advisors it has been possible to develop a scheme that is visually attractive, safe, accessible and which responds positively to the local context to create and reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough. The proposals are therefore consistent with policy CS7.
- 5.34 Policies CS22 to CS24 encourage the provision of transport assessments, sustainable travel and parking provision where needed. The proposals are in accordance with these requirements.
- 5.35 Policy CS25 requires that cultural facilities are provided within or as an extension to the centre of Reading. The proposals also comply with this requirement and are provided on a pre-existing site.
- 5.36 Policy CS31 supports the improvement of existing community facilities where there is a choice of means of travel (including walking and cycling), and in existing centres where possible. These requirements are fully addressed in the case of this application.
- 5.37 Policy CS33 seeks to protect the historic environment. It is perhaps the key policy in relation to this application albeit it is not consistent with the NPPF as written today. It states:

“Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- Listed Buildings;*
- Conservation Areas;*
- Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located.”

5.38 The application proposal has been demonstrated, through the submitted Heritage Impact Statement and Statement of Significance, that the residual risk and impact after mitigation has been taken into account is low to moderate.

5.39 Archaeologically, the submitted assessment concludes that a *“...scheme of further archaeological work will likely be required as a condition of planning and would be likely to include/involve further investigation and excavation of archaeological deposits within the development. The scope of any further archaeological work will need to be agreed with Berkshire Archaeology.”*

5.40 Policies CS36 and CS38 deal with biodiversity and trees respectively. The submitted biodiversity assessment confirms that the 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.”*

5.41 The Arboricultural report that accompanies this application confirms (section 7) that the proposed upgrade at Greyfriars Church requires some tree removal: only two trees are significant: T16 birch and lime T17. Of these, the birch T16 has limited safe life. Retained trees can be protected by careful construction methods, and development can be landscaped by new planting incorporating trees as indicated on the architect's plans.

5.42 In each case the proposed development is considered to be policy compliant.

Reading Central Area Action Plan (adopted 2009)

5.43 The policies that are relevant to this application are as follows:

- RC5 Design in the Centre
- RC7 Leisure, Culture and Tourism in the Centre
- RC12 Terraced Housing in the Centre

5.44 The site is not allocated for any particular use other than the Sackville Street properties which are protected under policy RC12d. It is sandwiched between the Station / River and West Side Major Opportunity Areas (policies RC1 and RC2).

5.45 As with policy CS7, the proposals have been designed to respect the high-quality detailing and materials found locally. The development proposals are a good example of buildings adapting over time to meet changing circumstances and thus the proposals are considered to accord with the requirements of policy RC5.

5.46 Consistent with the policy requirement that cultural facilities will be focussed primarily in the centre of Reading, the proposals accord with policy RC7.

5.47 Whilst the rear of Nos 2 and 4 Sackville Street will be altered, overall the character of the terraced properties will remain unharmed and the character of the street will continue to be respected as a result of the proposed development, consistent with the requirements of policy RC12 (d).

Sites and Detailed Policies Document (adopted Oct 2012 and altered Jan 2015)

5.48 The policies that are relevant to this application are as follows:

- DM4 Safeguarding Amenity
- DM12 Access, Traffic and Highway Related Matters
- DM18 Tree Planting

5.49 Policy DM4 requires that development does not cause harm (a significant detrimental impact) to existing or new dwellings as a result of various factors including privacy, overlooking, noise, disturbance and visual dominance and overbearing effects of development. The proposals have been developed to respect the adjacent residential properties in Sackville Street and are not considered to result in any harm as a consequence.

5.50 The access arrangements will remain largely unaltered as a result of this development. Since the level use of the premises is likely to remain largely unchanged and the parking will be rationalised, there is no reason to indicate that the proposed development will be in conflict with policy DM12.

5.51 Where feasible new planting will be introduced to the site, consistent with the requirements of policy DM18. This matter can be conditioned if appropriate.

Supplementary Planning Documents

5.52 Regard has been had to the Sustainable Design and Construction SPD and the Employment Skills and Training SPD.

5.53 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 Sustainability Statement. The proposals are considered to comply with the Sustainable Design and Construction SPD as a result.

5.54 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.

5.55 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

Emerging Reading Borough Local Plan (Submission March 2018)

5.56 The weight to be attached to the policies in this draft document is not yet great at the time of writing. However, should it gain weight during the progress of the application then the following policies are considered to be relevant and the scheme may need to be assessed against them in further detail.

- 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
- EN8 Undesignated Open Space
- EN12 Biodiversity and the Green Network
- EN14 Trees Hedges and Woodland
- TR3 Access, Traffic and Highway Related Matters
- TR5 Car and Cycle Parking
- 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

5.57 These policies echo and will largely replace the existing Core Strategy and RCAAP policies once the new Local Plan is adopted.

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 It is therefore understood that the works to the Church would be dealt with under the ecclesiastical exemption and via the 'Faculty' process.
- 6.3 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, and that where harm that does arise is outweighed by the benefits (including public benefits) associated with the proposed development.
- 6.4 In this context, the NPPF (189-200), Core Strategy policy CS33 and draft 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.
- 6.5 Policy CS33 notes that planning permission will only be granted where development has no adverse impact on historic assets and their settings. It goes on to explain that all proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located.
- 6.6 Draft policy EN1 takes this further, explaining 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.
- 6.7 Draft policy EN2 extends the above-mentioned requirements to include an assessment of sites of archaeological significance as well. Draft 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.
- 6.8 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 draft policy EN2 issues. Various technical reports have already been prepared to address the specific issues that these policies identify, including an archaeological desk-based assessment, a statement of significance and a statement of need – all are submitted in support of this application.

- 6.9 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, including the west end extension, are of poor quality and no significance; they make poor use of the site and the latter in particular actively detracts from the west end of the friary Church with its huge and nationally important medieval west window.
- 6.10 2-4 Sackville Street are described in the Statement of Significance (s.6.6) thus: The facade is an important element of the streetscape but the rear extension and interior refurbishments have removed most of the original character of the building itself. Low significance as a whole, the facade moderate significance as a part of the streetscape.
- 6.11 The Memorial Hall on Sackville Street is described (s.6.5) as being of moderate significance. The Greyfriars Centre itself is described as having no significance.
- 6.12 In the context of the above the proposals focus primarily on removing modern structures and extensions which are of low or no significance and replacing them with modern structures which arguable enhance the setting of the Church and thus will deliver a positive benefit to the significance of the Church, especially given the connection of the foyer to the western wall which contains the highly significant west end window.
- 6.13 The impact of the works on the fabric of the listed Church and particularly the west end wall is undoubtedly at a scale and in a form that could be perceived as harm. (whether that be less than substantial or substantial). However, against that must be balanced the public benefit of better revealing the interior of the Church to present a more welcoming, open building, as opposed to the current rather impenetrable and fortress-like building. The new building will be of the same height as the existing, and will replace the unsatisfactorily solid looking modern west end extension, which does not contribute to the significance of the Church.
- 6.14 The proposals have been designed to improve visibility of the west window which is covered in part by the 1970s west end meeting room. This is important because it will help to better reveal the significance of the window, sustaining and enhancing its significance in a way that is consistent with the requirements of the NPPF (para. 192).
- 6.15 The removal of the 1970s west end meeting room and its replacement with a more modern, lightweight structure that encourages people to enter the building and which

provides badly needed modern facilities for today's congregation, is a significant public benefit which must be weighed in the balance. The scheme as a whole will bring about a re-ordering of the facilities that are associated with the Church, adjoining them to the Church more logically and allowing all visitors to enjoy the facilities that will be available with equal ease.

6.16 The heritage impact statement concludes (pages 22-24) that the impacts that arise as a result of the proposed works are all in the 'none' / 'low' / 'moderate' range and all can be appropriately mitigated. 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, the Core Strategy, and the policies of the emerging Local Plan.

6.17 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.

6.18 Over the last few months various changes have been made to the scheme in response to his comments, as follows:

- Amendments to the area to the north of the west end
- Simplification of the glass front of the west end
- Increased the height of the portico entrances
- Flank wall has been refined to more clearly separate the west end from the other aspects of the proposals
- Reduced openings through the west end wall to two doors with narrow side lights
- Alterations to the narthex (also described as atrium and foyer) design
- Alterations to the modern extension on north side of Church

6.19 His most recent response (dated 18th March 2019) advises

"Thank you for your email of the 14th of March and the attached visuals which show, in sketch form, the current proposals for the new narthex and link with the houses in Sackville Street.

The design for the narthex has evolved since we last met and I am now content that all the issues I have raised previously about its external appearance have been addressed. There is no question that the extension would dramatically change the appearance of the Church but the present narthex neither meets the needs of the congregation nor

enhances the appearance of the Church. The proposals would present a much more welcoming approach to the building and in my view would not be more harmful to the architectural qualities of the exterior, and thus its significance, than the current building. Careful detailing of the glazing and the edge of the roof will be needed to ensure that this building looks elegant, along with the highest quality of materials.

We are content with the proposed alterations to the modern extension to the north of the Church. These would greatly enhance the usability of this area without harming the significance of the building. The details provided showing the joint between old and new using an existing flashing are satisfactory.

The proposed new west doorway would harm the significance of this grade I listed building as it involves breaking through a medieval wall. However, we accept the practical arguments for a central doorway, that it needs to be of the size proposed and that its form has been refined to minimise its architectural impact. I did prefer earlier iterations, which showed a plain plaster surround on the interior. A wide door here would read as a very modern intervention and therefore I think it best to keep it as simple as possible. Stone dressings are needed on the external side (facing the atrium) as flint needs quoining to support it but again these should be as simple as possible.

Next Steps

In our view the proposals for the Atrium and the refurbishment of the Sackville Street Houses are ready to be submitted as a planning application. I wish you well with this process.” (Bluestone Emphasis)

- 6.20 Therefore, the application is submitted with the endorsement of Historic England having been designed in consultation with them over many months. Most of the internal works will be dealt with through the faculty process managed by the Diocese for dealing with development affecting working Churches. There will inevitably be some crossover between the faculty considerations and that of the LPA’s conservation advisers / Historic England.

Archaeology

- 6.21 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."

6.22 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.

6.23 Since the last pre-application submission, a desk-based assessment of the development proposals has been commissioned. It has concluded that

"10.1.2 Due to the potential for below ground archaeological remains to survive within the site it is anticipated that a program of archaeological works likely to include/involve further investigation and excavation of archaeological deposits within the development footprint will be required to preserve by record any remains that may be destroyed by groundworks. This can be secured as a condition of planning and is accordance with NPPF paragraph 141.....

11.1.2 The site is currently occupied by the Greyfriars Centre, portacabins, tarmacadam car park and the western end of the Church which is a 1970s extension. 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.

11.1.3 A scheme of further archaeological work will likely be required as a condition of planning and would be likely to include/involve further investigation and excavation of archaeological deposits within the development. The scope of any further archaeological work will need to be agreed with Berkshire Archaeology."

6.24 Therefore, taken together (the 2012 and 2018 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. There is no need to undertake any further pre-application investigations as far as the applicant is aware.

Need

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

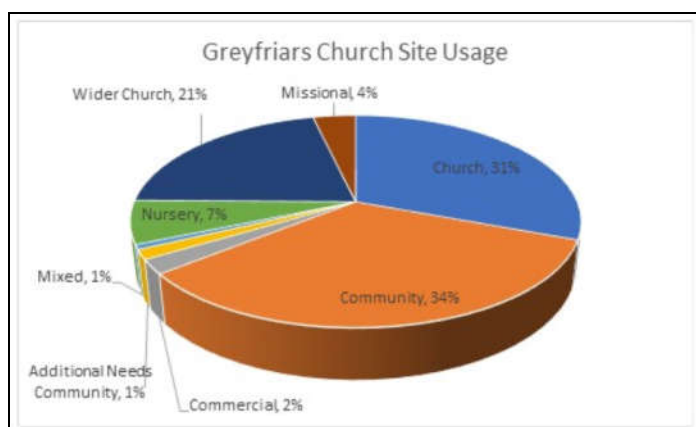
The buildings surrounding the church, which date from the early years of the 20th century, the 1970s and the 1980s, were visionary responses to the ministry needs of their time. However, although between them they provide a considerable amount of space we have largely outgrown our facilities. The site 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.

6.26 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

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



6.28 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.

6.29 Core Strategy policies CS3, CS9 and CS31 support the provision of 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.

Sackville Street Properties – Planning Status

6.30 The planning status of Nos 2 and 4 Sackville Street is confirmed in a permission dated 16/01/1978 which related to a change of use of the properties from residential to a counselling and outreach service (use class D1) which is the same use class as the Church and does not therefore require a change of use.

Biodiversity

6.31 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.”

- 6.32 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.”

- 6.33 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.
- 6.34 In light of the above it is likely that the scheme will be compliant with the requirements of NPPF paragraph 175, Core Strategy policy CS36, and draft Local Plan policy EN12.

Transport / Traffic / Parking

- 6.35 The Helix Transport Consultants report dated November 2017 summarises the assessment work undertaken to examine the highways, traffic generation and parking requirements.
- 6.36 It sets out findings on traffic generation at section 5.3, but they can be ignored for the purposes of this application since they relate to the construction of the new Church centre building and three flats within the development which are not a part of this application for phase 1. Furthermore, it advises that the proposed redevelopment is not expected to have any significant effect on a Sunday, the site's busiest period.
- 6.37 The report concludes (4.2) that there are no proposed alterations to the access off Sackville Street.
- 6.38 The current phase 1 works will not include the new Church centre building or the flats. It is unlikely that the phase 1 development will generate a significantly increased footprint (607 sq.m. for phase 1 excluding the Church itself; 585 sq.m. for the Church

itself), and therefore the impact on parking and traffic generation is unlikely to be an issue.

- 6.39 As a consequence, Core Strategy policies CS20, CS22, CS23 and CS24 are considered to be complied with, as are draft Local Plan policies TR3 and TR5 and NPPF paragraph 109.

Landscaping / Trees

- 6.40 The submitted BS5837 Tree Survey by BJ Unwin Forestry Consultancy (2011 revised December 2018) 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 13-14. The report recommends lifting the crown of Holly tree T15 and removal of T16 (Silver Birch), T17 (Lime), T18 (Silver Birch) and T22 (London Plane). However the current scheme only requires the removal of T16 and T17 and a Buddleia and Pittosporum adjacent to the north side of the Church.
- 6.41 The report confirms that only two trees are significant, and of these, the Silver Birch T16 has a limited safe life. The report confirms that retained trees can be protected by careful construction methods and that the development can be landscaped by new soft landscaping incorporating a few trees.
- 6.42 In conclusion, there are trees which will be affected by the development proposals; however, the benefits of their removal will significantly outweigh any harm to the site or surrounds in the long run as a result of additional planting etc. This must be weighed in the overall planning balance. Consequently, the proposals are considered to be consistent with the requirements of the NPPF, Core Strategy policy CS38 and draft Local Plan policy EN14.

Amenity

- 6.43 An acoustic report has been commissioned to address the potential for noise impacts associated with the phase 1 works.
- 6.44 The report concludes (paragraphs 6.2-6.5) that there are no new significant noise generating activities likely to arise, and the new lobby would still provide the same degree of buffer to potential noise breakout from the existing church.
- 6.45 It goes on to note that there may be new mechanical plant installed to serve the new toilet facilities and, based on the existing noise survey, external plant noise emission limits have been set.

6.46 It concludes that the requirements of local and national planning policy for noise will be met for the proposed phase 1 development.

Community Support / Benefits

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

6.48 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

6.49 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 (adopted and emerging) of the development plan – in particular policy CS3 of the Core Strategy and draft Local Plan policy CC9.

Energy

6.50 The Sustainability Statement submitted in support of this application makes a number of relevant points at Section 6 (conclusions):

- this report aims to provide preliminary guidance to the design team throughout the early RIBA stages with regards to
- the BREEAM assessment methodology and process and as a part of this has identified the following:
 - An overview of the BREEAM process
 - The mandatory credits that are required to achieve a 'Very Good' BREEAM rating
 - Early stage actions to be considered
- The requirements for specialist consultants

6.51 It goes on to state:

"It should be noted that there are specific consultants and technical services required at different RIBA stages. The appointment of any of

these services should be considered as early as possible to enable the project to achieve the required ratings as well as full design team engagement.

This report and the associated appendices demonstrate that all of the 31no. items identified in Table A5.2: BREEAM - Sustainable Design Checklist in Appendix 5 of Reading Borough Council's adopted Revised Sustainable Design and Construction SPD have been considered by the design team and incorporated into the proposals where possible

The pre-assessment provides an overview of the proposed route to BREEAM 'Very Good', the next step would be for the formal design stage assessment process to commence.

It is recommended that the design team and client review the pre-assessment in detail and advise the assessor as soon as possible if there are any issues that are likely to become unachievable as the project develops, similarly if there are items that are not currently targeted that would be beneficial to the scheme or assist with the clients aspirations towards BREEAM 'Very Good' it would be useful to target them now to ensure sufficient evidence is available at the appropriate time, particularly with respect to the time bound criteria."

- 6.52 Where relevant, these matters can be condition if appropriate. In all other respects the proposals are considered to comply with policies CS1, draft Local Plan policy CC2 and the provisions in the Sustainable Design and Construction SPD.

Other Planning Matters

- 6.53 The applicants are content that the proposals will not generate material increases in either built footprint or visitor numbers to the extent that it would warrant an air quality assessment or flood risk assessment being carried out. As residential accommodation is no longer proposed, the need for an air quality assessment (May 2018 pre-application response page 7) is no longer justified.
- 6.54 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.
- 6.55 It is also relevant to consider recent cases affecting several Churches including Bath Abbey and St Philip and St James in Cheltenham where the desire to allow the Church to continue to serve its community, adapting where necessary to changing usage patterns and needs, was initially rejected in favour of 'architectural purism'. In both of the above cases the proposals were eventually allowed to proceed but it has provoked a wider debate about the risk of preserving buildings for their architectural merit in preference to their ongoing use for purposes of worship and community use. (see for

example https://www.telegraph.co.uk/news/2018/08/20/middle-classes-have-become-obsessed-stained-glass-Church-pews/?WT.mc_id=tmq_share_em).

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 and the emerging Local 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 define 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. Recent discussions with Historic England have led to the comment that *“In our view the proposals for the Atrium and the refurbishment of the Sackville Street Houses are ready to be submitted as a planning application”*.
- 7.5 The heritage impact statement concludes (pages 22-24) that the impacts that arise as a result of the proposed works are all in the ‘none’ / ‘low’ / ‘moderate’ range and all can be appropriately mitigated. 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.
- 7.6 The proposals have been designed to improve visibility of the west window which is covered in part by the 1970s west end meeting room. This is important because it will help to better reveal the significance of the window, sustaining and enhancing its significance in a way that is consistent with the requirements of the NPPF (para. 192).

- 7.7 The removal of the 1970s west end meeting room and its replacement with a more modern, lightweight structure that encourages people to enter the building, that provides a corridor to the associated Church offices fronting onto Sackville Street, and which provides badly needed modern facilities for today's congregation, is a significant public benefit which must be weighed in the balance. The scheme as a whole will bring about a 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 (see for example the photograph of the poor quality corridor to the toilets at the moment on page 12 of the Statement of Need that accompanies this application).
- 7.8 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, the Core Strategy, and the policies of the emerging Local Plan.
- 7.9 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.
- 7.10 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.
- 7.11 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.
- 7.12 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.
- 7.13 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.