



# **PLANNING STATEMENT**

**Including Draft S.106 Heads of Terms**

Broad Street Mall, Reading, RG1 7GQ

November 2018

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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Ltd to accompany an application for full planning permission. The application is submitted on behalf of Inception (Reading) Sarl (c/o Moorgarth Group Limited) (hereafter referred to as the ‘Applicant’) for a proposed mixed use development located at Broad Street Mall, Reading (hereafter referred to as ‘the Proposed Development’).

### **The Planning Application**

- 1.2 Detailed planning permission is sought for the construction of three residential buildings above Broad Street Mall, construction of a residential tower at South Court with flexible retail (Use Class A1/A2/A3) at ground and first floor, change of use and extension of Quadrant House from office (Use Class B1a) to residential (Use Class C3), and the creation of three ground floor flexible retail units (Use Class A1/A2/A3) to improve existing retail offer along Dusseldorf Way and Queens Walk. The Application Site extends to 1.86 ha and is located within the administrative area of Reading Borough Council (“RBC” or “the Council”).

- 1.3 The description of development is as follows:

*“Construction of three residential buildings (Use Class C3) ranging in height from 5 to 22 storeys above Broad Street Mall and provision of a podium level amenity area; Construction of an 18 storey building on South Court comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors (Use Class C3); Change of use and extension of Quadrant House to form a 3 storey residential building (Use Class C3); Creation of three ground floor retail units (Use Class A1/A2/A3) fronting Dusseldorf Way and Queens Walk; All necessary enabling and alteration works required within the existing Broad Street Mall basement, ground and upper floors; Associated car park alterations, provision of servicing and refuse storage, cycle parking, public realm, landscape, and other works incidental to the phased development.”*

- 1.4 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including planning and highways officers at RBC, ward councillors, local residents and other property owners and business and stakeholders.
- 1.5 This Statement assesses the planning considerations associated with the Proposed Development and considers the development in the context of relevant planning policy and guidance.

### **Planning Application Documents**

- 1.6 The following documents are submitted as part of the planning application:
- Completed Planning Application Form and Ownership Certificate

- Drawings – Location Plan, Site Plan/Block Plan, Existing & Proposed Plans, Sections & Elevations; and
- Design and Access Statement.

1.7 The following documents are submitted to accompany the planning application:

- Planning Statement (including Draft S106 Heads of Terms);
- Community Infrastructure Levy (CIL) Form;
- Transport Statement, Travel Plan and Servicing & Waste Management Plan;
- Sustainability Statement;
- Energy Strategy incl. BREEAM Pre-Assessment;
- Landscape Strategy (inc. Lighting Assessment) & Proposed Drawings;
- Internal Daylight Assessment;
- Ventilation and Extraction Statement;
- Utilities Statement;
- Foul Water Statement;
- Draft Demolition/Construction Environmental Management Plan;
- Statement of Community Involvement;
- Affordable Housing Statement;
- Financial Viability Statement;
- Fire Strategy;
- Flood Risk Assessment & Drainage Strategy;
- Environmental Statement prepared by Trium and others including:
  - Volume 1: Non-technical Summary;
  - Volume 2: Environmental Statement:
    - Chapter 1: Introduction;
    - Chapter 2: EIA Methodology;
    - Chapter 3: Alternatives & Design Evolution;
    - Chapter 4: Proposed Development;
    - Chapter 5: Demolition and Construction;
    - Chapter 6: Socio-Economics;
    - Chapter 7: Air Quality;
    - Chapter 8: Noise and Vibration;
    - Chapter 9: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
    - Chapter 10: Wind Microclimate;
    - Chapter 11: Effect Interaction;
    - Chapter 12: Likely Significant Effects and Conclusions;
    - Chapter 13: Mitigation and Monitoring; and
    - Chapter 14: Glossary and Abbreviations.
  - Volume 3: Townscape, Built Heritage and Visual Impact Assessment;
  - Volume 4: Technical Appendices;

- Preliminary Ecological Phase 1 Assessment;
- Archaeological Assessment;
- Geo Environmental Assessment;
- Green House Gas Emissions Assessment; and
- Health Impact Assessment.

### **Structure of this Statement**

- 1.8 This document provides an overview of the Application Site and the Proposed Development and sets out a justification for the development. The Planning Statement takes the following form:
- Section 2 describes the Site, the main features of the surrounding area and the Site’s planning history.
  - Section 3 describes the main components and features of the proposed development.
  - Section 4 outlines the relevant planning policy context of the Site and the proposed development.
  - Section 5 sets out a planning assessment of the proposed development against policy requirements.
  - Section 6 provides a summary of the draft planning obligations.
  - Section 7 provides a summary and our conclusions on the proposed development.
- 1.9 Overall, the Site represents a significant opportunity to deliver development that optimises the potential of the Site, making a substantial contribution to the provision of new homes, as well as providing high-quality flexible retail floorspace.

## **2.0 THE SITE AND SURROUNDING AREA**

- 2.1 The 1.86ha Site comprises the existing Broad Street Mall, situated in the centre of Reading. The Site is bound to the north by Oxford Road, to the east by St Mary's Butts, to the south by Hosier Street which extends into Dusseldorf Way, and to the west by Queen's Walk.
- 2.2 Broad Street Mall is an established retail, leisure, food and beverage destination in the town and was originally constructed in the late 1960s which opened in 1971. The shopping centre spans the entire site area and is arranged over basement, ground and one upper floor. The basement level extends underneath the site and includes numerous plant rooms, the main waste storage area and storage facilities associated with the retail units above. The basement, and the public car park which sits above the Mall, is accessed from a vehicular route from Castle Street (south) or Caversham Road (A329) to the west. Above the Mall is office space within Fountain House (northwest corner) and Quadrant House (southeast corner).
- 2.3 A multi-storey car park is also located on the site. This comprises 700 car-parking spaces spread across three floors, part first, second and the upper podium level. The car park is publicly accessible and operates 24-hours a day, seven days a week.
- 2.4 The surrounding area is typified by a mix of retail, commercial, and leisure uses, including offices, shops, restaurants, pubs, the Hexagon Theatre and Church of St Mary.
- 2.5 In terms of relevant planning designations, the Site is located within Central Reading, the West Side Major Opportunity Area and Western Grouping Tall Building Area, Central Core, Office Core and the Primary Shopping Area. The Site is also located within the emerging Hosier Street Framework Area which envisages comprehensive regeneration across the Council's former Civic Offices site and adjacent landholdings, including Broad Street Mall. The Site is located in Flood Zone 1 (low risk).
- 2.6 The Site is not located within a Conservation Area, but is located adjacent to St. Mary's Butts/Castle Street and Russell Street/Castle Hill Conservation Areas. There are also a number of listed buildings and monuments located within close proximity to the Site, including the Church of St. Mary (Grade I listed) on the eastern side of St Mary's Butts; the Queen Victoria Jubilee Fountain (Grade II listed); the Allied Arms Inn (Grade II listed); 55 and 55A, St Mary's Butts (Grade II listed); and Jubilee Cross (Grade II listed).

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### Site Planning History

- 2.7 Since the construction of Broad Street Mall in the 1960s there have been a number of planning applications submitted to Reading Borough Council. Below is a list of the most relevant planning applications relating to the Site.
- 2.8 Planning permission was granted on 18 August 1999 for the demolition of 3 existing two-storey rooftop maisonettes and single storey management offices on the roof and the creation of 81 roof top public car parking spaces including access ramp from existing car park (Ref: 991830).
- 2.9 On 08 June 2016 planning permission was granted for External alterations and installation of a new entrance foyer to Fountain House fronting Queens Walk, plus associated works (Ref: 160581).
- 2.10 Planning permission was granted on 17 January 2018 for the erection of a temporary two and part three-storey building (constructed using shipping containers) to create a mixed-use urban market comprising Retail (Use Class A1) and Restaurants/Cafés (Use Class A3), including use of external spaces at roof level; Refuse store, cycle parking and associated works (Ref: 171230).
- 2.11 Planning permission was refused on 26 June 2018 for the erection of a temporary three-storey building (constructed using shipping containers and timber frames/cladding) to create a mixed-use Urban Market comprising Shop, Restaurant/Cafe, Bar and Hot Food Takeaway Uses (Class A1/A3/A4 Use), including shared circulation and external seating spaces; refuse store, cycle parking and associated works (Ref: 180800).
- 2.12 On 02 August 2018 an application was approved for the amalgamation of Units 37a & 55-56 to form a single Retail Unit (Class A1) arranged over Ground and Basement Floors. Installation of Shop fronts to Oxford Road Elevation and Return Mall Elevation (Ref: 180851).
- 2.13 Planning permission was granted on the 13 September 2018 for the subdivision of a three-storey retail unit (Class A1) and change of use to form: 1x retail unit (Class A1) at part basement / part ground floor; 2x flexible retail or restaurant units (Class A1/A3) at ground floor level; and 2x assembly & leisure units (Class D2) - 1 at part basement / part ground floor & 1 at part ground, part first floor level, together with shared access and means of escape; associated replacement shopfront works and associated external alterations on Oxford Road and Queens Walk frontages (Ref: 180823).
- 2.14 Planning permission was granted on 02 November 2018 for external alterations comprising the installation of replacement shopfront and entrance at ground floor, and installation of two fixed windows and two bi-folding windows at first floor (Ref: 181613).

- 2.15 Other planning history for the Site relates to minor development such as advertisement consent, change of use applications within the Mall, and discharge of planning conditions.

### 3.0 THE PROPOSED DEVELOPMENT

- 3.1 This Section details what is being applied for in the planning application for the Proposed Development. This Section should be read in conjunction with the Design and Access Statement, which further describes the principal components of the Proposed Development, its design approach and relation with the context and townscape.

#### **Description of Development**

- 3.2 This application seeks full planning permission for:

*“Construction of three residential buildings (Use Class C3) ranging in height from 5 to 22 storeys above Broad Street Mall and provision of a podium level amenity area; Construction of an 18 storey building on South Court comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors (Use Class C3); Change of use and extension of Quadrant House to form a 3 storey residential building (Use Class C3); Creation of three ground floor retail units (Use Class A1/A2/A3) fronting Dusseldorf Way and Queens Walk; All necessary enabling and alteration works required within the existing Broad Street Mall basement, ground and upper floors; Associated car park alterations, provision of servicing and refuse storage, cycle parking, public realm, landscape, and other works incidental to the phased development.”*

#### **Pre-application Consultation**

- 3.3 The design team have engaged with Reading Borough Council officers and Members. The feedback received has specifically influenced the overarching design approach.
- 3.4 A public exhibition was held over three days on 29<sup>th</sup>, 30<sup>th</sup> November and 1<sup>st</sup> December 2018 at Broad Street Mall in Reading, where the public were able to preview and comment on the emerging scheme designs.

#### **Summary of Works**

- 3.5 The Proposed Development seeks to continue the regeneration and improvement efforts brought forward by the Applicant since the acquisition of the Mall in August 2015. The significant investment has included the refurbishments of Broad Street Mall and Fountain House and more recently consents to bring the former Argos corner into use to provide a local supermarket and cinema as well as the submission of a planning application for a 101 bedroom hotel at the site of the former Eva’s Nightclub (18-20 Hosier Street).
- 3.6 As detailed above, the proposed scheme will play an important role at both strategic and local levels. This proposal seeks to deliver 493 one, two and three bedroom residential dwelling units (Use Class C3), together with flexible retail

floorspace (Use Class A1/A2/A3) in the Central Reading area. The scheme makes best use of a previously developed site in a highly accessible location, and takes the opportunity to create active frontages along Dusseldorf Way and Queens Walk as advocated through the draft Hosier Street Area Outline Development Framework.

3.7 A summary of the proposed works is outlined below:

- Construction of three residential buildings ranging from 5 to 22 storeys above Broad Street Mall.
- Construction of an 18 storey residential building on South Court comprising ground and first floor flexible retail (Use Class A1/A2/A3).
- Change of use and extension of Quadrant House from office (Use Class B1a) to form a three storey residential building (Use Class C3).
- Creation of three ground floor retail units (Use Class A1/A2/A3) fronting Dusseldorf Way and Queens Walk.
- Amendments to car parking at first, second and upper podium levels in order to accommodate residential buildings and amenity space at podium level.
- Provision of 24 accessible car parking and 260 cycle parking spaces.

### **Massing and Materiality**

3.8 As set out in the supporting Design and Access Statement, the proposed scheme comprises new residential buildings ranging in height from 5 to 22 storeys above Broad Street Mall or +128.95 AOD, with basements and two storey podium level.

3.9 The proposed massing is cognisant of the adjacent Conservation Area, stepping down towards Reading Minster to the east.

### **Landscaping and Public Realm**

3.10 As set out in the supporting Landscape Design document, prepared by McGregor Smith Landscape Architects, the amenity area at second floor level will benefit from high-quality hard and soft landscaping and the addition of planters, trees, outdoor furniture and informal children's play space, creating an inviting space for residents.

### **Proposed Areas and Residential Mix**

3.11 A breakdown of proposed floorspace is provided in Table 3.1 below. An assessment of the proposed uses is set out in Section 6.0 of this Statement.

| Use                      | Area to be Lost by Change of Use GIA (sq m) | Proposed GIA (sq m) |
|--------------------------|---------------------------------------------|---------------------|
| <b>Residential (C3)</b>  | -                                           | 34,738              |
| <b>Retail (A1/A2/A3)</b> | 1,881                                       | 1,592               |
| <b>Office (B1a)</b>      | 1,702                                       | -                   |
| <b>TOTAL</b>             | <b>3,583</b>                                | <b>36,330</b>       |

Table 3.1 – Existing and proposed floorspace by land use

3.12 The proposed residential mix is set out below:

|                     | 1 bed | 2 bed | 3 bed | Total |
|---------------------|-------|-------|-------|-------|
| <b>No. of units</b> | 214   | 253   | 26    | 493   |
| <b>%</b>            | 43.4% | 51.3% | 5.3%  | 100%  |

Table 3.2 – Residential unit mix

### Transport

- 3.13 Vehicular access to the existing NCP car park is retained from Castle Street to the south and the A329 to the west. The Scheme will provide 24 accessible spaces on the second floor and servicing, refuse and delivery collection areas at basement level.
- 3.14 Overall, 60 car parking spaces will be lost within the existing car park to facilitate residential cores, the introduction of accessible spaces and realignment of vehicular routes.
- 3.15 A total of 260 secure cycle parking spaces for residents at basement level.
- 3.16 Vehicle movements at basement level will be managed through a Delivery and Service Plan (DSP). Servicing and refuse collection will be undertaken on-site at basement level where the communal bin stores are located within each of the blocks.

### Energy and Sustainability

- 3.17 The Proposed Development will aim to achieve a high level of environmental performance to minimise its carbon footprint. This will be achieved by designing the buildings to have high standards of insulation to minimise the energy uses and using on-site renewable energy generation and low carbon technologies.

## 4.0 PLANNING POLICY CONTEXT

- 4.1 The purpose of this Section is to identify the key national and local planning policy and guidance relevant to the determination of the planning application against which the proposals have been considered during design development. An analysis of the key policies and tests relating to the proposed development is included below.

### **National Planning Policy**

- 4.2 National planning policy is set out in the National Planning Policy Framework (NPPF), which was adopted on 24 July 2018. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 4.3 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

### **The Development Plan**

- 4.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.5 The Development Plan for the Site comprises the following:
- Reading Local Development Framework ‘Core Strategy’ (January 2008, altered January 2015)
  - Reading Local Development Framework ‘Sites and Detailed Policies Document’ (October 2012, altered January 2015); and
  - Reading Central Area Action Plan (January 2009).
- 4.6 The Reading Borough Council Submission Draft Local Plan is now at an advanced stage of preparation. It is anticipated that the Local Plan will be adopted in early 2019 as the Examination in Public is now complete. As a result, the document is a material consideration and due weight will be given to the Plan in decision-making, unless other material considerations indicate that it would not be reasonable to do so. The Plan will not gain full weight until it is adopted by the Council. Due consideration has been given to the emerging policies.

- 4.7 There are also a number of supplementary guidance documents published by Reading Borough Council which have been taken into account during the course of design development and the preparation of the planning application. Insofar as they may be considered relevant to this application is the Reading Tall Building Strategy (January 2008), Sustainable Design and Construction SPD (2011), Employment Skills and Training SPD (2013) and Planning Obligations under Section 106 SPD (2015).
- 4.8 In addition to the Development Plan and supplementary guidance documents, there are emerging planning documents which have also been taken into account. Of particular relevance to this application is the draft Hosier Street Area Outline Development Framework (November 2018) which is proposed to be approved by the Council on 12 December 2018.

### **Site Designations**

- 4.9 The Site is subject to the following designations, as defined by Reading Borough Council.
- Central Reading;
  - Major Development Areas in the Centre;
  - Settlement Boundary;
  - Development in the West Side Major Opportunity Area (Site RC2d/RC12d, Broad Street Mall);
  - Central Core, Office Core and Primary Shopping Area;
  - Tall Buildings (RC13b, Western Grouping);
  - Reading Central Area; and
  - Air Quality Management Area.
- 4.10 The draft Hosier Street Area Outline Development Framework (November 2018) identifies Hosier Street/Broad Street Mall as an area that provides significant development opportunity for a major mixed use development in Central Reading. The area will host a wide range of uses and activities that will contribute to an active, well designed public realm throughout daylight and evening hours. There will be a mix of residential/office/commercial/retail and leisure/community facilities.
- 4.11 The Draft Hosier Street Area Outline Development Framework further states that *“a development which retains the existing mall with additional development above may be appropriate where it improves the quality of the existing mall frontages.”*

## 5.0 PLANNING ASSESSMENT

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

- Loss of Office Use;
- Principle of Residential Use;
- Principle of Flexible Retail Use;
- Design;
- Residential Standards;
- Affordable Housing;
- Residential Density;
- Residential Amenity;
- Heritage and Archaeology;
- Transport and Accessibility and Servicing;
- Flood Risk and Drainage; and
- Energy and Sustainability.

### **Loss of Office Use**

5.2 Paragraph 121 of the National Planning Policy Framework (NPPF) states that local planning policy authorities should take a positive approach to applications for alternative uses of land which is currently development but not allocated for a specific purpose in plans, where this would help meet identified development needs. In particular, they should support proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or the vitality and viability of town centres.

5.3 Core Strategy Policy CS11 (Use of Employment Land for Alternative Uses) and draft Local Plan Policy EM3 (Loss of Employment Land) allow the change of use of existing employment land to other uses where certain criteria are met, including a range of transport methods to reach the site; the viability of the existing use and where there is a surplus in similar accommodation.

5.4 Reading Central Area Action Plan Policy RC2(d) and draft Local Plan Policy RC12(d) (Development in the West Side Opportunity Area – Broad Street Mall) note that development within the West Side Major Opportunity Area will contribute towards providing a mix of uses including residential.

- 5.5 The building does not fall within the Core Employment Area where the overall loss of employment land should be maintained. As contemplated by part (v) of policy EM3 the need for residential use outweighs the need to retain this relatively low quality office use. The building does not benefit from frontage on to St Mary's Butts at ground level and the office floorplate is inflexible and not suitable for a range of businesses. This piecemeal loss of office use would allow for the comprehensive development of Quadrant House and its extension for residential use, consistent with Policy EM3 part (vi). Additionally, since acquisition of Broad Street Mall and Fountain House in 2015, the Applicant has invested significantly in the refurbishment of Fountain House to improve the quality of internal spaces and provide a more attractive space meeting the needs of modern businesses.
- 5.6 The replacement of the existing, dated office floorspace on an unallocated employment site would facilitate the delivery of 31 residential units which when taken into account with the wider Broad Street Mall Masterplan will deliver 493 residential units in an area of high housing demand, which would not undermine key economic sectors or sites, or the vitality or viability of Central Reading. As such, it is considered that the loss of the existing B1a office floorspace is in accordance with the NPPF, adopted Policies CS11 and RC2(d) and emerging Policies EM3 (v) and (vi) and RC12(d).

### **Principle of Residential Use**

- 5.7 The NPPF (Paragraph 59) sets out the Government's objective of "*significantly boosting the supply of homes.*" Paragraph 118 states that decisions should promote and support the development of underutilised land and buildings, especially if this would help meet identified needs for housing.
- 5.8 Draft Local Plan Policy H1 (Provision of Housing) states that provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough of the period of 2013 to 2036.
- 5.9 Reading Central Area Action Plan Policy RC2(d) and draft Local Plan Policy RC12(d)(Development in the west Side Opportunity Area – Broad Street Mall) note that development within the West Side Major Opportunity Area will contribute towards providing a mix of uses including residential.
- 5.10 The draft Hosier Street Area Outline Development Framework further supports residential development at Broad Street Mall.
- 5.11 In accordance with the NPPF, adopted and emerging Reading Borough policies, the Proposed Development will deliver 493 high-quality residential dwellings, in a range of unit sizes, contributing towards the Council's housing stock in a central location which is highly accessible. As such, it is considered that the principle of residential development is acceptable, and the delivery of housing on the Site should be encouraged.

### **Principle of Flexible Retail**

- 5.12 At national level, the NPPF sets out the Government's commitment to securing economic growth in order to create jobs. The planning systems should encourage and not act as an impediment to sustainable growth, and local authorities should plan proactively to meet the development needs of business. Planning policies should be positive and promote competitive town centre environments and set out policies for management and growth of centres, including allocating a range of sites to meet needs for retail, leisure and other uses in full.
- 5.13 Core Strategy Policy CS25 (Scale and Location of Retail, Leisure and Culture Development) states that major retail and main town centre leisure and culture development will take place in, or as an extension to the centre of Reading.
- 5.14 Reading Central Area Action Plan Policy RC6 (Definition of the Centre) notes that retail development will take place in the Primary Shopping Area as defined on the Proposals Map.
- 5.15 Reading Central Area Action Plan Policy RC10 (Active Frontages) notes that uses on the ground floor along the designated active frontages (illustrated on the Proposals Map) will be within one of the following uses classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors.
- 5.16 Draft Local Plan Policy RL2 (Scale and Location of Retail, Leisure and Cultural Development) notes that provision will be made for up to 34,900 sqm of retail and related facilities in Reading to 2036, together with new leisure facilities.
- 5.17 The Site is located within Reading Central Area, Central Core, Primary Shopping Area and Office Core, as well as the West Side Major Opportunity Area. The Dusseldorf Way and Queens Walk elevations are designated Primary Shopping Frontage.
- 5.18 It is clear that the proposed flexible retail Use Class A1/A2/A3 is inherently appropriate for this established town centre location and will contribute towards maintaining and enhancing its vitality, viability and competitiveness
- 5.19 The proposed retail units will activate the Dusseldorf Way/Queens Walk frontages and maintain and enhance an outward facing appearance to this part of Broad Street Mall, complimenting recent internal refurbishment within the Mall itself.
- 5.20 It is considered that the proposed flexible retail floorspace will enhance the vitality and viability of the town centre, and the Proposed Development is therefore considered acceptable.

### **Design**

- 5.21 Paragraphs 124 and 127 within the NPPF state that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 5.22 Core Strategy Policy CS7 and draft Local Plan Policy CC7 (Design and Public Realm) state that all developments must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Policy CS7 further sets out the urban design objectives which the Proposed Development will be assessed against ensuring a positive contribution is made.
- 5.23 Reading Central Area Action Plan Policy RC5 (Design in the Centre) states in part that development within the Reading central area should demonstrate the following attributes:
- The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in the areas local to the development site.
- 5.24 Reading Central Area Action Plan Policy RC13b and draft Local Plan Policy CR10b (Tall Buildings- Western Grouping) state that a small number of tall buildings would be appropriate to create a distinctive grouping, focused along the line of the IDR, to mark the area as the civic heart of Reading and a gateway to the Centre. Policies RC13b and CR10b further state that tall buildings should be generally lower in height than the tallest building planned for the Station Area Cluster.
- 5.25 Hosier Street Outline Development Framework Section 5.2 (Form, Scale and Height) states in part that the master plan has been based on the principle of accommodating 3-4 tall buildings on site, one of which falls on the former civic site, whilst the remaining 3 form new towers on the Broad Street Mall upper podium level. Section 5.2 further states that a nominal building height capacity of 20 storeys above podium has been arrived at, in recognition of the height of revised consents at Station Hill.
- 5.26 As set out above and in the supporting Design and Access Statement, the Proposed Development comprises three residential buildings above Broad Street Mall ranging in height from 5 to 22 storeys, construction of an 18 storey residential building at South Court with flexible retail (Use Class A1/A2/A3) at ground and first floor, and extension of Quadrant House to create a three storey residential building.

- 5.27 As set out in the supporting Landscape Strategy, the amenity space at second floor level will benefit from high-quality hard and soft landscaping and the addition of planters, trees outdoor furniture and informal children's place space, creating an inviting space for residents.
- 5.28 The Proposed Development will use materials and architectural detailing which respond positively to the character of the local area.
- 5.29 The proposed height and massing has been influenced by the Site's accessible location within the Town Centre in addition to adopted and emerging policy which permits 3-4 tall buildings in this location. While the Proposed Development is taller than 20 storeys, it still sits below the maximum height of the revised consents at Station Hill.
- 5.30 Additionally, the application is supported by a Townscape and Visual Impact Assessment prepared by KM Heritage (included within the Environmental Statement).
- 5.31 Overall, the proposed scheme would mark a significant improvement on the existing buildings. The Proposed Development serves as an example of a development which maximises development potential whilst enhancing the existing local character and street scene.
- 5.32 It is therefore considered that the design and layout of the proposed scheme is in accordance with the NPPF, adopted and emerging policies, and is acceptable in design terms.

### **Residential Standards**

- 5.33 Core Strategy Policy CS15 (Location, Accessibility, Density and Housing Mix) states that the appropriate density and mix of residential development within the Borough will be informed by: -
- An assessment of the characteristics, including the mix of uses of the area in which it is located;
  - Its current and future level of accessibility by walking, cycling and public transport as defined by Policy CS4;
  - The need to achieve high quality design in accordance with Policy CS7; and
  - The need to minimize environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 5.34 Draft Local Plan Policy H5 (Standards for New Housing) states that new building housing should be built to the following standards:
- All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard;

- All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3) (see below).
  - On developments of over 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the building Regulations.
- 5.35 Reading Area Action Plan Policy RC9 and Draft Local Plan Policy CR6 (Living in Central Reading) state that all proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of the units should be 1 bed/studios, and a minimum of 5% of units should be at least three bed, unless it can be clearly demonstrated that this would render a development unviable.
- 5.36 Sites and Detailed Policies Document Policy DM5 (Housing Mix) states that all new-build dwellings in any location will be built to Lifetime Home Standards.
- 5.37 The draft Hosier Street Area Outline Development Framework Section 5.1 (Housing Mix) states as a guide, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed units.
- 5.38 Core Strategy Policy CS29 (Provision of Open Space) states in part that all new developments should make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space.
- 5.39 Site and Detailed Policies Document Policy DM10 (Private and Communal Outdoor Space) notes dwellings will be provided with functional private or communal open space that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space.
- 5.40 Draft Local Plan Policy H10 (Private and Communal Outdoor Space) indicates that in the past the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals:
- For Flats outside Central Reading:
    - 1 and 2 bedrooms: 25 sqm per flat;
    - 3 or more bedrooms 40 sqm per flat

- Development in central Reading will not always be expected to comply with standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.

5.41 As set out in the Design and Access Statement, the Proposed Development provides 5% of the dwellings as wheelchair accessible in accordance with draft Local Plan Policy H5.

5.42 The Proposed Development sees to provide 493 units comprising 214 (43.4%) 1 bed units, 253 (51.3%) 2 bed units and 26 (5.3%) 3 bed units. The residential mix is further broken down below:

|                     | 1 bed | 2 bed | 3 bed | Total |
|---------------------|-------|-------|-------|-------|
| <b>No. of units</b> | 214   | 253   | 26    | 493   |
| <b>%</b>            | 43.4% | 51.3% | 5.3%  | 100%  |

*Table 5.1 – Residential unit mix*

5.43 Although adopted policy indicates that new build housing within central Reading does not require the Proposed Development to meet nationally-described space standard, as set out in the Design and Access Statement and supporting floor plans, the units are well laid out.

5.44 As set out in the Landscape Strategy, a generous amenity area with hard and soft landscaping and children's play area is provided for residents at podium deck level.

5.45 It is therefore considered that the scheme provides an excellent standard of residential accommodation for all tenures, in accordance with relevant national and local standards.

### **Affordable Housing**

5.46 Paragraph 62 within the NPPF states where LPAs have identified that affordable housing is needed, they ought to set policies for meeting this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.

5.47 Core Strategy Policy CS16 (Affordable Housing) states all developments of 15 dwellings and above will provide 30% of the total number of dwellings in the form of affordable housing. In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken.

5.48 Draft Local Plan Policy H3 (Affordable Housing) requires 30% of the total dwellings be in the form affordable housing on sites of 10 or more dwellings and also notes that in all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken.

- 5.49 Draft Local Plan Policy H4 (Build to Rent Schemes) states that planning permission will be granted for developments of self-contained, private rented homes which:
- Are secured in single ownership providing solely for the rental market for a minimum of 30 year term with provision for clawback of affordable housing contributions should the covenant not be met; and
  - Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agree in advance; and
  - Provide a high standard of professional on-site management and control of accommodation; and
  - Meet Reading Borough Council's Rent with Confidence Standards; and
  - Provide a mix of unit sizes in accordance with Policy H2 or CR6; and
  - Meet the standards of design set out in Policy H5; and
  - Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.
- 5.50 The Council wishes to encourage a private rented sector which provides a high quality, professional managed accommodation and greater level of security for tenants that which is offered by much of the current PRS market.
- 5.51 RBC accept that as Built to Rent developments are dependent on long term rental income rather than early sales, their funding is inevitably long term, and operates to different viability models compared to for sale schemes. The Council will expect the viability appraisal to also provide information on the viability of the development as a for sale scheme.
- 5.52 Reading Central Area Action Plan Policy RC9 (Living in the Centre) notes that development in the central area will contribute towards affordable housing in line with Policy CS16 and an over- concentration of social renting for single persons will be avoided.
- 5.53 The importance of affordable housing in the context of Reading Borough Council's adopted and emerging policy is fully acknowledged. The Applicant will endeavor to deliver the maximum reasonable amount of affordable housing as part of the Proposed Development, subject to viability testing.

### **Residential Density**

- 5.54 Core Strategy Policy CS15 (Location, Accessibility, Density and Housing Mix) sets an indicative town centre density above 70 dwellings per ha.

- 5.55 Draft Local Plan Policy H2 (Density and Housing Mix) notes that appropriate residential densities will be informed by a number of factors including: accessibility, effective use of land and the character and mix of uses in the area. An indicative density for the Town Centre as set out in Policy H2 is above 100 dwellings per ha.
- 5.56 The scheme proposes a total of 493 dwellings, resulting in a residential density of 265.1 dwellings/ha.
- 5.57 It is considered that the proposed scheme optimizes the development potential of previously developed site in an area of Reading where land is at a premium, whilst delivering a scheme of exceptional architectural quality, providing 493 much needed residential units towards the Boroughs housing stock. As such, the scheme is considered acceptable in density terms.

### **Residential Amenity**

- 5.58 Paragraph 127 within the NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future users of place. Furthermore, national guidelines for daylight and sunlight issues are contained with BRE guidelines, local policy refer to these guidelines as the accepted standard.
- 5.59 Paragraph 170 within the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 5.60 Paragraph 180 within the NPPF states that planning decisions should aim to avoid noise giving rise to adverse impacts on health and quality of life as a result of new development.
- 5.61 Paragraph 181 further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).
- 5.62 Draft Local Plan Policy CC8 (Safeguarding Amenity) states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residents.
- 5.63 A Daylight and Sunlight Assessment has been prepared by GVA (included within the Environmental Statement) which includes a detailed technical analysis to quantify the effect of the proposed development upon the daylight and sunlight amenity to the existing properties.
- 5.64 The effect of the Proposed Development upon the daylight and sunlight amenity to existing neighbouring properties is considered acceptable in line with adopted and emerging Reading Borough Council planning policy.

- 5.65 This application is accompanied by a Noise Impact Assessment prepared by Hoare Lea (included within the Environmental Statement) which details the results of a noise survey undertaken. The assessment details the baseline noise conditions derived from survey findings, sets out the design criteria for new building plant to comply with Reading Borough Council requirements and sets out any required mitigation measures.
- 5.66 A Ventilation and Extraction Statement prepared by BJB accompanies this application. The document identifies the measures being put in place to manage environmental effects arising from the proposed uses, namely acoustic measures and silencers for building plant, flues terminating above roof level and kitchen extract systems discharging in discreet locations with appropriate levels of filtration.
- 5.67 It is therefore considered that the Proposed Development is in accordance with adopted and emerging local plan policy in relation to safeguarding amenity in terms of smell.

### **Heritage and Archaeology**

- 5.68 An Archaeology Assessment prepared by Museum of London Archaeology (MOLA) and a Heritage Statement prepared by KM Heritage accompany this application and are included within the Environmental Statement.
- 5.69 Draft Submission Local Plan Policy EN2 (Areas of Archaeological Significance) requires the assessment of the archaeological impacts of development proposals to be submitted as part of the planning application submission. In line with emerging Local Plan Policy EN2, an Archaeological Assessment prepared by MOLA accompanies this application.
- 5.70 Chapter 16 of the NPPF (Conserving and Enhancing the Historic Environment) deals with Heritage Assets describing them as an irreplaceable resource that should be conserved in a manner appropriate to their significance.
- 5.71 Local Plan Policy CS33 and draft Submission Local Plan Policy EN1 (Protection and Enhancement of the Historic Environment) note that historic features and areas of historic importance and other elements of the historic environment, including their setting, will be protected and where appropriate enhanced.
- 5.72 Draft Submission Local Plan Policy EN6 (New Development in a Historic Context) requires new development to make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities.

### **Transport, Accessibility and Servicing**

- 5.73 At a national level, the NPPF states that development should take opportunity to promote walking, cycling and public transport use (see Paragraph 102).

- 5.74 Core Strategy Policy CS24 (Car/Cycle Parking) notes that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough.
- 5.75 A Transport Statement prepared by Connect accompanies this application and is supported by a Delivery and Servicing Plan, and Travel Plan. The Transport Statement demonstrates the acceptability of the proposed development in respect of the effect of the proposals on the local highway network, specifically in relation to the approach to car parking, deliveries and servicing.
- 5.76 The Site contains an existing multi-storey car park which comprises 700 car-parking spaces spread across three floors, part first, second and the upper podium level. The car park is publicly accessible and operates 24 -hour, seven days a week.
- 5.77 As noted above, 60 car parking spaces within the existing car park will be lost to facilitate residential cores, introduction of 24 accessible parking spaces and realignment of vehicular routes.
- 5.78 RBC's Revised Parking Standards and Design SPD set out the car and cycle parking standards for the Borough. As set out in the Transport Statement, and in accordance with RBC policy, 260 secure cycle parking spaces are provided for residents within the basement of the existing car park.
- 5.79 In accordance with Core Strategy Policy CS2 (Waste Minimisation) and Draft Submission Local Plan Policy CC5 (Waste Minimisation and Storage), the Proposed Development includes adequate space for refuse facilities as detailed in the Design and Access Statement and Transport Statement.
- 5.80 On the basis of the assessment undertaken as part of the Transport Statement, the scheme is considered to comply with paragraphs 110 and 11 of the NPPF, where sustainable transport solutions are promoted, safe and suitable access can be achieved and efficient delivery and servicing can be accommodated. It is also consistent with Core Strategy Policies CS2 and Draft Submission Local Plan Policy CC5.

### **Flood Risk and Drainage**

- 5.81 A Flood Risk Assessment and Drainage Strategy has been prepared by BJB accompanying this application.
- 5.82 The NPPF and accompanying National Planning Practice Guidance (NPPG) set out the Government's national policy on development and flood risk and seeks to provide clarity on what is required at regional and local levels to ensure flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk. The NPPF outlines a risk based approach to the planning process and requires a Sequential Test is used in cases where sites are

located in vulnerable flooding zones to guide the decision making process by steering development to areas with the lowest probability of flooding where feasible.

- 5.83 The NPPG also provides details of how all new development must include appropriate consideration of the potential effects of climate change on flooding and the hydrological regime, within the Flood risk assessments: climate change allowances (last updated February 2017). The NPPG refers to the Environment Agency's Guidance to support the NPPF. Depending upon the specific River Basin District that the proposed development site lies within, the guidance indicates precautionary increases in fluvial flows, sea levels and rainfall intensities that should be applied when assessing the risk of flooding, from now until 2115.
- 5.84 Core Strategy Policy CS35 (Flooding) states that planning permission will not be permitted for development identified as being at high risk of flooding, where development would reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increases the risk to life and property arising from flooding.
- 5.85 Draft Local Plan Policy EN18 (Flooding and Sustainable Drainage Systems) notes that development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF.
- 5.86 As set out above, the Site contains Broad Street Mall and is brownfield in nature 100% impermeable
- 5.87 The Site is in an area designated as Flood Zone 1 and lies in an area classified as 'low' risk of surface water flooding.
- 5.88 It is therefore considered that the Proposed Development is in accordance with National and Reading Borough Council adopted and emerging policy.

### **Energy and Sustainability**

- 5.89 An Energy and Sustainability Statement (inc. BREEAM Pre-assessment) has been prepared by Hoare Lea and accompanies this application.
- 5.90 The Proposed Development will aim to achieve a high level of environmental performance to minimise its carbon footprint. This will be achieved by designing the buildings to have high standards of insulation to minimise the energy uses and using on-site renewable energy generation and low carbon technologies.

## 6.0 CIL AND PLANNING OBLIGATIONS

### Community Infrastructure Levy (CIL)

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

### S106 Obligations

- 6.3 The scope of any prospective Section 106 Agreement will be subject to further detailed discussions during determination of the application. Obligations will be in accordance with Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended), which are:
- Necessary to make the development acceptable in planning terms;
  - Directly related to the development; and
  - Fairly and reasonably related in scale and kind to the development.
- 6.4 Reading Borough Council has an adopted Planning Obligation SPD. In listing the draft Heads of Terms below, regard has been had to the Planning Obligations SPD (April 2015). It is proposed that the Section 106 Agreement may contain planning obligations which could secure obligations for the following:
- The provision of affordable housing;
  - Employment and Training Strategy for the construction and operational phase of the Proposed Development;
  - Travel Plan;
  - S278 Works as may be required; and
  - S106 monitoring costs.
- 6.5 The Draft Heads of Terms are provided without prejudice.

## **7.0 SUMMARY & CONCLUSIONS**

- 7.1 This Planning Statement has been prepared by DP9 Ltd to accompany an application for planning submission submitted on behalf of Inception (Reading) Sarl for the proposed mixed-use development at Broad Street Mall.
- 7.2 Detailed planning permission is sought for the erection of a part 7 and part 8 storey building, enabling works and means of access works to form a new Premier Inn and Bar & Block Steakhouse in Central Reading.
- 7.3 The planning application is submitted following pre-application engagement with Reading Borough Council planning and highways officers, as well as a public exhibition.
- 7.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 7.5 This Planning Statement assesses the Development against the Development Plan and other relevant national and local planning policy and guidance.
- 7.6 The Proposed Development is appropriately located for residential and flexible retail uses within Central Reading and the West Side Major Opportunity Area. The scheme is located on previously developed land and would preserve and enhance the adjacent Conservation Area's and nearby listed buildings.
- 7.7 The Proposed Development will result in a number of tangible benefits, including an enhanced visitor offer in the area in the form of 493 residential dwelling units, significantly contributing to Reading Borough Council's housing targets, flexible retail floor space at ground and first floor levels of Dusseldorf Way and Queens Walk which maintains and enhances an outward facing appearance to this part of Broad Street Mall, job and training opportunities in both the construction and operational phases, S106 obligations and CIL, together with other fiscal benefits.
- 7.8 On the basis that the supporting documents submitted as part of this planning application have demonstrated compliance with the requirements of the NPPF and the adopted Development Plan, it is therefore considered entirely appropriate to grant Planning Permission for the Proposed Development without delay.