
Planning Statement

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



Planning Statement

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



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1. Executive Summary

- 1.1. This statement has been prepared in support of a planning application for the redevelopment proposals for 173 – 175 Friar Street and 27 – 32 Market Place to provide a mixed used residential, retail, office and leisure development. The redevelopment will provide 43 new residential dwellings in the borough and enhance retail facilities and employment opportunities for Reading Town Centre
- 1.2. The replacement building at Friar Street, will be designed to a high quality standard taking references from the surrounding context and adjacent buildings. High quality materials have been selected to ensure that the building is of the highest possible standard to fully integrate within the streetscene. The materials will also ensure that the building is durable and attractive for the duration of its existence.
- 1.3. The proposed scheme includes the opportunity to repair, refurbish and reinstate active uses to three vacant listed buildings at 27 – 32 Market Place. The buildings have been vacant for approximately 10 years and the scheme will provide a heritage benefit in bringing these buildings into a viable use.
- 1.4. The proposals will deliver 43 new high quality residential dwellings within the core town centre area, and will contribute towards the borough's affordable housing targets by providing 30% on site affordable housing units.
- 1.5. Overall, the proposals will deliver a net increase in employment floorspace, creating new jobs for the borough by introducing 4,212 sqm of new B1 floorspace. The proposals will also provide new retail floorspace at ground floor level, reinstating active frontages to Friar Street and will re-provide a public house at 29 – 31 Market Place.
- 1.6. The proposed scheme will deliver a series of planning benefits not just in terms of the uses proposed but in relation to the regeneration benefits that the proposals will bring to not just the site and the wider Reading town centre, the Section 106 / CIL contributions as well as a range of significant socio-economic benefits.
- 1.7. The redevelopment proposals will also re-provide the public access route through the site to connect Friar Street and Market Way. The route will also reinstate a historic connection between Friar Street and Broad Street via the Sainsbury's supermarket.

2. Introduction

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

“Demolition of vacant former Bristol & West Arcade (173 – 175 Friar Street) and redevelopment of site to provide an eight storey mixed –use building plus one level of basement comprising 35 residential units, 4,212 sqm of B1 office floorspace, and 5 retail units (A1/A2/A3), together with the change of use of 27 - 28 Market Place at first, second and third floors and basement to provide 2 residential units, change of use of 29 - 31 Market Place at first, second and third floors to provide 3 residential units, change of use of 32 Market Place from A2 use to provide part basement and ground floor flexible retail use (A1/A2/A3) and 3 residential uses at first, second and third floors, retention of 260.4 sqm of A4 use at ground and basement floor at 29-31 Market Place and change of use at ground and basement of 27 - 28 Market Place to flexible retail use (A1/A2/A3) and demolition of rear parts of 29 – 31 Market Place and 32 Market Place, associated internal and external works to the Listed Buildings, landscaping, refuse, plant, cycle stores and substation at basement level”

- 2.2. This application follows several extensive pre-application discussions with the Local Planning Authority (LPA) and Local Councillors over a two year period. A previous iteration of the proposed scheme has also been presented to the Council’s Design Review Panel (DRP) in October 2016 and undergone public consultation events offering local residents, amenity groups and local businesses an opportunity to view and respond to the proposals. Various revisions have been made to the proposals and further information collated in order to address the discussion held and advice received from these stakeholders.
- 2.3. This application is also subject to a draft Planning Performance Agreement (PPA) to set out the timescales of the application moving forward in relation to the statutory 13 week determination period.
- 2.4. The applications are supported by a suite of documents prepared by various consultants and these documents will be referenced throughout this statement where relevant. The supporting documents include:
- Application forms;
 - CIL Forms;
 - CIL Relief Forms;
 - Site Location Plan;
 - Draft Planning Performance Agreement;
 - Existing and proposed plans, prepared by RDA;;
 - Demolition plans, prepared by RDA;
 - Design and Access Statement, prepared by RDA;
 - Heritage Report, prepared by Turley;
 - Archaeological Report, prepared by CgMs;
 - Daylight and sunlight report, prepared by Delvar Patman Redler;
 - Transport Assessment, prepared by Motion;
 - Travel Plan, prepared by Motion;
 - Energy Statement, prepared by Price & Myers;

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- BREEAM Pre-Assessments, prepared by Price & Myers;
- Wind Assessment, prepared by RWDI;
- Acoustic Assessment, prepared by RBA Acoustics;
- Bat Survey Report, prepared by CSA Environmental;
- SUDs Report, prepared by Clancy Consulting.

2.5. This statement finds that the proposed development complies with the Development Plan which comprises Reading's Core Strategy (2008; updated 2015), Reading's Sites and Detailed Policies (2012; updated 2015) and the Reading Central Area Action Plan (2009), as well as other relevant material considerations including the Council's Emerging Pre-Submission Draft Local Plan and the National Planning Policy Framework (NPPF). This statement will set out that the proposal will deliver sustainable development in accordance with the NPPF and will conclude by setting out the public benefits that will be brought forward by the scheme.

3. Site Context

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

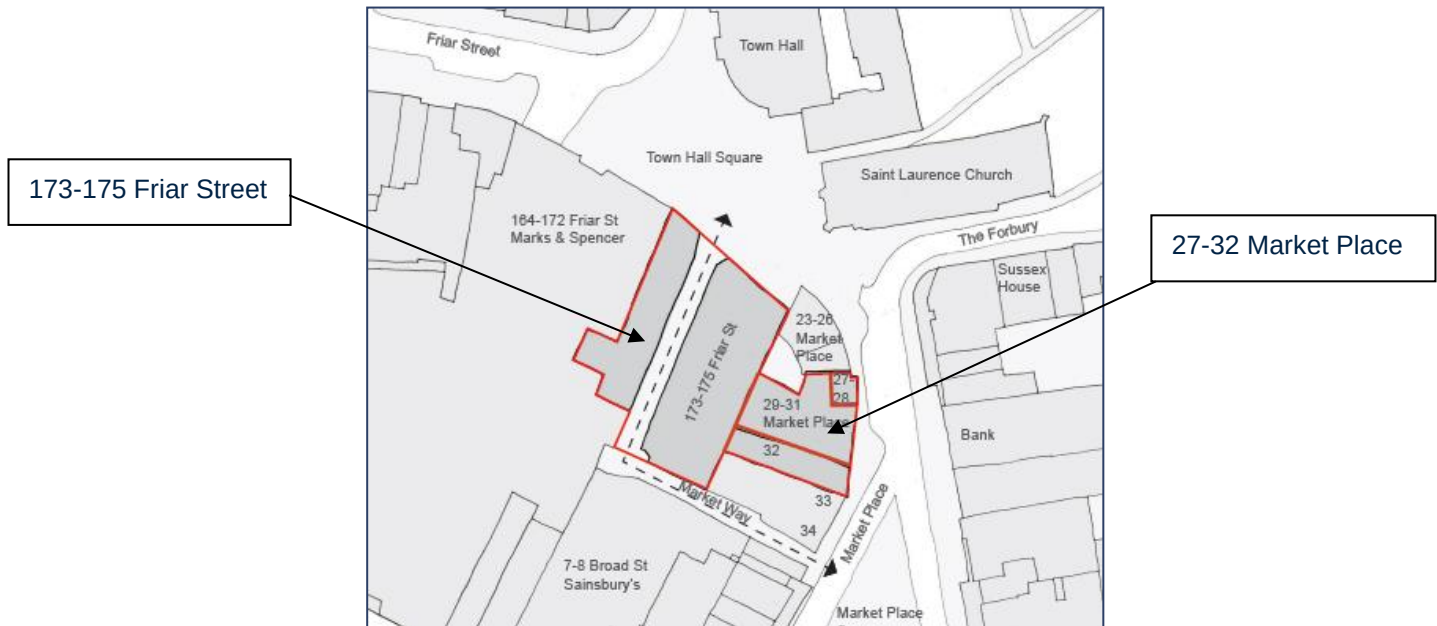


Figure 1 – Existing Site

- 3.2. The site lies partly within the Market Place/ London Street Conservation Area and the properties which front Market Place are Grade II Listed. Copies of the full Listing Descriptions are provided at Appendix 1.
- 3.3. The site is located within the designated central core of Reading, where active frontages are encouraged at ground floor level, and a mixture of town centre uses, including residential, are welcomed. The site is in a key central location, being situated on the corner of the Town Hall Square and in close proximity to Reading rail station to the north (a key transport hub) and key town centre destinations such as the Oracle to the South. Also in close proximity to the site is The Town Hall, Reading County Court and the Grade I Listed St Lawrence Church. The Forbury Gardens are also within walking distance.
- 3.4. As a result, the application site lies in a highly accessible location with access to several local bus services and is in close proximity to Reading Station which will also be served by Crossrail in the near future.
- 3.5. Given its location in a prominent position in Reading Town Centre, it is essential that viable proposal to reinvigorate this vacant and derelict site comes forward.
- 3.6. According to the Council's Proposal Map, the site is also subject to the following site specific designations:
- Existing active frontage

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- Area of Archaeological potential
- Central Core
- Office Core
- Primary Shopping Area
- Air Quality Management Area
- Reading Central Area
- Partially within the Market Place / London Road Conservation Area.

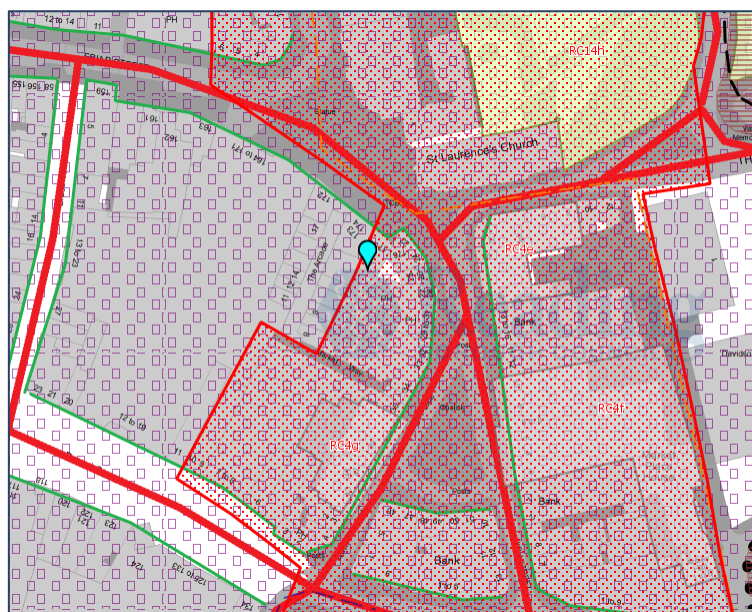


Figure 2 – Extract from Reading's Proposal's Map

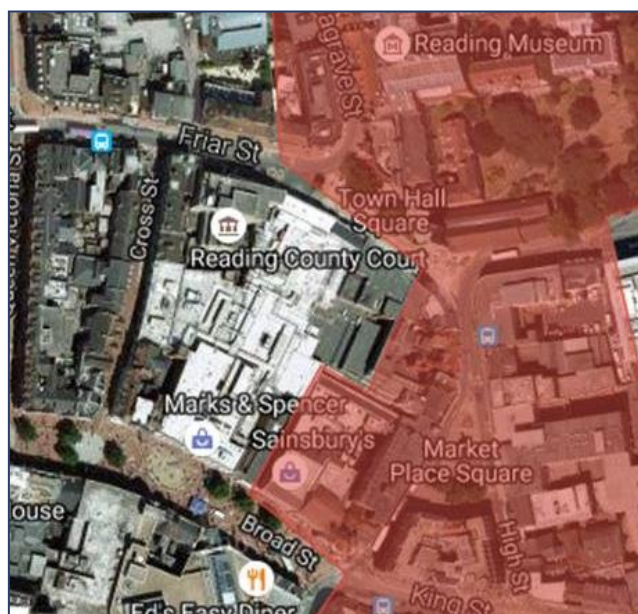


Figure 3 – Market Place / London Road Conservation Area Boundary

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- 3.7. The application site does not lie within an area at risk of flooding (Flood Zone 1) and only partially at low-medium risk from surface water flooding within the existing public walkway.
- 3.8. As part of the Council's recent consultation on their new Local Plan, the applicant submitted representations on the application site for its allocation within the emerging Local Plan. According to the latest consultation document (Draft Pre-Submission Local Plan 2017), the application site has been put forward for a mixed-use allocation to include retail, offices and/ or up to 54 residential units across the site (173-175 Friar Street and 27 – 32 Market Place ref: CR14d – See Appendix 2). It is also noted that the site appears on part 1 of the Council's Brownfield Register (site reference BL1015 – December 2017) to further demonstrate the Council's commitment to bring this site forward for redevelopment.
- 3.9. There are no further site specific designations that apply to the site.

173 – 175 Friar Street

- 3.10. This part of the site is currently vacant and in a poor state of repair. The building was constructed in the 1950s and is comprised of two formerly separate properties: 173 – 174 Friar Street and 175 Friar Street. The combined properties now comprise a vacant covered retail arcade with three floors of vacant office accommodation above.
- 3.11. The retail arcade previously provided a pedestrian route from Friar Street through to Market Place, however this route is now rarely used, partly because it has been compromised by the location of Sainsbury's to the southern section and partly because of the unsafe environment for pedestrians, especially during the hours of darkness.
- 3.12. The entrance to pedestrian access route has been blocked off from Friar Street and secure gates are used to restrict access from Market Place. These gates are locked by Sainsbury's in line with their opening hours.
- 3.13. To the rear of the Former Arcade, construction works have been carried out under planning permission ref: 061033, and halted around 2008 around the time of the market crash. These works reveal that his planning permission, granted in 2007 was partially implemented in accordance with the provisions of S.56 of the Act which was presented through a formal pre-application submission in February 2016 (ref: 160184/PREAPP).

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Figure 4 – Existing Friar Street building



Figure 5 – Former entrance to the retail arcade

27 – 32 Market Place

3.14. The second part of the site comprises those properties located on Market Place (Nos. 27 -28, 29 – 31 and 32 Market Place), which are all Grade II Listed, and currently vacant.

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- 3.15. Originally built in the 17th Century, these properties have been altered and remodelled over the years, with the whole site having been occupied by multiple different tenants. This has resulted in some odd layouts, for instance the rear of Nos. 27 – 28 is incorporated into the adjacent former public house. There are, however, several elements of historic interest as identified in the listing descriptions (included at Appendix 1) and studied in more detail in the submitted Heritage Report, prepared by Turley.



Figure 6 – 27 & 28 Market Place



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

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Figure 8 – 32 Market Place

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

Surroundings

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

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



Figure 10 – Ibis Hotel, Friar Street

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4. Planning History

- 4.1. The application site has an extensive planning history relating to the various properties that are included within the boundary of the site. The full planning history is provided below:

173 – 175 Friar Street				
Reference	Address	Development	Date	Decision
61033	175 Friar Street	Refurbishment of shopping arcade and offices. Partial demolition and addition of health club and 14 dwellings.	20.03.2007	Permitted
60795	175 Friar Street	Refurbishment of shopping arcade and offices (including partial demolition), construction of new gym and 14 apartments (12 x 2 bed and 2 x 3 bed)	15.11.2006	Refused
61338	175 Friar Street	Demolition to rear of part first floor 4 shop units and roof light reconstruction of retail units with a new glazed wall and new roof	08.08.2006	Permitted

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

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110853	27 – 32 Market place	LBC: Works associated with the change of use of building to basement bar (class A4 use), ground floor retail units, and a mixed use hotel/restaurant/bar (class C1/A3/A4) on the first, second and third floors. Partial demolition of rear of building, three storey extension to the rear, refurbishment of building, and new Market Place façade.	13.01.2012	Permitted
120532	32 Market Place	Change of use of the first, second and third floors from office use to residential accommodation	14.08.2013	Permitted

Extant Permission ref: 06/01560/FUL

- 4.2. Perhaps the most relevant planning permission is the 2007 approval which obtained permission for the following development,

“Refurbishment of shopping arcade and offices. Partial demolition and addition of health club and 14 dwellings”

- 4.3. This permission saw consent for a mixed use 5 storey building with three tower elements within the Friar Street element of the site rising to a total of 8 no. of stories. The proposals retained retail uses at ground floor level with offices, health club and residential units above. This application did not include the refurbishment or repair of the properties on Market Place and therefore had limited heritage benefits when compared to the current application.



Figure 11 – view from corner of Friar Street and Blagrove Street

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Figure 12 – 2007 Consented scheme from Blagrove Street



Figure 13 – view of consented massing from entrance to Forbury Park

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Figure 14 – View of consented scheme from the Forbury

Status of 2007 Consent

- 4.4. Works were undertaken following the consent to implement the permission. Works were undertaken to the rear of the site where the beginning of the swimming pool is visible (see Figure 15). The development was never completed, presumably due to market conditions at the time however it is considered that it sets the baseline for what has already been considered acceptable at the site in terms of height and design.



Figure 15 – Construction works to the rear of the arcade

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- 4.5. A pre-application enquiry (ref: 160184/PREAPP – See Appendix 4) was made to the Council regarding whether this planning permission had been lawfully implemented. The Council concluded that,
- “it would appear that permission 06/01560/FUL/061033 was physically implemented. However, it would appear that not all pre-commencement conditions were agreed, and, as such, it is not clear as to whether the permission was lawfully implemented or not”.*
- 4.6. We note that Officers stated during the pre-application meetings in late 2016 that the consented scheme is considered to be a ‘line in the sand’ for future development proposals. The permission does however establish the principle of the height and land uses as a basis for developing new proposals.

Permissions at 27 – 32 Market Place

- 4.7. Permission was granted in 2008 at 29 - 31 Market Place for the change of use of the buildings to a basement bar, ground floor retail, and mixed use hotel/restaurant/bar on the first, second and third floors (ref: 80740). Permission was also approved under this application for the partial demolition of the rear of the buildings, and a three storey extension in this location to accommodate the uses permitted on each floors. This application was extended in 2012, but has since expired (ref: 110852).
- 4.8. During the pre-application discussions, there has been no objections to the proposed re-provision of a reduced size A4 unit at 29 – 31 Market Place which was considered acceptable in 2012 (ref: 110852). No objections have also been raised relating to the demolition works to the rear of the Market Place properties nor the proposed mix of uses proposed (retail at ground floor and residential above).
- 4.9. It should also be highlighted that permission has also previously been granted (ref: 120532) for the change of use of the upper floors of 32 Market Place to residential. This permission demonstrates that the principle of C3 has previously been considered acceptable in terms of land uses, residential amenity and heritage.

5. Pre-application discussions

- 5.1. The applicant has sought extensive pre-application advice from Reading Borough Council across a period of two years with the first level 1 scoping meeting held in January 2016. Four further meetings have been held between the applicant and Reading Council across the 25 month period. The first three pre-application meetings were in relation to a previous residential scheme and only parts of the Council's subsequent written responses are considered to be relevant in this regard. The previous iteration of the scheme was also presented to the Council's Design Review Panel in June 2017.
- 5.2. During the pre-application process, public engagement was carried out including a public exhibition with letters sent to adjacent land owners. The proposals have also been thoroughly discussed with local Ward Councillors and other stakeholders including Historic England.
- 5.3. A Statement of Community Involvement is included as part of this planning statement to provide further detail on the consultation strategy and the feedback received.

Consultation Summary

Reading Borough Council

- 5.4. The redevelopment proposals have been subject to regular meetings with Susanna Bedford and Lynette Baker within the Council's planning department. Each iteration of the scheme has been presented to officers through their formal pre-application route and consulted with various internal consultees including heritage, transport, environmental health and affordable housing.
- 5.5. Various additional design submissions were made to the LPA during the pre-application process, in consultation with Historic England and the Council's Heritage Consultants. Each submission and design iteration has been revised to respond to officer comments.
- 5.6. Five written responses were issued by the Local Planning Authority as a record of the pre-application discussions as follows:
 - Scoping Request Response dated 07 January 2016 (Appendix 3)
 - Pre-application Response dated 19 February 2016 (Appendix 4)
 - Pre-application Response dated 24 January 2017 (Appendix 5)
 - Pre-application Response dated 24 May 2017 (Appendix 6)
 - Pre-application Response dated 19 July 2017 (Appendix 7)
- 5.7. Whilst the majority of the responses relate to previous iterations of the scheme where the scheme comprised a predominately residential scheme, a response to the advice received is provided below. The response is considered where it relates to design, heritage and land uses which remain relevant.
- 5.8. The final meetings with RBC in January 2018 involved the design and uses that now form part of this application and comments were received via email. Officers considered that the uses were acceptable and that the scheme had responded to previous concerns.

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Design Review Panel

- 5.9. On the 08 June 2017, the site was presented to Reading's Design Review Panel. The formal response from the DRP was received on the 19 July 2017 (attached at Appendix 8).
- 5.10. The scheme that was presented at the DRP was the third iteration of the scheme which provided 64 residential units, retail accommodation at ground floor and extended to nine storeys in height.
- 5.11. Based on the advice received, the proposal has evolved and now responds to the comments of the DRP as set out below.

Ward Councillors

- 5.12. The applicant has met with Cllr Tony Page on a regular basis to discuss the proposed scheme. Cllr Page has been interested in the proposals at the site, recognising its significant period of vacancy and potential for re-use. The last meeting with Cllr Page was held on the 25 January 2018 to review the latest scheme iteration and it is understood that regular conversations have been held between officers and Cllr Page.
- 5.13. No formal comments have been received from Cllrs however the views of Cllr Page have been primarily related to affordable housing to which the scheme has successfully responded.
- 5.14. Again, the scheme has positively responded to the matters discussed during the pre-application meetings with Cllr Page as set out below.

Historic England

- 5.15. The applicant entered into pre-application discussions with Historic England under their paid extended pre-application advice service (ref: PA00481645). Key discussions were held between the applicant and HE in early 2017 with the appointed Inspector, Richard Peats, attending a pre-application meeting at the Council's offices in March 2017 (ref: 170456/PREAPP).
- 5.16. The Inspector also welcomed further ongoing dialogue following the meeting. A further workshop meeting was held on the 19 April 2017 at the architect's offices between the project team and Historic England. The main discussions in 2017 related to the residential scheme which formed the basis for Historic England's written response dated 03 April 2017 (see Appendix 9). Following the written response, revised drawings were submitted to Historic England for comment. An email response was received on the 02 May 2017 (see Appendix 10) which had reviewed the amended drawings and provided general support for the third option submitted which was considered to, *"work well as it gives each a distinct identity whilst ensuring that the majority of the façade remains on the building line"*.
- 5.17. Further to the 2018 amendments to the scheme to provide an increased level of office floorspace, amended drawings were sent again to Richard Peats for his comment on the 30 January 2018. From the previous discussions with Historic England, their main concerns related to the design of the Friar Street elevation on the basis that No. 175 Friar Street is identified as a building of townscape merit, although there was no objection in principle to its replacement.

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5.18. A further email response was received from Historic England on the 07 February 2018 which was largely positive of the proposed design and accepts the rationale behind the changes made. A copy of this response is attached at Appendix 11. Further detailed elevational treatment was suggested by Historic England however this can be secured through the determination of this application.

Response to Consultation Discussions

Land use

- 5.19. The scoping request response (07.01.2016 – ref: 152232/PREAPP) sets out the Council's support in principle for proposals at the site coming forward. The same note also highlights that there is support for residential in this particular location which is echoed in the first pre-application written response dated 24 January 2017.
- 5.20. The January 2017 response (ref: 161748/PREAPP) also encourages ground floor active frontage uses, particularly A1 uses, to support its siting within the Town Centre. The Council also gave support to the re-provision of a smaller public house (A4 use) to the Market Place.



Figure 16 – Pre-application 1 design June 2016

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Figure 17 – Pre-application 1 design June 2016



Figure 18 – Pre-application 2 design March 2017

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Figure 19 – Pre-application 2 design March 2017

- 5.21. Pre-application advice note 2 (24.05.2017 – ref: 170456/PREAPP) sets out the Council's requirement for a 30% target of affordable housing provided on site, pepper potted across the development. The affordable housing is recommended to be in a 70% social rented and 30% low-cost home ownership split to meet local demand. The advice note dated 19 July 2017, which attaches the Design Review Panel Comments (ref: 161748/PREAPP (II)) sets out that the proposed unit mix would be suitable for a town centre location however a non-compliant mix could be considered appropriate subject to further justification.
- 5.22. The pre-application meeting in January 2018 considered the retention and uplift of B1 office floorspace at the site. The Council's response (12 February 2018) is in the context of the emerging local plan allocation for the site which seeks a mix of retail, office and residential uses. The scheme therefore complies with emerging Policy CR14d.
- 5.23. In direct response to the above matters, the applicant has re-designed the scheme to include additional town centre uses. The proposals not only replace the existing B1 use, but significantly improves the previous levels of retail and office floorspace on site. The scheme, as submitted, proposes a lower level of residential units than presented under the first three pre-application schemes in order to incorporate the office floorspace. It achieves a policy compliant level of on-site affordable housing (30%) in the Council's preferred tenure split.
- 5.24. The proposed scheme now provides 43 residential units in a range of sizes to respond to the needs of Reading Town Centre.
- 5.25. Retail uses will continue to be located at ground floor providing active frontages and the retained arcade feel with the re-positioned public route through the site. The scheme will also re-provide an A4 unit at 29 – 31 Market Place as per the Council's requirements.

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- 5.26. 4,212 sqm of B1 office floorspace will be created within the Friar Street building to provide an approximate uplift in employment floorspace of 2408.8 sqm. This will equate to 200 no of new jobs for Reading in an accessible and suitable location (using Reading's calculation of 21 sqm per employee in the Affordable Housing SPD) and 324 new employees based on the HCA Guidance.



Figure 20 – Proposed design as submitted

Design – massing, height and bulk

- 5.27. A full response to design and townscape matters is set out in the supporting Design and Access Statement, pages 38 - 41.
- 5.28. A continued theme throughout the pre-application discussions has revolved around the proposed massing and bulk at upper floor levels. Throughout the pre-application process, the scheme has evolved with the height, massing and bulk of the proposal being reduced substantially with high levels of massing being cut back at 6th and 7th floors and to the height of the Friar Street elevation.
- 5.29. At proposed 6th and 7th floor level, the proposed scheme will provide residential floorspace which assists in delivering a viable scheme and new homes, including affordable homes, for the Borough. A full justification for the mix versus the massing proposed is also provided by Savills' Reading Development team.
- 5.30. At the January 2018 pre-application meetings, whilst the Council raised concerns with the proposed massing and bulk there was a recognition that there are significant public benefits that will be delivered from the proposed scheme. This statement will demonstrate how these benefits outweigh any harm relating to the massing and bulk at these levels. These benefits and this assessment is detailed within this statement.

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Design – Heritage

- 5.31. A Heritage Statement has been prepared by Turley, and is submitted as part of this application. Please refer to this report for a further detailed response to the heritage comments.
- 5.32. The proposed internal and external alterations to the Listed Buildings at Market Place have been broadly considered acceptable including the proposed demolition works and internal alterations throughout the pre-application discussions, particularly with Historic England. There is an extensive planning history relating to works associated with changes of use to these properties as well as the partial demolition works. On this basis, the proposed scheme is considered to comply with the previous approvals and is again acceptable.
- 5.33. The main heritage concern as set out in the written responses, relates to the replacement design of the Friar Street elevation, as No. 175 is of townscape merit and in close proximity to the Grade I Listed St Laurence Church. As a result of these concerns, significant attention has been paid to ensuring that this elevation is of exemplary design quality. The design is such that it provides a positive enhancement to the character and appearance of the area. The revised design has since been largely supported by Historic England in their February 2018 response (see Appendix 11).

6. Community Consultation

- 6.1. As part of the preparation of this application, a community exhibition was held for local residents and businesses to view and comment on the proposals at the Novotel (25b Friar Street, Reading, RG1 1DP) on Friday 21 July between 3pm and 7:30pm.
- 6.2. It should be noted that the scheme has evolved since the exhibition. The scheme has improved the design, increased the commercial uses at the site and provides 30% on-site affordable housing therefore some of the responses are not relevant to the current application, on the basis that the proposals have changed and have responded to these matters.
- 6.3. Approximately 200 letters were sent to local residents and businesses notifying them of the event and to provide contact details should they be unable to attend the event but require further information. A copy of the letter that was distributed is attached at Appendix 12.
- 6.4. At the consultation event on the 21 July, members of the project team were on hand to assist visitors and to answer any questions. A total of 26 response forms were received which were broadly supporting of the revitalisation of this part of Reading town centre and the provision of new housing (particularly affordable housing) for the Borough.
- 6.5. The exhibition display consisted of 11 A1 boards that guided visitors through the proposals, a copy of the boards are attached at Appendix 13. These included:
- i. Description of the site and extant consent;
 - ii. The proposal and the public benefits of the scheme;
 - iii. Plans and elevations of the proposed scheme;
 - iv. 3D images of the proposal;
 - v. Material schedules;
 - vi. Landscape proposals.
- 6.6. The feedback from the exhibition has helped to shape the final scheme as submitted which has responded as follows:
- Provision of policy compliant level of affordable housing onsite;
 - Reduction in height, scale and massing and further set backs at upper levels to improve appearance;
 - Improvements to Friar Street elevation to better reflect context and adjacent buildings.
- 6.7. The proposed scheme has fully considered the comments received during the community consultation period and now presents a scheme that is better suited to the locality and site context fully responding to all relevant consultation responses.

7. Proposed Scheme

Proposed Scheme Summary

- 7.1. The proposed scheme involves the demolition of the former arcade building that has been vacant and derelict for approximately 10 years and which provides no active contribution towards the character and vitality of Reading Town Centre.
- 7.2. The proposals then involve the redevelopment of the site to provide an eight storey building plus one level of basement. The proposed scheme consists of:
- 43 Residential units
 - 30% affordable housing on site
 - 4,212 sqm of B1 floorspace
 - 7 new retail units
 - 1 public house
- 7.3. The proposal will involve the retention and restoration of the existing Listed Buildings at 27 - 32 Market Place to provide a mix of commercial units across basement and ground floor level with residential units at upper floors. There will be an element of demolition to the rear of 29 – 31 Market Place and 32 Market Place however these are not considered to be original elements of the listed buildings.

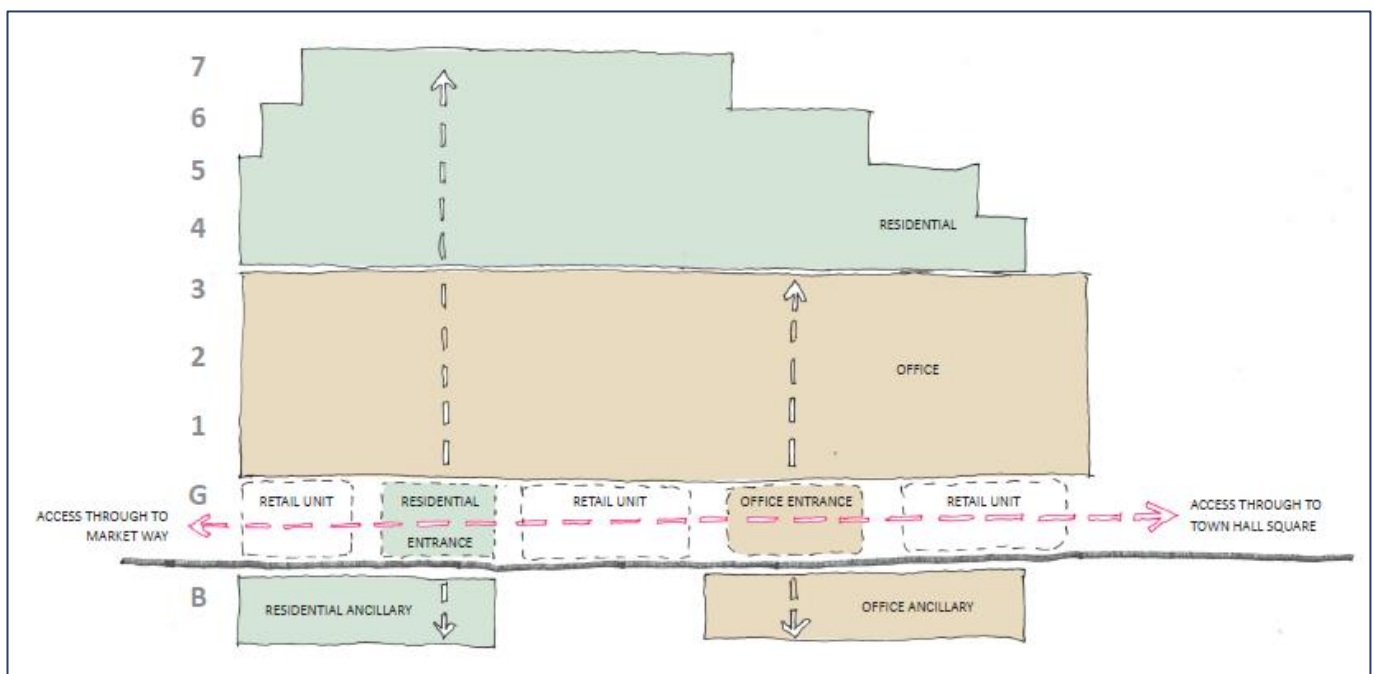


Figure 21 – Proposed uses

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Retail

- 7.4. The proposed scheme will re-provide 7 retail (Class A uses) at ground and basement floors within the scheme. Two of the retail units will be provided within the retained Listed Buildings fronting Market Place and a third unit will re-provide an A4 pub at 29 – 31 Market Place.
- 7.5. Five flexible retail units (A1/A2/A3) will be provided within the new Friar Street building. Unit 1 and Unit 2 will front Friar Street. Units 3, 4 and 5 will have entrances to the public walkway through the site.

Office

- 7.6. The proposed scheme will provide 4,212 sqm of flexible B1 office floorspace across three levels as a direct replacement of existing office floorspace. There will also be an overall uplift of B1 floorspace of approximately 2,408.8 sqm.

Residential

- 7.7. At first, second and third floor levels of the Listed Buildings fronting the Market Place, the scheme involves the conversion of the floorspace to provide 8 residential dwellings.
- 7.8. The remaining 35 residential units are provided within the new Friar Street building across fourth to seventh floor levels. The proposed units will be in the following mix:

	Unit type	No of units	% of the mix
Market units	City Suite (1B1P)	7	44
	1 Bed	12	
	2 Bed	9	21
	3 Bed	2	5
Affordable units	City Suite (1B1P)	5	19
	1 Bed	3	
	2 Bed	4	9
	3 Bed	1	2
Total		43	100

Affordable Housing

- 7.9. The proposed scheme involves the provision of 30% onsite affordable housing which equates to 13 units. The proposed tenure split within the affordable housing element will be 70% social rented and 30% low cost home ownership.
- 7.10. The affordable housing will be pepper potted across the site.

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Listed Buildings

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

Amenity

- 7.13. 13 of the residential units will have private amenity in the form of balconies or terraces. Owing to the need to preserve the special interest of the Listed Buildings within the site, the residential units at upper levels of these properties will not have access to any private amenity space.

Design

- 7.14. The new Friar Street building will be constructed from a light sandstone and mixed brick to reflect the character of the town centre in particular the appearance of the Church. The building will also have new shop fronts at street level fronting the public realm. The new building will be stepped from fourth to seventh floor level away from Friar Street and Market Place in a rough 'C' shape to reduce the building's massing and to orientate outlook and protect levels of amenity.
- 7.15. The proposed fenestration, particularly to Friar Street, has been developed in discussions with Historic England who are broadly supportive of the revised design.
- 7.16. Internally, the Friar Street building will be largely open plan for the B1 element to allow for flexible use of the space. The residential units will all be compliant with the National Space Standards.
- 7.17. There are no changes proposed to the external design of the listed building on Market Place other than the removal of 20th Century additions to the rear and the insertion of new windows to the rear at first, second and roof floor levels. Internally, various demolition works are proposed to enable the use of the properties for the uses proposed.

Energy and Sustainability

- 7.18. The proposed scheme will incorporate onsite renewable technologies to achieve a carbon reduction to meet the requirements of Part L of the Building Regulations for the new build element. The proposed scheme will also involve the installation of 18 PV Panels to the flat roof at eighth floor level to meet the on-site renewables requirements.
- 7.19. The Friar Street building will operate using communal boiler systems which will power the residential units and the offices. The uses proposed to the Market Place properties will have individual gas boilers to each unit.

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- 7.20. The redevelopment is also proposing to achieve BREEAM 'Excellent' for the new build retail and office elements and BREEAM 'Very Good' for the refurbishment of the Market Place properties.

Transport and Parking

- 7.21. The proposed scheme will be car free and each land use proposed will have dedicated cycle parking storage that meets and exceeds the Council's requirements.
- 7.22. Residential cycle parking will be provided at basement level of the Friar Street building in addition to separate office cycle parking. The cycle parking will be accessible by lifts to each uses (office & residential).
- 7.23. Retail cycle parking will be provided to the rear of Market Place for both visitor and staff provision. Secure residential cycle parking will also be provided to the rear of Market Place for the units at upper floors of 27 – 32 Market Place.

High Level Comparison with the Consented scheme

- Contemporary contextual design that is supported by Historic England.
- Additional residential units – 43 vs 14
- On-site affordable housing provision
- Uplift in B1 floorspace to 4,212 sqm
- Heritage benefits of refurbishment and re-use of listed buildings
- Retention of public access route through the site

8. Planning Policy Framework

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

Local Development Plan

- 8.2. For the purposes of the determination of this application, the Development Plan consists of:
- Reading's Core Strategy (adopted 2008, updated in 2015);
 - Reading's Sites and Detailed Policies (adopted 2012, updated in 2015);
 - Reading Central Area Action Plan (adopted 2009).
- 8.3. Consideration has also been given to the relevant adopted Supplementary Planning Documents including:
- Affordable Housing SPD (2013)
 - Employment, Skills and Training SPD (2003)
 - Revised Parking Standards and Design SPD (2011)
 - Planning Obligations under S106 SPD (2015)
 - Sustainable Design and Construction SPD (2011)
- 8.4. Consideration has also been given to the Council's Market Place & London Road Conservation Area Appraisal (2007).

National Planning Policy Framework

- 8.5. Consideration has also been given to National Planning Policy Framework (2012), which identifies that there should be a clear presumption in favour of sustainable development. The NPPF is a material consideration in the determination of planning applications.
- 8.6. Paragraph 17 of the NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes, businesses, infrastructure and thriving local places that the country needs. High quality design and a good standard of amenity for all existing and future occupants of land and buildings should be sought.
- 8.7. Paragraph 18 of the NPPF states that the Government is committed to securing economic growth in order to create jobs and prosperity. This paragraph also states that planning should operate to encourage and not act as an impediment to sustainable growth.
- 8.8. The NPPF at paragraph 50 states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

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- 8.9. Paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, water supply and demand considerations.
- 8.10. Paragraphs 131, 132, 134 and 135 of the NPPF sets out a presumption in favour of preserving and enhancing heritage assets including designated heritage assets. Where proposals lead to less than substantial harm to designated heritage assets, harm should be weighed against the public benefits of the proposal. In relation to non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 8.11. With regard to decision taking, the NPPF advises that local planning authorities should approach decision taking in a positive way to foster the delivery of sustainable development and should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development where possible (paras 186 and 187).

Reading Borough Council's New Local Plan

- 8.12. The Council are in the process of replacing their current Development Plan with a new Local Plan. The Council consulted on their Pre-Submission Draft Local Plan between the 30 November 2017 until the 26 January 2018. According to the Council's Local Development Scheme (2016), the expected adaptation date is January 2019.
- 8.13. As the Draft Local Plan has not been approved by Cabinet for Submission for Independent Examination, only limited weight can be given to the emerging policies within the New Local Plan. The document does however give a clear indication on the anticipated direction of travel for the Borough and the importance of Reading Town Centre to continue to provide a mix of residential and commercial floorspace.

9. Scheme Assessment

Summary

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

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

Benefits – Key Highlight Summary

- 9.2. The proposed scheme will deliver 43 new residential for Reading of which 30% will be affordable units. The scheme also presents an opportunity to provide new employment floorspace (office and retail) as well as re-providing a public house to Market Place. The scheme also presents heritage benefits the re-use of three listed buildings to Market Place and reinstating a historical public right of way.

Scheme Assessment

a) Demolition

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

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- 9.8. The demolition of the Friar Street building has been presented to officers throughout the pre-application discussions and in discussions with Historic England and Cllr Page. It has always been advised that its replacement should be weighed against the proposed exemplary design of the replacement façade which should enhance the character and appearance of the Conservation Area. The proposed replacement elevation has been designed to vastly improve the appearance of the site and is considered acceptable in this instance.
- 9.9. It is anticipated that a comprehensive Construction Management Plan and Logistics Plan will be required for the demolition of these parts of the site. It is also envisaged that this can be secured by a suitably worded condition or within the legal agreement.
- 9.10. Demolition has therefore been fully justified to enable the delivery of a range of benefits that will result from the redevelopment of the site (see Section 11 of this planning statement). The redevelopment of the site will also contribute to the vibrancy of Reading town centre on the basis that it has largely been agreed under the 2007 consent.

b) Archaeology

- 9.11. Core Strategy Policy CS33 seeks to protect the Council's Heritage Assets which includes areas of potential archaeological importance. The policy states that permission will only be granted where development has no adverse impacts on historic assets and their settings.
- 9.12. The archaeological background and potential of the development site was previously described in a previous desk-based assessment by RPS (2006) that was submitted in support of the previous 2007 consent. The 2006 report specifically addressed the land at 173 – 175 Friar Street where the majority of works was proposed however did not include the properties at Market Place as these did not form part of the application site.
- 9.13. The application site was found to be located outside the northern edge of the likely extent of the Saxon settlement at Reading which was focused around Bridge Street, St Marys Butts and St Mary's Church.
- 9.14. As such, a Desk Based Archaeological Assessment of the site has been again been undertaken by RPS which looks at the areas of detailed investigations to the rear of 173 – 175 Friar Street.
- 9.15. The 2007 decision notice included a condition (No. 5) which related to archaeology as follows:

"No development shall take place within the site until the applicant, or their agents or successors, in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority"

Reason: to ensure that such archaeological material and evidence of significance should be examined during this development and in the interest of protecting the archaeological heritage of the borough"

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- 9.16. In response to this condition, a Written Scheme of Investigation (WSI) was prepared and submitted in June 2007 and agreed by Berkshire Archaeology in June 2007. The WSI agreed two stages of archaeological fieldwork involving the targeted excavation locations and a watching brief during the intrusive ground works.
- 9.17. An updated WSI was subsequently prepared and submitted and agreed via email in January 2008. A later addendum to the updated WSI was prepared by Oxford Archaeology and submitted in May 2008 however was not formally approved.
- 9.18. Overall the programme of archaeological work identified several phases of activity at the site, starting in the late 11th Century which are outlined in para 3.12 of the submitted Archaeology Report.
- 9.19. As there have been no significant material changes to the site since the previous consent, the report outlines that the proposed archaeology strategy for the development will adhere to the ongoing Written Scheme of Investigation. The report notes that an updated WSI is likely to again be required upon the grant of any planning permission and this can be secured by planning condition.
- 9.20. Any further fieldwork or investigations would be undertaken by a suitably qualified archaeological expert in accordance with the appropriate standards and guidance.
- 9.21. The proposed scheme will not therefore have any adverse impacts on the archaeological importance of the site subject to suitably worded conditions as recommended in the previous consent and the submitted Archaeological Assessment. The proposed scheme is therefore in accordance with Core Strategy Policy CS33.

c) Land Use – Retail

- 9.22. Chapter 2 of the National Planning Policy Framework sets out the national approach to ensuring the vitality of town centres. Paragraph 23 of the NPPF advises that Local Planning Authorities should, recognise town centres as the heart of their community and pursue policies to support their viability and vitality. The same paragraph seeks to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential that is needed in town centres. The principles of paragraph 23 of the NPPF have been demonstrated by the LPA in their emerging Draft Local Plan Policy CR14d for the allocation of the site (see Appendix 2).
- 9.23. Paragraph 8.1 of the Council's Core Strategy sets out how Reading has been transformed into "*one of the leading retail centres in the UK*" which was cemented by the opening of The Oracle in 1999. The vision of the Core Strategy for retail seeks to expand the retail offer of the Borough across the plan period and specifically within the centre of Reading which will accommodate a wide range of retail, leisure and cultural uses. Reading is identified as a Regional Centre, being the top category in the Council's Hierarchy of Centres (Policy CS26). Reading will be the focus of major retail, leisure and culture development.
- 9.24. Core Strategy Policy CS25 requires major retail development to take place in, or as an extension to the centre of Reading. This promotion is principally due to the accessibility of town centre sites which means they are generally convenient for the majority of visitors.

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- 9.25. Core Strategy Policy CS26 promotes the importance to ensure the vitality and viability of town centres, particularly Reading being the Borough's only Regional Centre. Policy CS26 goes on to require development for main town centre uses in these centres, appropriate to the scale of the centre it is located in.
- 9.26. Core Strategy Policy CS27 seeks to maintain a strong retail character in the identified centres to retain the vitality and viability of these centres.
- 9.27. Paragraph 8.8 of the Core Strategy notes that there is a need for a maximum of 100,250 sqm of retail floorspace by 2016. Whilst the figure quoted in the Core Strategy is not a monitoring target it is recognised that the emerging Local Plan Policy RL2 indicates that future provision will be made for up to 34,900 sqm of retail in Reading demonstrating the commitment for continued retail growth in the town centre.
- 9.28. The proposed scheme will provide 1,602.9 sqm of retail floor space principally at ground floor level to both the Friar Street and the Market Place frontages. This level of new retail floorspace will assist in meeting Reading's existing and future targets in accordance with Policy CS27 and emerging Policy RL2.
- 9.29. The proposed scheme will introduce new retail floorspace in the following break down:

	Friar Street					Market Place		
	Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 6	Unit 7 (pub)	Unit 8
Basement	159	173	-	-	-	31.3	121.6	-
Ground	274.6	144.7	74	215	98	86.2	138.8	45.3
Total	433.6	317.7	74	215	98	117.5	260.4	45.3

Figure 22 – Schedule of Retail units

- 9.30. The larger of the retail units (units 1 and 2) are located on the primary retail frontage of Friar Street. These retail units are in a prime retail location and will facilitate a new active frontage in a location which has been 'dead' in frontage terms for almost a decade.
- 9.31. Reading AAP Policy RC10 sets out the requirements for development within designated frontages. The policy sets out that proposals at ground floor level should be in the following uses A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses unless it would be an entrance to upper floors.
- 9.32. It is noted that there is policy support for the retention of small shop units in areas characterised by small units where this involves the amalgamation of individual shop fronts, presumably aimed at the ability to combine units under permitted development rights. The policy goes on to require the provision of small shop units from major new retail development providing more than 2,500 sqm of floorspace. A small shop unit is defined as being less than 75 sqm.
- 9.33. The proposed scheme will provide 1,602 sqm of new retail floorspace and therefore falls outside part ii) of Reading AAP Policy RC11. Owing to the presence of the arcade Policy RC11 requires the retention of small units. The following sections demonstrate that the viability, town centre location and lack of street frontage results in the limited number of small units proposed, responding to market demand.

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- 9.34. Figure 22 shows that one retail unit below 75 sqm will be provided within the Friar Street building demonstrating the intention to provide a range of retail units consistent with the pre-application advice of January 2017 (page 2).
- 9.35. This part of Reading is highly commercial, it forms part of the main shopping offer of the town centre given its location in relation to important transport links, offices and the Town Hall. This commercial character attracts key retail occupiers including Marks and Spencer's, Tesco, Starbucks and in turn increases the market rental values for retail units. Recent retail space take up has headed towards more leisure / night time uses by chain companies within the vicinity of the site including The Botanist bar, Honest Burger and Pho restaurants.
- 9.36. Through the increase in rental values in Reading, the central areas become increasingly unviable for the provision of new smaller retail units as required by Policy RC11 and securing a long term occupation of smaller units in the core town centre.
- 9.37. As worded the Policy (RC10) does not allow for flexibility in developments to respond to changing market conditions. This flexibility would avoid levels of vacant units and ensure the sustainable growth and vitality of the retail centre of Reading by welcoming 'larger' (above 75 sqm) retail units.
- 9.38. The existing site has been largely vacant for a significant period of time despite various marketing attempts. The last occupier of an arcade unit vacated in January 2016 with the remaining units having been vacant for a significantly longer period (almost 10 years).
- 9.39. The former arcade units are no longer attractive to potential occupiers due to the size of the units, the dated accommodation that is provided when compared to the rental values required in this central Reading location and the alternative modern retail units that are available for similar prices.
- 9.40. A GOAD retail search map which has been undertaken for Reading town centre shows that there are various vacant units across the town centre, the application site being the biggest. To the north of Friar Street, lies Harris Arcade which also comprises several vacant units demonstrating the lack of demand for smaller units in the arcade arrangement as it does not give an occupier the street/frontage exposure that is often desired.
- 9.41. Savills' retail team have analysed the type of retail tenants that are currently looking for retail floorspace within Reading which is attached at Appendix 14. The research has confirmed that it is the larger brands (Brew Dog, Cycle Bar and MetroBank) actively looking for retail units typically require larger, modern retail floorspace (above 167 sqm, between 167 sqm and 325 sqm respectively) particularly in such a key location in order to make their occupancy viable. Even when looking at smaller operators such as Doc Martens (92 sqm), Inglot (232 sqm) and Revital (74 sqm) they typically require prime positions in town centres that front onto primary shopping frontages.
- 9.42. According to the Savills Retail team, the typical rental values that would be expected from the proposed retail units range between £10 per sqft and £30 per sqft with half rates anticipated for any basement floorspace. This is in comparison to the recent agreement for an A1/A3 use on King Street which was £40 per sqft owing to its prominent position within the town centre. Further, the location is considered to be 'secondary' for retailers being located internally within the site and not on the primary frontage of Friar Street.

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- 9.43. The scheme as submitted therefore provides a variety of small and large retail units. Agents have advised that this is a viable combination of units.
- 9.44. Other active companies looking within Reading are D2 Gyms, however again they typically require larger units to meet their business models and make their operation viable.
- 9.45. It is also noted from the Council's own retail study (Retail and Commercial Leisure Assessment, 2017) used in support of the emerging Local Plan, that owing to recent changes in people's shopping behaviours, there is a stronger reliance on internet shopping. The Council's report identifies that retailers are now focusing their growth programmes around the UK on having a flagship store in strategic locations with smaller stores in satellite locations. This supports the principle of providing larger retail floorplates in key town centres where they are more likely to be sustainable for long term occupation.
- 9.46. Notwithstanding the above, the proposed scheme re-provides one small unit (unit 3) at ground floor level which will be in flexible A1/A2/A3 use. A full breakdown of the proposed retail unit sizes is provided in Figure 22 which demonstrates that units 5, 6 and 8 will also provide smaller units of circa 100 sqm of floorspace. The best possible contribution towards smaller units has been proposed based on the viability of the scheme with the smaller units being connected to the other uses within the building (B1 / C3). These unit should also be counted in support of promoting small retail units at the site.
- 9.47. The re-provision of retail units will therefore meet Reading AAP Policy RC11 to support the continued vitality and vibrancy of Reading Town Centre.

d) Land Use – Offices

- 9.48. Section 1 of the National Planning Policy Framework sets out the Government's policies for delivering a strong, competitive economy. Paragraph 19 of the NPPF states that, "*planning should operate to encourage and not act as an impediment to sustainable growth*". This is developed further in paragraph 20 which encourages LPAs to plan to meet the needs of businesses and support a 21st century economy.
- 9.49. Paragraph 21 of the NPPF goes on to ensure that a flexible approach is taken to allow for rapid responses in economic circumstances.
- 9.50. Core Strategy Policy CS10 directs major office development to the core centre of Reading and along the A33 corridor. The supporting text for this policy highlights that office development which attracts high levels of trips should be in highly accessible locations (para 5.8). The application site has been identified as being a highly accessible location within the town centre of Reading. The principle of office development in this location is therefore considered to be acceptable.
- 9.51. It should also be noted that as part of the Council's emerging Local Plan, the site has been put forward for a mix of uses including office floorspace (emerging Policy CR14d). It is therefore considered that there is 'in principle' support for the provision of offices in this part of Reading.
- 9.52. Core Strategy Policy CS11 sets out the Council's requirements to maintain a range of types and sizes for commercial premises across the Borough. The policy goes onto state that proposals that would result in a net loss of employment floorspace would not be permitted.

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- 9.53. The existing Friar Street building provides approximately 1,803.2 sqm of B1 office floorspace although it has been vacant for a significant period of time. Previous iterations of the scheme would have seen the loss of B1 office floorspace on the site with the complete change of use to residential floorspace. Officers did not contest this loss of employment floorspace in stating, *“it is considered that a case can be made which will enable officers to possible support the loss of the existing office use of the building”* (pg 2 of pre-application response dated 07 January 2016).
- 9.54. Although there was no ‘in principle’ objection to this loss on the basis of the vacancy period through the pre-application discussions, it was considered that the retention of an element of employment floorspace within the proposed scheme would enhance its contribution to Reading and the site itself through the creation of new jobs. The proposed scheme therefore complies with Policy CS11.
- 9.55. The proposed scheme will introduce 4,212 sqm of flexible office floorspace within this key part of Reading Town Centre to boost the employment generation of this site. The office floorspace can be let as a whole but equally can be sub-divided to create smaller lettable units to meet the requirements of Core Strategy Policy CS12.
- 9.56. It is recognised that Core Strategy Policy CS13 requires employment development to provide mitigation measures for the increased demand for housing resulting from the influx of new employees to an area. It was discussed and agreed during the January 2018 pre-application discussions that the Council would not be seeking additional contributions towards housing or affordable housing as a result of the development proposals. As the scheme is providing policy compliant affordable housing on site, this was considered appropriate by officers to satisfy the requirements of Policy CS13 which is typically applied in relation to entirely non-residential schemes.
- 9.57. It is noted that Policy CS13 also deals with mitigation measures in relation to labour and skills and impacts to the transport network. The Council have a general requirement to secure local employment, skills and training throughout the construction phases of the development. It is envisaged that this will form part of the s106 package upon the grant of any planning permission.
- 9.58. In summary, the proposed scheme will provide an uplift in the level of office floorspace at the site. This will provide further employment opportunities for central Reading and be attractive for flexible future office tenants. The proposed scheme is therefore considered to be wholly compliant with Core Strategy Policies CS10, CS11 and CS12.

e) Land Use – Residential

- 9.59. The National Planning Policy Framework makes it clear that housing development should be considered with a presumption in favour of sustainable development (para 49). The need for new residential development in appropriate locations is a clear message throughout national planning guidance and reinforced by the publication of the Housing White Paper in February 2017 and the later Government Consultation on the OAN Methodology in September 2017.
- 9.60. The Council have identified that the majority of development will be directed to the built up areas of the Borough and those sites specifically allocated within the Development Plan. Paragraph 6.9 of the Core Strategy is explicit in that future residential development should be:
- Located in areas of high accessibility;
 - Directed to areas in most need of regeneration; and
 - Accessed by efficient and effective public transport.
- 9.61. The existing site is located in the Core of Reading town centre and therefore benefits from being highly accessible by all modes of transport. The site is highly accessible by numerous methods of public transport as set out in the submitted Transport Statement. The site is also largely derelict having been vacant for a period of approximately 10 years. Given its prominent location within the town centre on two of the primary streets in Reading, its vacancy removes its contribution towards the vibrancy and vitality of the town centre. The site would most definitely benefit from the regeneration proposed. The site is therefore suitable for residential development in this respect and in accordance with Paragraph 6.9 of the Core Strategy.
- 9.62. Core Strategy Policy CS14 sets out that provision will be made for 521 dwellings over the plan period between 2016 – 2026 although could increase to 671 dwellings per annum under the emerging policy H1. Supporting draft text to emerging Policy H1, paragraph 4.4.5 states that,
- “Delivering the level of housing set out in Policy H1 will mean that there is a shortfall of 943 dwellings when considered against Reading’s need”*
- 9.63. The Council’s latest Annual Monitoring Report (2016 – 2017) states that there was a low level of housing delivery which was due to very low levels of delivery in the town centres (para 7.2).
- 9.64. The proposed site is in the accessible location of Reading where the principle of housing has already been considered acceptable through the approval of 14 residential units in 2007 (ref: 061033) therefore the principle of residential should again be considered appropriate as there have been no material changes to the site or policy that would make this unacceptable.

- 9.65. As part of the Council's consultation on their new Local Plan, the applicant submitted representations on the application site for its allocation within the emerging Local Plan. According to the latest consultation document (Draft Pre-Submission Local Plan 2017), the application site has been put forward for a mixed-use allocation to include retail, offices and/ or between 36 - 54 residential units across the site (173-175 Friar Street and 27 – 32 Market Place ref: CR14d – See Appendix 2). On this basis, it can be considered that the principle of residential in this location would be considered acceptable consistent with previous advice given during the pre-application discussions.
- 9.66. The proposed scheme will see the introduction of 43 residential units in a mix of sizes and tenures (see part q) paras 2.06 of this statement). The provision of 43 units within the scheme complies with the emerging site allocation and will assist in achieving the Council's annual housing targets.
- 9.67. The proposed scheme will involve the conversion of the upper floors of the Listed Buildings fronting Market Place. This has been a consistent element of the scheme since the first pre-application in January 2016 and has been presented to planning officers over the course of the pre-application discussions. No objections were raised by officers or Historic England to the change of use to residential floorspace at upper floors of these properties.
- 9.68. It should also be highlighted that there have been previous approvals for the change of use of the upper floors of the properties on Market Place. Most notably is the 2013 permission at No. 32 where the change of use from office to residential was granted (ref: 120532). Sleeping accommodation has also previously been considered acceptable at No. 27 – 32 Market Place to create a hotel (C1 use) and it is considered this established the site being acceptable for sensitive uses similar to C3.
- 9.69. The proposed scheme is therefore in full compliance with the principles of the NPPF, Adopted Policy CS14 and the direction of travel of the emerging Local Plan to deliver additional dwellings to assist in meeting the Council's housing targets.

f) Land Use – Affordable Housing

- 9.70. Section 6 of the National Planning Policy Framework requires the delivery of a wide choice of high quality homes. Paragraph 50 of the NPPF requires LPAs to plan for a mix of housing including affordable housing with a drive for such provision to be on site unless it can be justified that off-site provision or a financial contribution would be an equivalent or better option.
- 9.71. Core Strategy Policy CS3 sets out that major schemes should set out how they include measures to enhance social inclusions and promote diversity. Core Strategy Policy CS16 seeks a target provision of 30% affordable housing on sites providing 15 or more dwellings with adopted Policy DM6 and the Council's Affordable Housing SPD requiring affordable housing on sites subject to the assessment of viability.
- 9.72. Throughout the pre-application discussions with officers and local councillors, the provision of affordable housing has consistently been an important requirement of any regeneration proposal for the site. This was also reflected in the responses received from the Community Consultation exercise.

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9.73. Initially the proposed scheme was not seeking to provide any on site affordable housing and a viability assessment was prepared as part of the pre-application discussions to justify this position. Officers subsequently advised within their written response dated 19 July (page 6) that,

“the Council would seek on site provision with the following mix:

- *30% of the units on site, with an equal spread across the different sized flats within the development;*
- *The affordable contribution to be at least 70% social rented, with the remaining 30% being low cost home ownership.*

You are strongly advised to further review the emerging scheme, with view to providing the required on-site affordable housing provision”

9.74. On this basis, the proposed scheme has been revisited and will provide 13 affordable residential units which equates to an on site provision of 30%. The affordable units will be split as required by officers to fully meet the requirements of affordable housing in being 70% social rented and 30% low-cost home ownership. The affordable units have been allocated as follows:

	Affordable Units No.	Unit Type	Unit Size (sqm)
Friar Street	2	City Suite (1B1P)	47.1
	3	1B2P	51.5
	7	2B4P	76.4
	9	City Suite (1B1P)	42.9
	11	City Suite (1B1P)	42.6
	13	1B2P	54.9
	15	City Suite (1B1P)	47.1
	18	2B3P	68.2
	21	1B2P	51.5
	25	3B4P	74.4
Market Place	28	2B3P	62.7
	38	1B2P	56.3
	41	2B4P	83.4
Total	13 Affordable Units		

9.75. The proposed scheme will therefore meet the target set in Policy CS16 and the level of provision is compliant with the requirements set by the Council and ward Councillors.

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- 9.76. The proposed affordable units will be pepper potted across the development in a mix of shared ownership and social rent which has been advised by officers. The scheme will still retain one core for all floors to ensure that the units will fully integrate within the scheme which was requested within the Council's written responses.
- 9.77. As advised by officers, the applicant has made contact (phone and email) with all Registered Providers (RPs) on the Council's approved RP list in October 2017 and January 2018. In October 2017, the applicant received only one response from Housing Solutions who expressed an interest in the site which had a lower level of affordable housing on site than currently proposed.
- 9.78. The scheme has subsequently been revised in line with the January 2018 pre-application discussions and again phone and email contact was attempted with the Council's approved RPs for potential interest in the proposed 13 affordable units in the required tenure split. At the time of writing the following responses have been received from the RPs:

Registered Provider	Date Contacted	Response	Date Response Received
Catalyst Housing Group	31 January 2018	Minimum size required of 50 units	31 January 2018
Home Group	31 January 2018	Affordable Housing offer too small to manage	01 February 2018
Radian Housing Group	31 January 2018	None	None
Stonewater HA	31 January 2018	None	None
Sovereign HA	31 January 2018	No interest in proposed affordable offer	19 February 2018
Thames Valley HA	31 January 2018	None	None
Housing Solutions	24 January 2018	Concentrating on the Maidenhead area but think the scheme would have been attractive	01 February 2018

- 9.79. As evidence above, contact has been attempted with all the Council's recommended Registered Providers, details of which can be provided under separate confidential cover if required. To date, only one RP considered that the scheme would be one which they would be interested in managing however the company was currently concentrating their efforts in the Maidenhead area. Notwithstanding this, the confirmation received by Housing Solutions demonstrates that the scheme would be manageable and is considered to be sufficient to demonstrate a viable and attractive scheme in accordance with Policy CS16.
- 9.80. We were also advised by Housing Solutions that the Council are considering setting up their own affordable housing body. We would welcome any discussions with the relevant Council department in relation to the scheme should this be on their agenda.

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9.81. The proposed scheme is therefore considered to fully comply with the provisions of the Council's Policies CS3, CS16, DM6 and the Affordable Housing SPD. The proposals have successfully responded to the comments received by officers, Councillors and the local residents to provide a range of tenures in Reading town centre and is therefore policy compliant.

g) Land Use – Housing Mix

9.82. Adopted policy DM5 sets out the housing mix requires for the Borough. The policy states that for sites outside the central areas there will be a requirement for at least 50% three bedroom dwellings and indicates that the greatest need over the plan period is likely to be for three or more bedrooms.

9.83. As the site is located within a designated Town Centre this strict policy requirement for three bedroom dwellings does not apply in this instance. Reading AAP Policy RC9 does however apply which requires residential development within the central area should contribute towards a mix of different sized units in roughly the following mix:

Unit Type	Minimum Percentage of Mix (%)
1 bed	40
2 bed	55
3 bed	5

9.84. The proposed scheme will provide 43 residential units in the following mix:

Unit size	No of units	Percentage of mix (%)
City Suite (1B1P)	12	63
1 Bedroom	15	
2 Bedroom	13	30
3 Bedroom	3	7
Total	43	100

9.85. Policy RC9 requires a maximum of 40% 1 bed units and a minimum of 5% 3 bed units for development in Reading. The proposed scheme provides a higher level of 1 and 3 bedrooms as this is seen as the primary types of dwellings that will be required in Reading town centre. This has also been identified in the Berkshire Strategic Housing Needs Assessment and stated explicitly in paragraph 5.1.5 and 5.1.6 of the Sites and Detailed Policies Document. The proposed scheme would therefore meet an identified need of the Borough.

9.86. This is further confirmed in para 5.1.8 of the Council's Sites and Detailed Policies Document, which highlights that, "*The exceptions to the policy on size and type are in defined centres*" demonstrating a greater level of flexibility that should be applied to city centre development.

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- 9.87. The higher percentage of 1 bed units is also reflective of the accessible location of the site within the centre of Reading. The level of 1 bed units in the scheme generates revenue that improves the viability and allows the site to bring forward a policy compliant level of affordable housing. The proposal works both in economic and social terms. A supporting statement from Savills has been prepared which addresses the proposed unit mix in viability terms, and is submitted as part of this application.
- 9.88. Nonetheless the scheme does provide 7% 3 bed units which is sufficiently above the minimum standards required by Policy RC9. The provision of a greater amount of family sized dwellings is also seen as a social benefit of the scheme as this will not only meet the perceived need set out in the Housing Need Assessment but will also encourage families to the site providing improved opportunities for all and enhances the development of a new community in this part of the town centre.
- 9.89. The application is considered to provide a suitable range of unit sizes that is reflective of its position within Reading town centre and therefore meets the requirements of Reading AAP Policy RC9.

h) Land Use – Density

- 9.90. Para 3.12 of the Council's Core Strategy notes that the core Centre of Reading will typically be of high density, mixed use schemes. Policy CS4 of the Core Strategy goes on to state that the scale and density of developments will be related to the accessibility of the site.
- 9.91. Core Strategy Policy CS15 permits the following density standards for town centre locations:

Location	Density (dwellings per ha)
Town Centre	Above 70

- 9.92. The application site lies within a highly accessible town centre location with excellent access to several methods of public transport. It is therefore anticipated that this location would be considered appropriate for a higher density level above 70 dwellings per ha in accordance with Policy CS15.
- 9.93. The scheme has materially evolved since the commencement of pre-application discussions to re-provide office floorspace and reduce the level of residential units proposed. Previously the scheme sought advice on 67 residential units however has now reduced the scheme to 43 residential units which again has been considered as appropriate proposals at the site.
- 9.94. The site measures approximately 0.2 ha and will provide 43 dwellings in total. This equates to a density of 215 dwellings per hectare which is above 70 dwellings per ha in accordance with Policy CS15.
- 9.95. This has been further reinforced by the Council's emerging site allocation for the site which identifies the site as being capable of providing between 36 – 54 new residential units. As the scheme provides a level of housing that is directly in the middle of the emerging allocation, it is considered that the proposed scheme provides a residential density that will be compliant with Policy CS4. The proposed development makes efficient use of the site whilst allowing a mixed use development to come forward.

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i) Land Use – Public House

- 9.96. Core Strategy Policy CS31 sets out that proposals which provide new, extended or improved community facilities will be supported. These facilities should be located in accessible, and central, areas. The policy goes on to highlight that the redevelopment of community facilities away from such a use will not be supported unless it can be demonstrated that there is no longer a need for that facility.
- 9.97. Adopted Policy DM15 echoes the Council's protection of leisure facilities and public houses.
- 9.98. Reading AAP Policy RC8 seeks a range of complementary evening and night time uses providing they do not have an adverse impact on amenity or the character and/or function of the central area. The policy goes on to advise that the location of drinking establishments will be refined to the Central Core.
- 9.99. Currently, the site comprises of a vacant public house at no. 29-31 Market Place, formerly known as The Cooper's Arms. The public house has been vacant for in excess of 10 years when the previous tenant vacated and currently provides no active contribution to the existing leisure or community facilities within the Town Centre.
- 9.100. The proposed scheme will bring back in to active use 260.4 sqm of A4 floorspace at 29-31 Market Place across basement and ground floor levels. The main entrance for the public house will remain from Market Place with the ground floor being the primary sales and seating area. The basement floor will provide ancillary kitchen, store and toilet facilities.
- 9.101. Upon review of similar uses in the vicinity of the site it is noted that the typical opening hours in Reading town centre vary from tenant to tenant. Largely public houses tend to be open until 11pm during the week and midnight at weekends as follows:

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

- 9.102. Our research shows that there is a strong night time economy in Reading town centre with pubs staying open late into the evening. The proposed public house to be re-provided at Market Place would improve the leisure activity in this part of the town centre. Through proposing operational hours, similar to those that already exist in Reading Town Centre, the proposed A4 use will coexist well with existing and proposed residential uses as this is already an established feature of this part of the core.
- 9.103. The pub unit will also be fitted out to comply with Part E of the Building Regulations, subject to any heritage constraints, to ensure that future residents are not impacted by noise or noise transfer from the A4 unit.

- 9.104. On the basis that there is no loss of a public house, and the scheme will bring back in to use an attractive A4 unit that will operate well alongside the existing and proposed residential uses, the proposed scheme will fully comply with the objectives of policies CS31, DM15 and RC8.

j) Land use – Loss of Health Club

- 9.105. Adopted Policy DM15 sets out the Council's protection of leisure facilities and public houses. The Council's pre-application response dated 24 January 2016 notes that justification for the loss of the health club approved under permission 061033 should be provided.
- 9.106. As set out in our previous pre-application submissions, building work was commenced in 2007 to implement permission 061033 however was halted in 2008. The works undertaken at the site were not completed and there has been no use of the site as a health club which was confirmed by the February 2016 pre-application written response.
- 9.107. On this basis and in practice, given that there was no use of the site as a leisure facility, there is not considered to be any 'loss' of such a facility. Even if there were an issue on the loss the benefits that the redevelopment of the site will generate would outweigh that loss. In this part of Reading there is greater need for retail, office and residential floorspace rather than D1 floorspace which has been confirmed through pre-application discussions.
- 9.108. It should also be highlighted that as part of the emerging Draft Local Plan, the site has been put forward for allocation for mixed use redevelopment including offices, retail and residential. The emerging allocation does not involve any D1 uses and therefore the principle of its loss should be considered acceptable on this basis.
- 9.109. The proposed scheme is therefore considered to be in full accordance with Development Management Policy DM15.

k) Design – Townscape and massing

- 9.110. The proposed scale, massing and bulk has been discussed extensively throughout the pre-application discussions with officers and Councillors. Officers concerns have previously surrounded the proposed bulk at sixth and seventh floor levels opposed to the overall height.
- 9.111. The submitted Design and Access Statement includes massing comparison images (pages 38 – 40) that clearly demonstrate the areas of the building that have been cut back when compared to the consented scheme and the previously discussed schemes. The resultant is that the overall massing of the building will be less prominent in views of the site and owing to its stepped design will appear less prominent particularly from street level.

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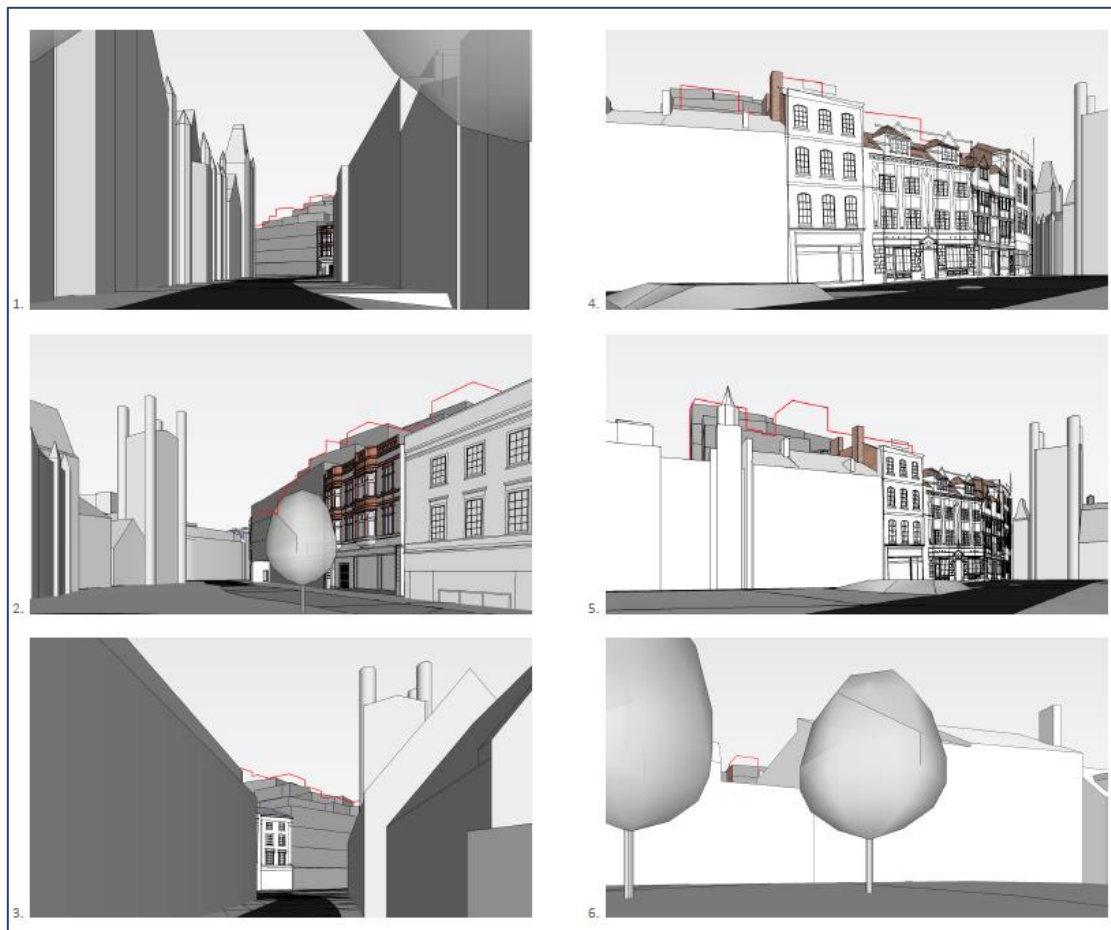


Figure 23 – Massing comparisons

- 9.112. Previous discussions with Councillors have been largely positive in relation to both height and scale / mass / bulk. Their primary concerns related to securing 30% affordable housing on site and a high quality design to Friar Street. In order to achieve this level of onsite affordable housing provision, the building has been designed as proposed. The scale of the building has also been reduced since the previous pre-application design iterations and the consented scheme as a result of the office use replacing previous residential uses at the lower levels in a viable arrangement. The massing will also ensure that the most viable scheme is presented through the inclusion of offices and residential uses.
- 9.113. Given that the 2007 consent did not include any affordable housing on site, it is considered that this scheme now presents a significant public benefit in line with national and local policies, that outweighs any perceived harm from the proposed scale of development, particularly at upper floors where the residential floorspace is proposed.
- 9.114. To this end, the proposed scheme has been extensively tested in relation to townscape impacts and views. The supporting D&A provides initial test views of the proposed development and a visual impact assessment.
- 9.115. Most notably, the written response from Historic England (April 2017) states that,

“we do not view the increase in bulk as particularly harmful to the significance of the conservation area and surrounding listed buildings. The partially implemented scheme would undoubtedly be highly visible in views from these buildings and from within the conservation area. The revised massing, while larger, would have a very similar impact on key views”

- 9.116. It should be noted that since Historic England’s response the scheme has been further cut back and improved.
- 9.117. Another key benefit of the scheme is the high standard of design proposed, particularly to the Friar Street frontage where an improved elevation is proposed. The proposed elevation will take references from the adjacent buildings as well as the surrounding townscape to ensure that it fully integrates within the streetscene. A full analysis of the Friar Street elevation is given within the Heritage Statement and the Design and Access Statement and this has been broadly supported by Historic England.
- 9.118. On the basis that Historic England and local Councillors have been broadly positive towards the proposed massing, scale and bulk paired together with the significant public benefits in both heritage and social terms that fully justify the proposed scheme.

I) Design – Height & Views

- 9.119. Reading AAP Policy RC13 sets out that tall buildings are defined as being either 10 floors of commercial floorspace or 12 storeys of residential floorspace. As the proposed scheme will involve the creation of an 8 storey building, it is not considered that the development will be classed as a ‘tall building’ under Policy RC13. This was confirmed by officers during the January 2018 pre-application discussions.
- 9.120. Notwithstanding the above, it is recognised that the building will be taller than its immediate neighbours and therefore due consideration to its impact has been given to the character and appearance of the area. The proposed building will act as an important building within Reading town centre, improving way finding routes across the town centre and key retail streets to reinstate its contribution to Reading and the Conservation Area.
- 9.121. The proposed height does not exceed the previously consented scheme which would arguably have been more prominent in the streetscene being dominated by 3 separate 8 storey towers. The towers would sit behind the Listed Buildings, being highly visible from Market Place and from Town Hall Square. It is considered that these towers would have a cumulative adverse impact on St Laurence Church and the Town Hall itself as well as other historic buildings in the surrounding area.
- 9.122. As part of the consented scheme, officers noted in their Committee Report that,
- “The additional stories above would be set well back from the front face this part of the building. They would be visible when standing in front and there would be an adequate physical separation of the differing architectural styles in the scheme” (page 10).*

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- 9.123. The scheme as submitted has been reduced by two stories from the scheme originally presented in 2016 to further preserve key views around the site. Pages 38 and 40 of the Design and Access Statement demonstrate the reduction in height that has been achieved when compared to the originally proposed scheme. The comparison images show that there have been significant cut backs made to the overall height and scale of the building to sit better within the townscape and relate better to the 2007 scheme.
- 9.124. Consistent with the previous iterations of the scheme, the main height of the building will sit back within the site, closest to M&S and stepped back from the Friar Street frontage. This will assist in minimising the height of the building when viewed from street level on Friar Street and Market Place which has been supported by Historic England.
- 9.125. A series of views have been agreed with the Council during the pre-application discussions which are considered to be of most importance and reflect views that were previously considered in 2007. CGI images have been prepared by Hayes Davidson to show the proposed scheme within each of the agreed views (see Design & Access Statement).
- 9.126. View 01 is looking towards the site from the corner of Friar Street and Blagrove Street. The view incorporates the Church to the left, the building to the middle and 172 Friar Street to the right. Town Hall Square and the statue of Queen Victoria are seen in the foreground.



Figure 24 – View 01

- 9.127. View 02 is looking towards St Laurence Church on Market Place with the properties at 27 – 32 Market Place also visible. The view shows the entrance to Market Way which is marked with a clock tower. The only visible elements of the proposed Friar Street building is seen to the left of the clock tower owing to its stepped design which falls away to the right of the clock tower leaving large levels of visible sky.

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Figure 25 – View 02

9.128. View 03 is looking towards the site on The Forbury. The view shows buildings on the left of the street and the Church on the right of the street. The view shows the view towards the new Friar Street building which is seen as a modern attractive addition to the view. This view also shows the arrangement of the upper floors which sit back within the plot. When compared to the same view of the consented scheme, it is clear that the visible mass has significantly reduced to provide an overall improvement to the view (page 47 of the Design and Access Statement).



Figure 26 – View 03

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- 9.129. View 04 is a long view of the site down Blagrove Street which incorporates the Town Hall to the left and a mix of buildings on the right hand side of the street. The view demonstrates that the Town Hall is prominent feature within the streetscene and the proposed development will create no competition between the two. The Friar Street building, owing to its orientation and stepped arrangement at upper levels will retain a large 'gap' between the site and the Town Hall to ensure that large levels of sky are visible further reducing the competition between the two buildings.



Figure 27 – View 04

- 9.130. The proposal would therefore have a reduced impact to that which has previously been considered acceptable in the existing context to preserve the character and appearance of the Conservation Area.
- 9.131. Again the proposed scheme will be set back from the main facades and only visible in limited views. These views have been fully analysed by the architects as agreed with officers. The views clearly show that the development would be in keeping with the character and scale of the surrounding area.
- 9.132. On this basis that all key views will be protected the proposed height of 8 stories is considered to entirely appropriate for the town centre location and therefore compliant with Policy RC13.

m) Design – External elevations (Friar Street building)

- 9.133. Chapter 7 of the National Planning Policy Framework states that the Government attaches great weight to good design (paragraph 56). Paragraph 60 of the NPPF goes on to state that, “*planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or development forms or styles*”.

- 9.134. Core Strategy Policy CS7 states that all development must be of a high design quality that “*maintains and enhances the character and appearance of the area of Reading in which it is located*”. The same policy sets out the criteria that development will be assessed against including layout, density and architectural detail.
- 9.135. Developments will also be assessed to ensure that they have responded well to the local context and create or reinforce local character and distinctiveness.
- 9.136. Reading AAP Policy RC5 sets out the development within the central area should demonstrate that 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 areas local to the development site. Policy RC5 goes on to state the development should build upon the grid layout structure and providing continuity throughout the town centre.
- 9.137. The application site lies in central Reading, where there is a variety of design approaches. This was confirmed during the pre-application discussions where no examples of good architecture in Reading were put forward by officers. There is a theme, particularly within the core of Reading town centre that features historical architecture that has likely survived bomb damage mixed in with more contemporary additions that make up the character of the Conservation Area and the wider town centre.
- 9.138. Certainly on Friar Street, the Heritage Report advises that the area surrounding the site was subject to extensive bomb damage that impacted the Town Hall and St Laurence Church and properties on Market Place. As such, large areas of the town centre feature more modern post war designs, which evidenced by the application site itself.
- 9.139. The proposed scheme has been the subject of two years’ worth of pre-application discussions with local planning officers, ward councillors and Historic England. The design was originally proposed using red brick for the entire new build element to effectively replace the appearance of the existing building at no 173 – 175 Friar Street (see figure 38). This approach was described by Historic England as being unsuitable for this location as follows and light colours were recommended in the Council’s written response dated 24 May 2017, “*a full historicist approach would be inadvisable, given this forms but a part of a much larger and obviously modern development, a contemporary design which picks up on the formality, strong rhythm and fine detailing of the best of the surrounding townscape is needed*”
- 9.140. It has also been advised through the pre-application discussions with officers to avoid a ‘pastiche’ approach. It was however recommended to take references from the surrounding streetscene to achieve integration on this key frontage. Officers also did not wish to seek an uncontextual contemporary approach in this location to avoid any competition of views between the site and the Town Hall or the Grade I Listed Church. Officers have also previously recommended in the written responses received, despite the most recent comments from officers in January 2018, that the building should be read as one so that there is no difference in appearance (pre-app responses 19 July 2017 – page 4 & Historic England Response 03 April 2017 page 2) which has been achieved by the scheme as submitted.
- 9.141. The external design has therefore been proposed to take reference from the neighbouring properties, most notably the sandstone and flint colours of the Church opposite. Detailed banding, representing corning, has been proposed at parapet level of the Friar Street elevation to take specific reference from No. 172 Friar Street which has seen as a positive response by officers at the meeting on the 29 January 2018.

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- 9.142. The elevation will also provide mixed brick detailing to the fenestration of the building to take direct references from St Laurence Church. By varying the extent of brick at each upper floor this will ensure there is a hierarchy to the window arrangement as one moves up the building.
- 9.143. It has also been advised by Historic England during pre-application discussions that there is a preference for the frontage to be read as two separate volumes. This was recommended during the discussions held in May 2017. The scheme as submitted achieves this by stepping the elevation forward slightly to No. 175 Friar Street. This will add emphasis and draw attention to this element of the elevation to ensure that it retains its hierarchy over the elevations to No 173-174 Friar Street.
- 9.144. The fenestration arrangement has also been given extra attention to enhance the separation between the two volumes with thinner windows proposed to No. 175. The fenestration also features a strong and clear void to solid ratio to reinforce the 'grid' arrangement that is typically of this part of Reading as noted in Reading APP Policy RC5.
- 9.145. The remainder of the external elevations to the Friar Street building will utilise the same material in order for the building to be read as one. The building will be similar between floors G – 3 where the floorplates are fairly rectangular. From fourth floor and above, the elevations shift in that the floorplates become smaller to step the building inwards. The building becomes a rough 'C' shape and forms an interesting arrangement in elevational terms.



Figure 28 – Contextualising the front façade

- 9.146. Similar to the 2007 consented scheme, the upper levels of the Friar Street building did not match the lower floors and formed an visually interesting massing form in an almost zig-zag arrangement (see Figures 11, 12, 13 and 14).
- 9.147. On this basis, the proposed scheme is considered to provide a visually attractive external design that takes significant reference from the surrounding vernacular through use of detailed architectural features and suitable materials.

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9.148. The proposed Friar Street building will create a sense of place with a unique and tailored character that positively responds to the local context. The proposed external design to this part of the site is considered to fully comply with Policy CS7.

n) Design – External elevations (Listed Buildings)

9.149. Adopted Core Strategy Policy CS33 sets out that the Council will protect and enhance the Borough's historic environment. This is echoed in section 9.1 of the Council's Sites and Detailed Policies document which highlights the importance of the various heritage assets.

9.150. Emerging Policy EN1 follows the adopted approach and expects proposed development to protect and enhance the significant of heritage assets.

9.151. No changes are proposed to the front elevations of 27 – 28 or 32 Market Place other than general repair and refurbishment works in order to preserve the special interest and principal elevations of these properties. Consent is sought to remove the existing architrave pediment and fanlight to the main entrance of the front elevation of 29 – 31 Market Place. The proposed alteration would reinstate the front elevation closer to its historic appearance and this represents an enhancement that will better reveal its significance.

9.152. To the rear, there are changes proposed to the elevations of the listed buildings. The main proposed change will be the demolition of the 20th Century additions to the properties. The proposed removal of these elements have raised no objections from the Council or Historic England during the pre-application discussions. The demolition of these elements will open up the rear of these buildings to reinstate their original appearance, providing a heritage benefit in this regard.

9.153. Also to the rear, new windows and doors will be installed to the rear elevations of Nos. 27-28 Market Place and there will be a reinstatement of existing openings. These windows / openings have been proposed in discussion with our Heritage Consultants to ensure that there is minimal impact on historic fabric and where possible the reinstatement of existing openings.

9.154. Four roof lights will also be installed to No. 32 Market Place in order to enhance the daylight and sunlight levels to unit 43. Again the rooflights have been proposed alongside consultants Turley to ensure that they preserve the appearance of the property. The rooflights will be Conservation style to minimise their appearance however there will be no views of these rooflights from the public realm.

9.155. The proposed external elevations of the Market Place properties have been carefully considered as part of the submitted scheme to ensure that the special interest and principal historic fabric is preserved in accordance with adopted policy CS33.

o) Design – Heritage

9.156. Adopted Core Strategy Policy CS33 sets out that the Council will protect and enhance the Borough's historic environment. This is echoed in section 9.1 of the Council's Sites and Detailed Policies document which highlights the importance of the various heritage assets.

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- 9.157. Emerging Policy EN1 follows the adopted approach and expects proposed development to protect and enhance the significant of heritage assets.
- 9.158. This application is supported by a comprehensive Heritage Statement, prepared by Turley. The report follows detailed discussions with both the Council and Historic England across a two year period. There are four elements of heritage considerations that have been assessed, impact on the Conservation Area, impacts on nearby Listed Buildings, impacts on the Listed Buildings at Market Place and replacement of a building of townscape merit.

Impact on the Market Place / London Road Conservation Area

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



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

- 9.163. The proposed scheme will redevelop the site to reinstate active uses in this location. As the site has been vacant for a significant period of time, the re-use of the site is considered to have a positive impact on the appearance of the Conservation Area.
- 9.164. The proposed uses (residential, retail, office and pub) are considered to be appropriate for this location and will enhance the character of the Conservation Area. The uses have been identified by the Council as being appropriate for the site in their emerging Local Plan site allocation (Policy CR14d) and is therefore considered to be compliant. No objections have been raised by officers previously in this regard.
- 9.165. Historic England have already confirmed within their written response dated 03 April 2017 (see Appendix 9) that they do not consider the proposed increase in bulk and height as having a harmful impact to the Conservation and the proposal is considered acceptable in this regard.
- 9.166. The main concerns in relation to the impact on the Conservation Area have surrounded the replacement of the Friar Street elevation, as No. 175 Friar Street is identified to be a building of townscape merit in the Conservation Area Appraisal, although no justification is given for this within the Conservation Area statement.
- 9.167. Further commentary on the Friar Street elevation is provided in the following sections however there has been a clear design evolution to arrive at the scheme as submitted. The design now integrates with the neighbouring buildings and is rooted in its site through the use of materials and architectural details that are reflective of the Conservation Area. It is considered that the elevation will positively enhance the character and appearance of the Conservation Area.

Impact on nearby Listed Buildings

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

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

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

St Laurence Church

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



Figure 31 – Grade I Listed St Laurence Church

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

Town Hall and Offices and Clock Tower

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



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

9.173. The Town Hall is of significance as a high-quality example of ambitious late-Victorian architecture. Like the Church, the setting of the Town Hall comprises the surrounding Market Place / London Street Conservation Area. The building again is a local landmark for the town centre of Reading and is visible in key views within and into / out of the Conservation Area.

9.174. The Town Hall has recently received Listed Building Consent in September 2017 to provide internal alterations to the building including the creation of a café at ground floor level (ref: 170987/LBC). The entrance to the café will sit directly opposite the application site to enhance the vibrancy to the pedestrianised Town Hall Square.

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23 – 46 Market Place

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



Figure 33 – Grade II Listed 23 – 46 Market Place

Impact on Listed Buildings at Market Place

9.176. Nos. 27 and 28 Market Place were Grade II listed for group value in 1957. A full copy of the listing description is provided at Appendix 1. Nos. 29 – 31 Market Place was Grade II listed for group value in 1973, a copy of the full listing description is provided at Appendix 1. No 32 Market Place was Grade II listed in 1978 and the full listing description is also attached at Appendix 1.

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

- 9.177. The submitted heritage report, prepared by Turley, identifies the significant of these buildings and their contribution to the Conservation Area.
- 9.178. The proposed scheme involves securing a viable new uses for the listed buildings within the application site, some of which have been previously considered acceptable through historic permissions and others which have been suggested by RBC as being appropriate (emerging Policy CR14d). This includes the selective demolition of the existing modern rear elements of no special interest to better reveal the repaired historic buildings compared to the 2008 scheme (ref: 80740) and various internal alterations to the properties.



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

- 9.179. Overall, the approach for the proposed adaptation of the listed buildings has been to retain and repair elements that make the greatest contribution to the heritage significance, such as retaining part of the historic plan form, fabric and features, focussing the greatest level of change within areas already compromised by 20th Century additions and have low heritage interest.
- 9.180. It is for these reasons that the proposed scheme will have minimal impact on the listed buildings that form part of the application site. The proposed scheme will seek to preserve and enhance the special interest of these properties in a similar manner to which has already been considered acceptable through previous planning permissions. The proposed scheme is there considered to be acceptable an in accordance with Policy CS33 and section 12 of the NPPF in this respect.

Replacement of Friar Street elevation

- 9.181. Throughout the pre-applications discussions with RBC, the issue of 175 Friar Street being a façade of townscape merit has been raised with the requirement to re-provide a high quality standard of design. The façade is considered to be a 'Non-Designated Heritage Asset' for the purposes of paragraph 039 of the National Planning Policy Guidance. Officer's consider there to be no 'in principle' objection to the replacement of this elevation however the design of the replacement building would need to be of exemplary design standards to balance its appearance within the Conservation Area (pre-application response January 2017) together with the range of public benefits and historical benefits that will be delivered in accordance with paragraph 135 of the NPPF.

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- 9.182. The existing elevation to 173 – 177 Friar Street is shown in Figure 36 below. The photo was taken in early 2016 and the site has since been completely blocked off with hoardings installed to the entire ground floor frontage to prevent public access. No 175 Friar Street, whilst recognised as a building of townscape merit, does not provide any active positive contribution to the Conservation Area in its current position. It is also considered that the elevation has a more evident negative impact on nearby Listed Buildings in its current poor condition.
- 9.183. The elevation is constructed from a post war red brick design with a form of window hierarchy moving up the building. At street level, there is a light stone used to create a former active frontage and distinguish the entrance to the former arcade. Signage was also used at street level and third floor level however this is now redundant with parts of the signage missing at ground floor level.



Figure 36 – Existing Friar Street elevation in March 2016

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Figure 37 – pre-application June 2016 scheme

9.184. Following the scoping meeting in January 2016, a formal pre-application submission was made in June 2016 as shown in figure 37 above. The building was constructed of a light material to take references from the church and would be a storey taller than adjacent 23 – 24 Market Place. The Council's written response, received in January 2017, noted that,

"The indicative frontage design for Friar Street shows a series of blocks with a number of large windows which do not relate the (sic) fenestration on adjacent Listed Buildings or in the surrounding Conservation Area" (page 4)

9.185. And,

"In relation to detailed matters such as materials these should incorporate a palette in keeping with the surrounding historic buildings and possibly the inclusion of some pattern work" (page 5).

9.186. In direct response to officer's comments, the scheme design was revisited and the use of red brick was introduced to take references from 172 Friar Street.

9.187. In March 2017, full revised elevational designs of the building were submitted to the LPA for comment. A meeting was held on the 03 May which was attended by officers and Richard Peats of Historic England. The design iteration in March 2017 was a red brick design as shown in figure 38 below; however, Historic England sought for a lighter material to connect the building with the church. Historic England issued their written response on 03 April 2017 which raised concerns over the design and was not considered sufficient to outweigh the replacement of this façade. The written response did, however, note,

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“Nevertheless, we acknowledge that restoring the early-20th Century building line would be a positive move and would not object to the demolition of these buildings if their replacements were of higher architectural quality than the existing; the gain in townscape terms could outweigh the harm to the area’s historical interest” (page 2).

9.188. This original building line can be clearly seen in the image of the site in 1893 (figure 29). The exposure of the largely blank flank elevation of the listed building at 23 - 26 Market Place is a modern condition, never intended to be seen and is certainly not a positive character of the area. Reinstating the proven historic building line is a significant heritage benefit to the scheme. This reinstatement of the building line has been a consistent feature of the pre-application proposals and the support given by Historic England to this element of the scheme further supports its heritage benefit to the overall scheme.



Figure 38 – March 2017 pre-application design

9.189. Following the meeting in May, further design work was prepared by the architects and submitted to Historic England as shown in Figure 39 below. The response from Historic England dated 02 May 2017 was increasingly supportive of the move from red brick to a lighter material and the separation in volumes representing the two properties in this frontage giving the building more of an identity and the reinstatement of the original building line which has been determined as a heritage benefit. It should be noted that this elevation reflected the previous residential use of the site from first level and above which has since been replaced with office floorspace.

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Figure 39 – Revised Friar Street elevation May 2017

- 9.190. Each iteration of the scheme was not considered to go far enough in terms of balancing the integration to avoid being pastiche but be in keeping with the surrounding character of Reading town centre despite directly responding to officer's comments. It was considered that conflicting advice was often received making it difficult to achieve any real progress and in delivering the package of public benefits from the redevelopment of the site. The site therefore remains in a vacant, derelict state.
- 9.191. At the meeting on the 22 January between officers and the project team, where the revised proposal shown in figure 40 below was presented which now included the office element at floors 1 – 3 and residential at set back floors 4 – 7. This design was presented to respond to officer's comments to make the building more contemporary.

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Figure 40 – Friar Street Elevation presented 22 January 2018

- 9.192. Officers considered that the elevation was too contemporary and did not appropriately reflect or integrate with its position in Reading. Officers again recommended that further design work was undertaken to improve the overall design by taking references from its context and demonstrating a window hierarchy which is a typical trait of design in Reading.
- 9.193. On this basis, further contemporary contextual work was undertaken and presented at a meeting with Councillor Page on the 25 January and to officers on the 29 January as shown in figure 41 below.



Figure 41 – Friar Street Elevation presented 25 & 29 January 2018

9.194. The design for the Friar Street elevation as submitted, follows the design of the elevation during the last pre-application consultation with officers on the 29 January 2018. At the meeting, officers considered that the proposed elevation had positively responded to comments received and now proposes a softer more integrated approach taking references from the buildings immediately adjacent. The design now includes banding representing cornicing across the top of the front elevation referencing No. 172 Friar Street whilst using materials that are reflective of the Church as recommended by Historic England. Mixed brick banding has been proposed at first – third floor level to emphasis the window hierarchy as one moves up the building. The building is also separated in volumes by proposing a slight projection to no. 175 Friar Street which also includes a different fenestration and window arrangement to further differentiate between the two parts to the site.

9.195. The proposed building will continue to reinstate the original building line (being a clear heritage benefit) and will sit slightly proud of adjacent buildings. Both features which have previously been considered acceptable by officers and Historic England (para 2.5, pre-application response May 2017, page 3, pre-application response July 2017 and Historic England response dated 03 April.

9.196. In evolving the design of the Friar Street elevation, consideration has been given to the poor state of the existing elevation which has been left for over ten years. It should also be clearly noted that this site has always featured an extensive frontage which is demonstrated in figure 29 which shows the previous building at the site prior to the second world war. This clearly demonstrates that the site is capable again of having an extensive frontage in this location to reinstate another clear heritage benefit of the site.

9.197. Historic England have also demonstrated broad support for the revised elevation as submitted in commenting (see Appendix 11):

“The Friar Street façade is now much more formal and regular...I quite like the regularity and the way in which the top of the third floor is given a little emphasis that recalls a cornice. The way in which the arrangement of the façade subtly changes in the projecting element also works well”

9.198. And,

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

9.199. Given this support from Historic England, we consider that the revised design has overcome previous concerns in respect of the replacement of No. 175 Friar Street in heritage terms. It is now entirely appropriate for this location and will enhance the character and appearance of the building and the Conservation Area. The building provides a contemporary and elegant response to its position within Reading town centre without being pastiche.

9.200. Whilst the previous consent did not seek to replace the Friar Street elevation, the conclusions within the previous Committee Report associated with the consented scheme are considered relevant in noting that,

“it is generally agreed, following discussions with English Heritage and the Applicant’s architect that the facades of the existing buildings are not of any particular architectural merit in themselves”

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9.201. Since the 2007 permission, the site has only fallen into greater disrepair and the current proposals present a heritage opportunity to enhance the character and appearance of the prominent site in Reading town centre. The proposed scheme therefore complies with the principles of Core Strategy Policy CS7, emerging Policy EN1 and the Market Place / London Road Conservation Area Appraisal and is acceptable in this instance.

p) Design – Internal (Commercial)

9.202. The offices will be accessed from an office lobby from Friar Street. This level of frontage has been kept to a minimum to comply with the Council's retail policies. The lobby will be managed by a security team to ensure that the offices meet Part Q of the Building Regulations.

9.203. The proposed office element in the Friar Street building will be largely open plan with a central core for lift, stairs and toilets facilities.

9.204. The offices will provide modern accommodation and services suitable for all types of business tenants. The offices could be let to one single tenant or they could be equally be divided for separate occupation.

9.205. The offices will have large levels of glazing to all elevations to ensure that the floorspace receives sufficient levels of natural daylight and sunlight.

q) Design – Internal (Residential)

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

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

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Unit No.	Unit Type	Unit Size (sqm)	NDSS Requirement (sqm)
1	1B2P	51.3	50
2	City Suite (1B1P)	47.1	39
3	1B2P	51.5	50
4	2B3P	61.3	61
5	2B3P	63.2	61
6	2B3P	61.8	61
7	2B3P	76.4	61
8	1B2P	58.9	50
9	City Suite (1B1P)	42.9	39
10	1B2P	51.5	50
11	City Suite (1B1P)	42.6	39
12	1B2P	53.4	50
13	1B2P	54.9	50
14	1B2P	51.3	50
15	City Suite (1B1P)	47.1	39
16	1B2P	51.5	50
17	1B2P	51.6	50
18	2B3P	68.2	61
19	1B2P	57	50
20	City Suite (1B1P)	42.9	39
21	1B2P	51.5	50
22	City Suite (1B1P)	42.6	39
23	1B2P	53.4	50
24	1B2P	54.9	50
25	3B4P	74.4	74
26	2B3P	65.9	61
27	2B3P	65.7	61
28	2B3P	62.7	61
29	1B2P	50.6	50
30	City Suite (1B1P)	43.2	39
31	1B2P	55.8	50

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32	3B4P	74	74
33	2B3P	61	61
34	City Suite (1B1P)	42.9	39
35	2B3P	69.4	61
36	City Suite (1B1P)	49.4	39
37	2B3P	100.9	61
38	1B2P	56.3	50
39	City Suite (1B1P)	49.3	39
40	3B5P	101.7	86
41	2B4P	83.4	70
42	City Suite (1B1P)	49.3	39
43	2B3P	66	61

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

r) Design – Amenity

9.209. Adopted Policy DM10 requires the provision of outdoor space for residential accommodation and recognises that development needs within Reading can be different to those in the rest of the Borough (para 5.6.5).

9.210. In accordance with this policy, 13 units will have access to private residential amenity where possible and design permits. These outdoor spaces have been designed to complement the appearance of the proposed building and will not be visible from street level. This is a common feature of development within Reading town centre where there is a tight knit urban environment and a need to preserve the historic environment.

9.211. Owing to the constraints of the Listed Buildings fronting the Market Place, there will be no residential amenity space provided however this approach is reflective of the exceptions outlined in Policy DM10. In this instance the need to protect the special interest of these Designated Heritage Assets outweighs the need to provide private amenity space and should be considered acceptable in accordance with Policy CS33.

9.212. On the basis that not all residential units have access to private residential amenity, the surrounding context of the site has been reviewed to ensure that residents will have access to public green spaces to comply with Core Strategy Policy CS30.

9.213. The site is in close proximity to Forbury Gardens which is approximately a 5minutes' walk from the application site. The gardens have recently been renovated and provides a quiet, peaceful location in an urban environment.

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9.214. The application site is also a 12 minutes' walk from the River Thames which runs to the north of Reading train station. Along the river runs the Thames Path which provides attractive amenity value for future residents. To the north and the south of the Thames are two larger open spaces, Christchurch Meadows and Kings Meadow providing added leisure benefits to the location of the application site.



Figure 42 – Location of local amenity

9.215. The application site is therefore considered to provide a good level of access to open spaces in line with Core Strategy CS30 and DM10 to mitigate the minimal level of private space provided.

s) Design – Access

9.216. Core Strategy Policy CS5 requires all buildings to provide suitable access to, into and within its facilities for all potential users.

9.217. Both the residential and the office elements will be entirely accessible for all potential users. Two lifts will be installed to the residential element from basement to seventh floor level. Likewise, two lifts will be installed to the office element from basement to third floor level. Both entrances to the residential and the office lobbies will be level to again permit access for all.

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- 9.218. As the retail units are predominantly at ground floor level only these will comply with Policy CS5. Retail units 1 and 2 will however only have stair access down to basement level ancillary areas. It not considered that this will prevent access to potential users as the main sales area will be at ground floor level, typical of most retail units. Should an end occupier require a lift between ground and basement levels this can be installed where required.
- 9.219. Level access will be provided to all new retail units in the Friar Street building to ensure access into the units are suitable for all.
- 9.220. In contrast, the residential and retail units within the properties on Market Place will not have lift access owing to the need to preserve the special interest of the listed buildings. No objections to having only stair access to these properties has been raised by the Council during the extensive pre-application discussions. Officer's recognise the greater heritage benefit in retaining the original fabric in this respect.
- 9.221. Level access will also be provided throughout the public right of way across the site as per the current arrangements. Public access will be permitted between certain daytime hours after which point the gates will be closed for security purposes. Fob access will be provided for residents to ensure safe access to the residential entrance once the gates have been locked. The scheme will be designed to meet Part Q of the Building Regulations.
- 9.222. The proposed scheme is therefore considered to be fully compliant with Core Strategy Policy CS5 to provide a safe and accessible development for all.

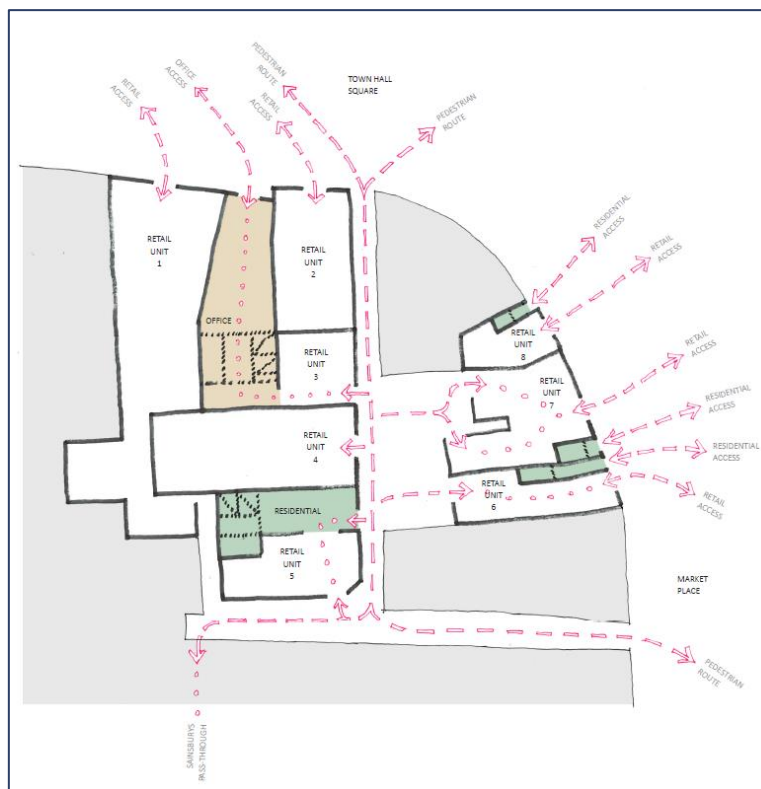


Figure 43 – Access arrangements

t) Amenity

9.223. Policy DM4 of the Council's Sites and Detailed Policies Document sets out that *"development will not cause a significant detrimental impact to the living environment of existing or new residential properties in terms of:*

- *Privacy and overlooking;*
- *Access to sunlight and daylight*
- *Visual dominance and overbearing effects of a development*
- *Noise and disturbance*
- *Artificial lighting*
- *Vibration*
- *Dust and fumes*
- *Smell; or*
- *Crime and safety"*

9.224. The proposed development has been designed to have regard to and not cause material harm to the amenity of existing and future residential tenants. On this basis, a full assessment of each point has been provided below to demonstrate compliance with DM4.

9.225. It should be noted that there are no existing residential tenants in close proximity to the site, only commercial uses. Therefore the assessment has been conducted on future amenity.

u) Amenity - Daylight and Sunlight

9.226. The proposed development has been carefully designed to maximise levels of daylight and sunlight to all elements of the development. A comprehensive daylight and sunlight assessment has been prepared by Delva Patman Redler and is submitted as part of this application to assess the impacts on neighbouring and future residents of the development. The report demonstrates that 98% of the proposed residential units will meet the BRE requirements in accordance with Policy DM4, being a very good level for a town centre environment.

9.227. The proposed residential units within the new build element will all be dual aspect and benefit from sufficient levels of daylight being located at fourth to seventh floor levels. All of the units within the Friar Street Building pass the Average Daylight Factor test for all habitable rooms and is therefore compliant with Policy DM4.

9.228. The residential units within the Listed Buildings are more constricted due to the requirement to protect the heritage asset. In consultation with our Heritage Consultants, sensitive new openings are proposed to the rear of the listed buildings in addition to four conservation style rooflights to No. 32 Market Place. The results of the Daylight and Sunlight assessment show that only 2 rooms within the Listed Buildings (bedroom at first floor of 27 – 28 Market Place and a living room at third floor of 29 – 31 Market Place) do not fully comply with the BRE Guidance. These rooms however form part of dual aspect flats and so these rooms form part of flats that will provide well-lit dual aspect living accommodation on the whole.

9.229. The new openings together with the rooflights will ensure that the maximum level of daylight and sunlight is provided to each property within the Market Place buildings. The proposed units are therefore considered on balance to comply with the BRE Standards and the requirements of Policy DM4.

- 9.230. The proposed office floors will benefit from windows to the front, rear and eastern elevations. To the west elevation a lightwell will also serve these levels to capitalise the level of daylight to the floorspace. As the office is non-residential floorspace this has not been specifically assessed as part of the Daylight & Sunlight Assessment however the level of glazing proposed will ensure that the floorspace receives good levels of natural daylight and sunlight in accordance with Policy DM4.
- 9.231. An assessment has also been undertaken to assess the impact on the nearest residential accommodation at 36 - 43 Market Place. The results of the daylight and sunlight assessment show that 96% of the 26 neighbouring habitable rooms fully comply with the BRE guidelines for Vertical Sky Components, all rooms will also comply with the No Sky Line and Average Daylight Factor tests. The one room which does not fully comply with the BRE guidelines for VSC will only be 3% beyond the guidance and therefore only represents a minor adverse impact. The proposed scheme on balance therefore provides a good level of amenity for existing residential occupiers in accordance with Policy DM4.

v) Amenity – Sense of Enclosure

- 9.232. Adopted Policy DM4 requires a separation distance of 20m between dwellings to protect residential amenities. Owing to the site constraints and orientation of the buildings, the site would be unable to achieve the required 20m separation distances, particularly between the Friar Street building and the Market Place properties as the distances range between 10m – 17m.
- 9.233. In recognising this, suitable design changes have been made to the scheme to ensure that there is no sense of enclosure for future residents.
- 9.234. During the January 2018 pre-application discussions, officers raised concerns with having 1B1P units to the rear of the Market Place properties. These were previously proposed at first and second floor level to the rear wing and would have windows facing north and west towards the office floors of the Friar Street building. The separation distance between the rear wing and the internal elevation of the Friar Street building would be approximately 10m at this point which was considered to be reflective of the 'tight – knit' urban character.
- 9.235. Officers recommended that the applicant remove 1B1P units to the rear by amalgamating units within the Market Place properties. In direct response to officer's comments, the scheme has amalgamated units to now proposed a 2B4P unit (unit 37) at first floor and a 3B5P unit (unit 40) at second floor level.
- 9.236. These units will now be triple aspect having views towards Market Place and to the rear of the Market Place properties. This has overcome previous officer concerns to ensure that the quality of accommodation is of a high standard and there is no sense of enclosure for future occupants.
- 9.237. All other units at first, second and third floor levels of the Market Place properties will also have views to the Market Place as well as to the rear of the buildings. In line with officer's comments, this will ensure that there is no sense of enclosure to these units.
- 9.238. Following the introduction of offices within the scheme, the residential floorspace has been moved up the building to be at fourth to seventh floor levels. This has meant that future occupants will not experience any sense of enclosure from neighbouring buildings as they will be above the height of these properties.

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9.239. It is considered that the proposed scheme will be acceptable as suitable changes have been made in line with officer's advice to ensure that the scheme avoids any sense of enclosure. The proposed scheme is therefore considered to be in accordance with Policy DM4 and will protect residential amenities.

w) Amenity – Privacy and outlook

9.240. Adopted Policy DM4 of the Council's Sites and Detailed Policies Document requires development to avoid any adverse harm to the living environment of existing or new residential properties, including privacy and outlook.

9.241. Owing to the tight knit urban environment, the proposed design has been careful to avoid any adverse impacts to existing or future residential amenity.

9.242. The proposed properties to the Market Place properties will have outlook to both the Market Place and the rear of the buildings with many of the units being triple aspect. The level of outlook to these properties is considered to be of a high standard.

9.243. The Market Place properties will face the eastern elevation of the offices which is proposed to be largely glazed. In order to overcome any amenity issues between the two uses, angled louvres will be installed to this entire elevation from first floor level to third floor level of the offices to force views upwards. This will prevent any direct overlooking between the two elements and retain levels of privacy for future residents.

9.244. It is considered that this design intervention will suitably overcome any concerns and ensures that the scheme is in accordance with Policy DM4.

9.245. The new residential units within the Friar Street building are proposed from fourth floor and above. In locating the units at upper levels has directly addressed previous officer concerns of mutual overlooking between units and residents within the Market Place and any loss of privacy issues from being located at lower levels.

9.246. The majority of new units within the Friar Street Building will be dual aspect, particularly those units on the northern elevation which overlook the M&S site and provide a general high standard of accommodation. This has been achieved so as not to prevent any future development coming forward on this site. Units which are single aspect will be located on the eastern elevation and will therefore receive good levels of daylight and sunlight. These units will also have an outlook towards Market Place and St Laurence Church which is considered to be appropriate.

9.247. In terms of overlooking between units, the design of the upper floors has been proposed in a broad 'C' shape so that there is a sufficient distance of approximately 18m between units avoiding any potential amenity impacts for future residents. The proposal has also strategically placed windows in locations where there would be no overlooking between units, allowing views in certain directions only.

9.248. No objections have previously been raised by officers in respect of the orientation and positioning of the residential units, recognising the design interventions that have been proposed to maintain a good level of amenity for future residents.

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9.249. The proposed scheme is therefore considered to provide a good standard for accommodation for future residential tenants, maintaining a good level of privacy and providing a good level of outlook for all occupants. The proposed scheme is therefore in accordance with Policy DM4.



Figure 44 – Controlled views to offices

x) Amenity – Noise and disturbance

9.250. Paragraph 123 of the NPPF sets out the national requirements in respect of noise which requires planning decisions to avoid the adverse impacts to the quality of life or health.

9.251. A full noise assessment has been undertaken by RBA Acoustics to support this planning application. The noise survey has been undertaken between 25 January – 30 January 2018 to establish the background noise levels at the site. Three positions were used to establish the background noise levels across the site including the Friar Street façade, the Market Place façade and one position internally within the site overlooking the rear podium roof.

9.252. The results of the background noise survey has informed an assessment of the external fabric of the building, the internal fabric of the building (particularly between separating floors), traffic noise impacts and plant noise emissions criteria in accordance with the relevant British Standards, IEMA Guidelines and the WHO Guidelines.

9.253. The conclusions of the report have found that the proposed development would create high standard of accommodation for all uses proposed in accordance with Para 123 of the NPPF. It is envisaged that suitably worded conditions could secure the requirement for further details of acoustic attenuation where required.

y) Amenity - Microclimate

9.254. A Pedestrian Level Wind (Desk Based) Assessment has been prepared by RWDI and submitted in support of this application. The report includes a qualitative assessment of the wind microclimate on and around the proposed development.

- 9.255. The conclusions of the report demonstrated that the wind microclimate around the proposed development is expected to be suitable for the intended uses including the environment through the public access route and most entrances to the site.
- 9.256. It is however expected that during the winter months when the UK climate is typically windier, that conditions to the residential entrance are expected to be occasionally windier than desired. Two options for wind mitigation measures have been proposed as part of the report to ensure that conditions for future residents are acceptable. These mitigation options include either recessing the residential entrance by 1.5m or providing a wind screen of a similar depth to the south of the entrance. It is envisaged that such a mitigation measure can be suitable secured by condition.

z) Air Quality

- 9.257. Reading is identified as an Air Quality Management Area (AQMA) and the application site is located within a key part of the AQMA. Adopted Policy DM19 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 9.258. The Council's pre-application response dated 24 January 2017 sets out the as there is no car parking proposed at the site, the development will, "*create minimal additional traffic movement or air quality impacts*" (page 6).
- 9.259. It should also be noted that the proposed residential dwellings will be located from fourth floor and above moving sensitive uses away from the primary areas of potential air pollution.
- 9.260. The proposed scheme, as described by the Council, is unlikely to create harmful air quality impacts and is therefore considered to be acceptable in accordance with Policy DM19.

aa) Ecology

- 9.261. Core Strategy Policy CS36 requires development to protect, retain and incorporate features of biodiversity or geological interest.
- 9.262. Owing to the derelict and vacant nature of the site, an inspection of the site was undertaken in November 2017 by CSA Environmental to determine the potential of the site to host roosting bats.
- 9.263. The results of the inspection determined that the potential of 173 – 175 Friar Street buildings to support any roosting bats was negligible. It was also found that the potential of the Market Place properties was 'low' however it is recommended in the submitted bat survey report that a single emergence / re-entry survey is undertaken with the deployment of a remote bat detector within the roof void of the Market Place buildings.
- 9.264. It is anticipated that this additional survey can be secured by condition and submitted prior to any works taking place to the Market Place properties. This will ensure that the survey will be undertaken during the relevant period of the year to ensure the most accurate results.

- 9.265. Should any bats be identified during the survey, a separate condition is proposed that requires the submission of suitable mitigation measures to ensure there is no harm to any potential habitats again prior to the commencement of works on the Market Place properties. Suitable mitigation measures could include, but is not limited to, integrated bat boxes within the elevations of the Friar Street Building.
- 9.266. On this basis, the proposed scheme is considered to fully comply with Core Strategy Policy CS36 and will ensure that any habitats are protected.

bb) Trees and Landscaping

- 9.267. Core Strategy Policy CS38 sets out that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal.
- 9.268. There are no protected trees that exist on the application site and there is no removal of existing trees proposed as part of the development.
- 9.269. The proposed scheme will also provide a limited level of hard landscaping to the rear of the Market Place properties and it is anticipated that full details of this landscaping can be secured by condition. At upper levels of the Friar Street building, green roofs will be provided to the flat roof areas where possible.
- 9.270. A full landscaping plan is anticipated to be provided as part of the pre-commencement requirements. The proposed scheme is therefore considered to comply with Core Strategy Policy CS38.

cc) Drainage and SUDs

- 9.271. Core Strategy Policy CS1 requires development to incorporate sustainable urban drainage facilities and techniques as part of any proposal. The policy goes on to require the minimisation of impermeable areas so that water run-off is reduced. Adopted Core Strategy Policy CS34 states that development will only be permitted where it would not be damaging to the environment and ideally development would enhance ground and surface water quality.
- 9.272. This is repeated in Policy DM1 which requires all development to minimise the impacts of surface water runoff through the design of the drainage system.
- 9.273. On this basis, a detailed SUDs report has been prepared by Clancy Consultants and is submitted in support of this application. The report identifies that the proposed scheme will provide new opportunities to reduce local area flood risk by controlling surface water on site.
- 9.274. Following the SuDs and water disposal hierarchy it has been determined that surface water will be controlled using green roof areas to the Friar Street building and flow controls with an attenuation tank proposed on site. The attenuation tank will retain water before discharging into the public surface water sewer system. The tank will be designed to control surface water run-off for all storms up to and including the 100 year plus climate change event.
- 9.275. The proposed scheme has therefore been designed to meet the Sustainable Drainage Systems Non-Statutory Technical Standards (March 2015) and therefore considered acceptable in this respect.

- 9.276. Foul water rates are expected to increase slightly as a result of introducing new development on the site. It is noted that Thames Water will be consulted as part of the application and will confirm that the existing sewer system is capable of accommodating the additional level of discharge.
- 9.277. The proposed scheme has therefore been designed to meet the requirements of Core Strategy Policy CS1, CS34 and Policy DM1 is considered to be fully compliant in this regard.

dd) Energy & Sustainability

- 9.278. Core Strategy Policy CS1 requires all development to be designed to be the most sustainable and energy efficient as they can be. The Policy goes on to require all major commercial development to achieve a BREEAM rating of 'excellent' as a minimum.
- 9.279. This is echoed in Sites and Detailed Policy DM1 which requires new buildings to maximise opportunities for carbon reductions. Policy DM2 expands on DM1 to discuss the requirements for BREEAM standards and where a decentralised energy system would be required from major development.
- 9.280. Policy DM2 requires developments of more than 20 dwellings to consider the inclusion of a CHP system unless it can be demonstrated that the site is not suitable or feasible for this form of energy provision. A comprehensive Energy & Sustainability Report has been prepared by Price & Meyers which sets out the measures that will be installed to ensure that the site achieves the maximum reduction in carbon.
- 9.281. Policy CS1 requires all major proposals to provide on-site renewable technologies or design measures to generate at least a 20% carbon reduction. Emerging Policy CC3 also requires development to maximise their resistance and resilience to climate change.
- 9.282. The energy strategy for the development involves the installation of 18 PVs at roof level, two combined gas boiler systems for the residential element and the office elements within the Friar Street building. Individual gas boilers will be provided for the uses within the Market Place properties.
- 9.283. Policy DM2 requires major development to connect to existing heat networks where feasible. The application site does not lie in an area where there is an existing heat network and it not therefore able to connect to such a network. The provision of a communal gas boiler system for the residential and office element in the Friar Street building will however ensure that the site is future-proofed should a heat network be developed in this part of Reading. The site is therefore considered to comply with Policy DM2 in this respect.
- 9.284. The proposed scheme is targeting BREEAM 'Excellent' for the new build retail and office elements and BREEAM 'Very Good' for the refurbished Market Place properties. BREEAM pre-assessments have therefore been submitted for each of the uses proposed to demonstrate the commitment of the site.
- 9.285. The proposed scheme will therefore achieve a highly sustainable development with a commitment to reducing carbon emissions from the site. The proposed scheme is therefore considered to comply with Policies CS1, DM1, DM2 and emerging Policy CS3. The application is also compliant with the Council's Sustainable Design & Construction SPD.

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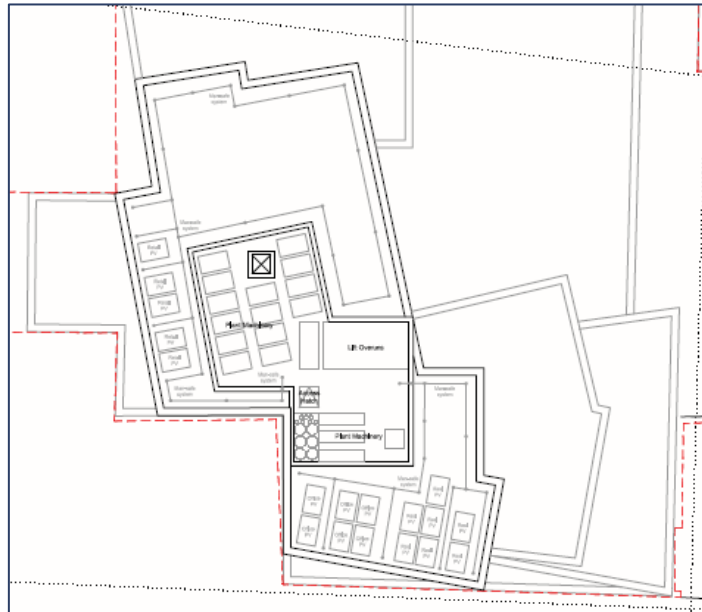


Figure 45 – Proposed location of PVs at roof level

ee) Transport and Highways

9.286. Core Strategy Policy CS22 sets out that permission will not be granted unless developments make an appropriate provision for all modes of transport which should be demonstrated by the submission of a transport assessment. Adopted Policy DM12 sets out the requirements for developments that will generate additional trips on the transport network.

Trip Generation

9.287. To this end, a full Transport Statement has been prepared by Motion, and is submitted as part of this application. The Transport Statement analyses the transport demands of all future land uses that form part of the development using results from the TRICS database.

9.288. The application site lies within a highly accessible location within the town centre of Reading. It is within walking distance of a significant level of shops, services and facilities. It is not envisaged that there will be substantial additional levels of vehicle trips to and from the site, other than for servicing and deliveries.

9.289. The anticipated increased level of trips is likely to be dominated by walking and cycling. These will be from residents, staff and visitors to the site.

9.290. It is likely that the proposed office element will generate the majority of trips during the am and pm peak times which is as expected. As the site is in an accessible location and without dedicated car parking it is unlikely that these trips will be made from cars but other methods of transport i.e. cycling, train and walking.

9.291. The residential element of the scheme will also generate additional person trips during the am and pm peak hours although this is thought to be significantly fewer than the office floorspace. Again, as the site is highly accessible by public transport it is considered that the anticipated person trips will be acceptable.

- 9.292. A Travel Plan has also been prepared by Motion in support of this application, to ensure that future occupants of the development are encouraged to choose alternative and more sustainable methods of transport to access the site. It is anticipated that a final Travel Plan can be secured by condition to deal with each land use in further detail and personalised to an end occupier.
- 9.293. It is therefore envisaged that the existing transport and highways network will be able to accommodate the expected person trips and is therefore considered to comply with Policy CS22.

ff) Parking

- 9.294. Core Strategy Policy CS24 highlights that the maximum car parking standards for car and cycle parking will be applied to development in relation to the accessibility of sites across the Borough. The policy aims to encourage more sustainable methods of transport such as cycling and walking, particularly in accessible locations.

Car parking

- 9.295. The Council's revised Parking Standards and Design SPD sets out the Council's requirements for car parking provision across the Borough.
- 9.296. For residential uses in Reading the standards are 0.5 spaces for 1 beds and 1 space for 2+ bedroom flats. For offices in Reading the requirement would be 1 space per 250 sqm and only public parking would be required for retail uses in the town centre. The SPD notes that should a lower level of parking be required full justification should be provided to satisfy the Council's highways officers.
- 9.297. The application site is located within a highly accessible location and is in close proximity to a number of methods of public transport as well as Reading Station which will benefit from Crossrail from December 2019. As such, the proposed scheme will be car free, which has been supported throughout the pre-application discussions. This is reflected and confirmed by officers in their written response who state,

"The scheme is proposed with no vehicular parking, this is considered by officers to be acceptable in this town centre location" (pre-application response dated 19 July 2017, page 6).

- 9.298. And,

"No car parking is proposed but given that the site is located in the town centre this is deemed acceptable" (pre-application response dated 24 May 2017, page 4).

- 9.299. The submitted Transport Statement further justifies the car free nature of the scheme in the context of its location. The proposed scheme is considered to comply with the Council's Parking Standards and Design SPD.

Cycle Parking

9.300. The Council's Revised Parking Standards and Design SPD also sets out the requirements for cycle parking within the Borough. Cycle parking is considered to be essential for most developments and should support the reduction in vehicular parking (page 20 of the SPD).

9.301. Within the centre of Reading, the following standards would apply:

- A1 Retail – 1 space per 6 staff and 1 space per 300 sqm
- A4 Pub – 1 space per 6 staff and 1 space per 300 sqm
- B1 Offices – 1 space per 200 sqm
- C3 Residential – 0.5 spaces per 1 and 2 bed flats and 1 space per 3 bed flats

9.302. The proposed scheme will involve the provision of cycle parking for all elements of the scheme. The cycle stores are primarily located at basement levels within the Friar Street building. At basement level changing facilities and lockers will also be provided for the office element.

9.303. The basement cycle parking to the Friar Street building is accessible by lifts for the residential and office elements as required by officers during the pre-application discussions who stated,

"These [cycle parking] should be located within an accessible location with the form of cycle parking fully detailed at application stage. It is noted that cycle parking is currently proposed within the basements of the site and this would not be acceptable unless lifts are provided, it is noted that some of the bike storage units are provided with lifts but not all" (pre-application response 19 July 2017).

9.304. In direct response to officer's comments the location for cycle parking has been reviewed, particularly to the Market Place properties. It is now proposed to locate the residential and retail visitor cycle parking to the rear of the Market Place properties at ground floor level.

9.305. Staff retail cycle parking for the Market Place units will be provided within units 6 and 8 at ground floor level.

9.306. The cycle parking associated with the pub in the Listed Building will remain at basement level and be accessed by stairs only. This will ensure that there is no compromise in the primary sales area of the pub located at ground floor making the unit more attractive for an end occupier. This is also a greater need to preserve the special interest of the properties and the installation of a lift would be unacceptable. It is therefore considered that on balance the proposed location of the cycle parking within the Listed Buildings is acceptable.

9.307. The total of cycle parking is provided as follows:

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Land Use	No. of Cycle Parking
Residential	43
Office	40
Retail	21
Public House	3

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

gg) Waste Management

Construction Management

9.309. Core Strategy Policy CS2 seeks to minimise the generation of waste during the demolition, construction and operation of the development.

9.310. It is anticipated that a demolition method statement together with a Construction Management Plan will be required for the redevelopment of the site. The plans will set out in further detail how the construction phases will be undertaken along with the management and general handling of waste in a sustainable manner.

9.311. As confirmed by officers in their written response dated 24 January 2017,

"It is common that a Construction Method Statement is conditioned and determined separately of the planning application" (pre-application response 24 January 2017, page 8).

9.312. We therefore would consider it reasonable for the LPA to secure a Construction Method Statement by way of planning condition as per their earlier advice. The proposed scheme is therefore considered to be fully compliant with Core Strategy Policy CS2.

Delivery and Servicing

9.313. There is no vehicle access to the site and it is therefore proposed to utilise the existing on-street loading opportunities within the vicinity of the site (Blagrove Street and Friar Street) which is also consistent with the previous use of the site. The submitted Transport Statement sets out the opportunities surrounding the site for deliveries and servicing requirements at Figure 4.1.

9.314. As the site is capable of providing suitable arrangements for delivery and servicing, the proposed scheme is considered to be acceptable in this regard.

9.315. Advice has been consistent during the pre-application discussions in relation to servicing and deliveries,

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“Confirmation would be required as to bin collection again as a result of bin stores being located in basements with no lift access to all bin stores and that they are to be accessed from within the retail units with no external doors”

- 9.316. The main bin stores for the office and residential elements of the scheme are provided at basement level and accessible via the lifts within the building. Refuse collections for the office will take place in a ‘just in time’ approach with the office building manager having responsibility for refuse collections.
- 9.317. A platform lift is proposed to the residential bin store to exit onto Market Way. The residential building manager will be responsible for transporting bins to a dedicated collection site for a ‘just in time’ collection service.
- 9.318. A separate bin store will be provided for retail units 1, 2, 3, 4, 5, 6, and 8 to the rear of retail units 1 and 4 at ground floor level. This will be accessed from Market Way to coordinate with the existing rear exits to M&S. Secure access doors will be installed fronting Market Way to ensure that only permitted access is possible.
- 9.319. It is expected that a comprehensive Delivery and Servicing Plan could be conditioned as part of any future planning approval to agree a suitable arrangement in accordance with Policy CC2.

hh) Public Right of Way

- 9.320. Page 2 of the pre-application response dated 24 January 2017 sets out that there is a historical right of way connecting Friar Street and Broad Street. The Council’s response acknowledges that this route has been somewhat limited following the Sainsbury’s development. There is however a route through the retail store during the opening hours as a ‘permissive path’ which was secured via a legal agreement.
- 9.321. This route has also been further hindered by the hoardings that have been erected at the application site to ensure that the site is safe and secure whilst it remains vacant therefore providing no public benefits.
- 9.322. There is also a public access route through the site which was agreed in clause f) of the legal agreement dated 15 August 1893 between Mr Joseph Charles Fidler and The Mayor of Reading. This clause stated,

“The said Joseph Charles Fidler / his executors administrators or assigns shall and will for ever hereafter open and keep open to the public the said arcade as defined by sub-clause (b) or clause 5 of these presents and hereby grants to the Corporation their successors and assigns for the use of the public and of all persons desiring to use the same free right of passage and way through the said Arcade to or from Friar Street aforesaid and the said Corn Exchange General Market and Market Passage or either of them at all hours at which the said Corn Exchange General Market or Market Passage shall for the time being be open to the Public or for any purpose whatsoever.”
- 9.323. The proposed scheme will re-introduce the access route through the site to connect with the ‘permissive path’ through Sainsbury’s and also onto Market Way providing access to Market Place. The right of way will be moved slightly eastwards so that the entrance from Friar Street sits between proposed retail unit 2 and 23 – 26 Market Place. The entrance onto Market Place will remain as existing adjacent to 33 – 34 Market Place.

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- 9.324. In accordance with the principles of Secure by Design, two access gates will be provided within the site to ensure safe and secure access for future occupants. It is proposed that the access gates will be closed by the building manager after the closing of the retail units and the offices. Fob access will be given to future residents so that access to the residential entrance and emergency access will be maintained after hours.
- 9.325. The proposed scheme, which will reinstate the public access route through the site will comply with the historic agreements in place and is therefore considered acceptable. Separate consent will be obtained to amend the public right of way following the grant of any planning permission.

ii) Sub Station

- 9.326. The proposed scheme will require the creation of a new substation to serve the new Friar Street building owing to the level of additional power demands from the site.
- 9.327. The substation will be located at basement level but is accessible via a platform lift from Market Way. Being located at this level will avoid any adverse noise impacts upon proposed and existing adjacent uses that cannot be mitigated through conditions or Building Regulations compliance.

10. Planning Obligations and Community Infrastructure Levy

Planning Obligations

- 10.1. The application proposals are likely to trigger a number of planning obligations that have been discussed during the pre-application process in accordance with the Council's Planning Obligations under Section 106 SPD.
- 10.2. The draft Heads of Terms therefore could include:
- i. Measures to secure Employment, Skills and Training;
 - ii. Measures to retain a public access route through the site;
 - iii. Public realm works;
 - iv. Highways improvements;
 - v. Measures to secure a Travel Plan and any associated monitoring fee;
 - vi. Measures to secure the proposed level of affordable housing.
- 10.3. The final obligations required from the development will be discussed and agreed during the determination of the application.

Community Infrastructure Levy

- 10.4. Reading Council adopted their CIL Charging Schedule in January 2015. For residential the charge is set at £120 per sqm across the Borough. In central Reading the CIL rate for retail is £0 per sqm and £30 per sqm for offices in the central core of Reading.
- 10.5. Based on the adopted CIL rates, an estimated CIL liability has been calculated, assuming securing relief for the affordable housing element.
- 10.6. To support this application, a CIL additional information form has been completed and submitted as part of this application. A separate affordable housing relief form has also been completed and is submitted as part of this application.
- 10.7. As part of the CIL calculations evidence to demonstrate that the existing former arcade building has been 'in use' for the purposes of the CIL regulations has been submitted under confidential cover for the Council's solicitors to review. We are therefore assuming that the existing floorspace within this part of the site can be treated as a credit towards any final CIL liability should permission be granted in the appropriate period for this to happen.

11. Public Benefits

11.1. The National Planning Policy Guidance (NPPG) defines public benefits as that which may follow from development and can be anything that delivers economic, social or environmental progress as described in paragraph 7 of the NPPF. Public benefits should flow from the proposed development and they should be of a nature or scale to be of benefit to the public at large, and should not be a private benefit. Benefits do not always have to be visible or accessible to the public in order to be a genuine public benefit. Public benefits should be weighted positively in the favour of the proposed development.

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

Social

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

New dwellings

11.4. The proposed scheme will deliver a total of 43 new dwellings in a range of unit sizes suitable for the needs of the town centre.

11.5. The proposed units will deliver 7% family sized accommodation which is above the Council's typical requirements.

11.6. The proposed scheme will deliver 30% on site affordable housing units which are pepper potted across the site. The proposed affordable will be split into 70% social rented and 30% low cost shared ownership units which has been recommended by both officers and councillors to meet a local demand.

Public Access

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

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

Re-provision of Public House

11.9. The proposed scheme will re-provide 260.4 sqm for an A4 public house unit at basement and ground floor of 29 – 31 Market Place.

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

Economic

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11.11. The proposed development will deliver a range of economic benefits in line with the NPPF as set out below.

Uplift in office floorspace

11.12. There will be a significant uplift in the level of office floorspace provided on site. The existing site provides approximately 1,803.2 sqm of B1 office floorspace which will be increased to 4,212 sqm.

11.13. The new office floorspace will provide approximately a minimum of 200 new jobs for Reading in the office element alone.

Re-provision of retail uses

11.14. The proposal will reinstate retail uses at ground floor level within this part of the town centre which has been left vacant for a significant period of time.

11.15. 7 retail units are proposed within the scheme plus the re-provision of one public house to 29 – 31 Market Place totalling 8 A-use class units. Not only with these units provide new jobs for the Borough, they will increase the level of expenditure within the town centre and reinforce the role of Reading as a primary shopping destination.

11.16. At least 4 of the retail units will be suitable for smaller occupiers being approximately 120 sqm or less.

11.17. The scheme will reinstate an active frontage to 173 – 175 Friar Street which is designated as a Primary Retail Frontage.

Revenue from the site

11.18. The redevelopment of the site to provide both commercial and residential uses will generate substantial additional Council income through Council Tax and Business Rates as well as enhancing local expenditure within Reading itself.

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

Jobs in construction

11.20. The proposed scheme will result in new jobs during the construction phases of the development.

Environmental Heritage

11.21. The proposal will bring back into use a key site within Reading Town Centre which has been derelict for approximately ten years. The proposal has been presented on several occasions to Richard Peats of Historic England who is supportive in principle of the redevelopment of the site.

11.22. The proposal will also bring back into active use three Listed Buildings on Market Place which again have been vacant for a similar period of time.

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- 11.23. The proposed scheme will ensure a sufficiently high standard of design that takes references from its context and enhances the character and appearance of the Conservation Area.
- 11.24. The scheme will provide a positive contribution to the character and appearance of the Market Place / London Road Conservation Area, the Town Hall and the Grade I Listed St Laurence Church in addition to the public realm of Town Hall Square.

High Quality Architecture

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

Sustainability

- 11.27. The proposed development will achieve a minimum BREEAM rating of 'excellent' for the commercial parts of the development.
- 11.28. The proposed development will incorporate a number of highly efficient building services and will provide a biodiverse roof to the flat roof areas of the new build element.
- 11.29. Overall, there will be a reduction in CO2 emissions for the new build elements. The proposed scheme has been designed to meet Part L of the Building Regulations.
- 11.30. The installation of a communal gas boiler system in the Friar Street building will ensure that the site is future proofed should a district heat network is established in the surrounding area.

Conclusion

- 11.31. These public benefits are considered to be in line with the NPPF's provisions as set out below:
- The NPPF at paragraph 18 states that the Government is committed to securing economic growth in order to create jobs and prosperity. This paragraph also states that planning should operate to encourage and not act as an impediment to sustainable growth;
 - Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups of the community in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities;
 - Paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of water supply and demand considerations;

Planning Statement

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



- Paragraphs 131, 132, 134 and 135 of the NPPF sets out a presumption to preserving and enhancing heritage assets including designated heritage assets. Where proposals lead to less than substantial harm to designated heritage assets, harm should be weighed against the public benefits of the proposal. In relation to non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

13. Conclusion

- 13.1. This statement has set out how the proposed development has evolved in response to pre-application feedback given by Reading Borough Council, Historic England, Ward Councillors and other key stakeholders. This statement has made an assessment of the proposed development against relevant planning policy, including the Council's Core Strategy, Detailed Sites and Specific Policies and the Reading Area Action Plan.
- 13.2. The applicant team consider that substantial public benefits will be delivered by the proposed development coming forward and it is concluded that the proposed development complies with the relevant policies within the Development Plan, in addition to other material considerations including the NPPF and Council's Supplementary Planning Guidance.
- 13.3. To summarise, the key highlights of the scheme are:
- Provision of 43 residential units in a key accessible town centre location of which 7% will be 3 bed units
 - Provision of 30% on site affordable housing units in a 70/30 split
 - Creation of a minimum of 200 no. of new jobs as a result of the level of B1 office floorspace proposed
 - Re-provision of 7 retail units to support the vitality and viability of Reading town centre
 - Re-provision of a public house to 29 - 31 Market Place
 - Retention of a public right of way through the site to connect Friar Street, Broad Street and Market Place
 - High standard of architecture and design to preserve and enhance the character and appearance of heritage assets with improvements to the special interest of the Market Place listed buildings and the Friar Street frontage
 - Overall revitalisation, investment and reinvigoration of a vacant and derelict site in Reading town centre
- 13.4. For these reasons, we would respectfully request that the application is recommended for approval by officers to recognise the significant benefits that the scheme will bring to Reading town centre.

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