



# **Planning and Heritage Statement**

**29 – 35 Station Road**

**Reading RG1 1LG**

**Andmore Planning Ltd**

**September 2016**



## Contents

|    |                                  |    |
|----|----------------------------------|----|
| 1. | Introduction .....               | 3  |
| 2. | Site Description & History ..... | 6  |
| 3. | Proposal .....                   | 9  |
| 4. | Relevant Planning Policy .....   | 12 |
| 5. | Planning Assessment.....         | 17 |
| 6. | Heritage Assets Assessment ..... | 35 |
| 7. | Conclusion .....                 | 51 |

## Appendices

|            |                                     |
|------------|-------------------------------------|
| Appendix A | Prior Approval planning ref: 141275 |
| Appendix B | Design South East Review            |
| Appendix C | Apartment Area Schedule             |

# 1. Introduction

---

1.1.1 This Planning Statement has been prepared by Andmore Planning Ltd on behalf of Titan Property Developments to accompany an application at 29 – 35 Station Road, for:

*“Demolition of existing building and erection of mixed use residential-led building providing retail on ground and first floor with 107 residential apartments above in a 23 storey building”.*

1.1.2 This application is a follows the Prior Approval for the change of use of the upper floors of the building from office to 27 residential apartments as granted by Reading Borough Council (the Council) under planning reference 141275. The ground floor did not form part of that application as it was still in use a retail at the time. Significant history prior to that application exists notably for a proposed tower of 103 flats and details are discussed later in this statement.

1.1.3 A further full planning application was submitted in November 2015 for a similar scheme by the same applicant for 110 flats which was subsequently withdrawn on 24th February 2016 under planning reference 151962 following concerns from officers. Since that time the applicant has entered into detailed pre-application discussions to further progress the scheme and revise the details to accord with prevailing policy in the context of the surrounding neighbours.

1.1.4 The proposal has developed with input from a wide consultant team and each aspect has been considered in detail in order that it makes the most positive contribution to not only Reading’s housing targets but also the immediate local area. The scheme has developed over a long period of pre-application discussions with the Council and also undergone a design review process with the Council’s own Design Review Panel (September 2016) and the previously withdrawn application was also subject to consultation with Design South East and been subject to public consultation.

1.1.5 This statement has the following format:

- Section two contains a description of the site and the surrounding area;
- Section three sets out proposed development;

- Section four outlines the relevant planning policies;
- Section five provides an assessment of the proposal against local characteristics and relevant planning policies;
- Section six provides an assessment of the heritage assets within the vicinity detailing on those most closely relevant;
- Section seven serves as a conclusion to the statement.

1.1.6 In accordance with local and national validation requirements, this application is accompanied by the following documents:

- Drawings (WCEC Architects);
- Design and Access Statement Addendum Report (WCEC Architects);
- Previous Design & Access Statement for reference (WCEC);
- Transport Statement (Crosby Transport Planning);
- Travel Plan (Crosby Transport Planning);
- Accurate Visual Representation Statement (Anderson Terzic Partnership);
- Daylighting Impact Assessment (Fabric Building Physics);
- Phase I to III Environmental Site Assessment (REC Ltd);
- Energy Statement (AES Consulting);
- BREEAM Retail Pre-assessment and sustainability checklists (AES Consulting);
- Overheating Assessment and Thermal Modelling (AES Consulting);
- Air Quality Assessment (REC Ltd);
- Archaeological Desk Based Assessment (CgMs);
- Noise and Vibration Assessment (KP Acoustics);
- Pedestrian Wind Comfort Assessment (RWDI);
- TV Signal Survey & Reception Assessment (GTech Surveys);
- Superfast Broadband Statement (Andmore Planning);
- Ecological Statement (Bridgeway);
- Ventilation Strategy (Peter Brett Associates);
- S106 Heads of Terms Note (Andmore Planning);
- Utility Records Statement (Hydrock);
- Sustainable Drainage Systems Strategy (Water Environment); and
- Confirmation the drawings can be scaled for planning purposes.

- 1.1.7 The full planning application forms are also submitted with completed Certificate of Ownership Forms together with the CIL Additional Questions Form given Reading Council adopted CIL charging from April 2015. The majority of planning obligations are now covered by CIL however a brief Heads of Terms is submitted confirming that affordable housing will need to still be secured through a S106 legal agreement.
- 1.1.8 A Financial Viability Assessment completed by Douglas Birt Consulting, has also been submitted but this is subject to Section 41/43(2) of the FOI Act and as such should not be made publicly available. The application is submitted via the Planning Portal (reference: PP-05508454) where all forms and certificates have been completed.
- 1.1.9 This application is a resubmission of the previous scheme that was withdrawn in February this year. In accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 Part 9, this application is submitted within 12 months of the date of the original application being made to the Council and it relates to development of the same character or description as the development to which the earlier application related. Therefore, this application is considered exempt from additional fees and is eligible for a free resubmission. This is confirmed through the Planning Portal.

## 2. Site Description & History

---

- 2.1.1 The site lies in the Reading Town Centre and close to the mainline railway station and bus interchange. It is a highly sustainable location with excellent accessibility, owing to its siting close to numerous modes of transport providing links to other parts of Reading and the wider area. The site sits adjacent to the Thames Tower development to the north and importantly the proposed mixed-use grouping of buildings that will form part of the town centre regeneration by Stanhope developers on Station Hill. To the south west is the residential Icon House scheme with Projection East and West which was developed as part of the mixed use hotel scheme on Friar Street and Merchants Place.
- 2.1.2 Immediately to the west is Garrard House, a building with Prior Approval for conversion to residential flats which is currently undergoing conversion. Garrard House is also owned by the applicant which includes the surface car parking area and the access road off Garrard Street. This is shown within the 'blue line' that indicates the ownership of the applicant on the submitted planning drawings.
- 2.1.3 To the east is the Grade II listed Great Western House now occupied as a Malmaison hotel. Immediately to the south is a 6/7 storey 1980s red brick bank/office building known as Brunel House. This abuts the application site and has a common party wall adjoining. Beyond that building a further heritage asset is found at 13/15 Station Road. These buildings are discussed in further detail in the assessment section of this report.
- 2.1.4 The existing building, formerly known as Union House given the previous occupants being Norwich Union was built in the 1950s and is of brick and concrete construction with metal framed windows. The building is arranged as retail on the ground floor and office on the floors above. It has been in use until earlier in the year when the last remaining tenant, a newsagents, vacated.
- 2.1.5 The site is located within the Riverside Opportunity Area and detailed in the Reading Town Centre Area Action Plan. As such a more detailed set of planning criteria apply to this site in addition to national, regional and local planning policies contained in the Development Plan.

## 2.2 Planning History

- 2.2.1 The former use of the site was for office B1(a) at the upper levels with retail on ground floor. Part of the building has been most recently use earlier in 2015 with upper floors being vacant for longer.
- 2.2.2 The most recent application for a similar scheme for 110 units was withdrawn in February this year. The main difference being the building had an additional bulk to the west of the site known as 'the backpack'. That element has been removed and no longer forms part of this scheme. Planning reference: 151962.
- 2.2.3 A previous planning application relates to the all upper floors, those being pursuant to a Prior Approval Notification application under Class J of the GPDO 2013 granted by the Council under planning reference 141275 on 3<sup>rd</sup> October 2014. That application allows the conversion of the existing office floorspace into 27 apartments retaining the retail units on the ground floor.
- 2.2.4 There have been a number of minor applications relating to the building since its construction in the 1950s such as for adverts and plant. However, given the building is proposed to be demolished the following applications are considered to be of most relevance.
- 2.2.5 The below table details the most recent planning applications.

| Planning Reference | Development Description                                                                                                                                                                                                                                    | Status                                          |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| 01/00132/FUL       | Demolition of existing buildings and redevelopment to provide new office building with retail or A3 restaurant use at ground floor level plus service area and car parking at basement/lower ground floor level.                                           | Granted with s106 17 <sup>th</sup> January 2002 |
| 04/01395/FUL       | Demolition of existing building and the erection of a 22 storey building comprising 103 residential units, two ground floor Class A1 retail and/or Class A3 restaurant units, with a basement level providing car/cycle parking spaces and refuse storage. | Granted With s106 19 <sup>th</sup> August 2005  |
| 08/00150/FUL       | Redevelopment to provide a 29 storey hotel with ancillary facilities, including a restaurant, bar, meeting rooms and conferencing facilities.                                                                                                              | Withdrawn by applicant (was to be refused)      |
| 08/01797/SCR       | Request for screening opinion relating to redevelopment of 29 - 35 Station Road, to                                                                                                                                                                        | NOT EIA Development                             |

|              |                                                                                                                                                                                                                                                                                                                                                                 |                                                |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
|              | provide a 23 storey hotel with ancillary facilities.                                                                                                                                                                                                                                                                                                            | 6 <sup>th</sup> February 2009                  |
| 09/01044/FUL | In-fill existing open redundant space to create new retail unit for A1 use.                                                                                                                                                                                                                                                                                     | Granted 14 <sup>th</sup> August 2009           |
| 10/00902/EXT | Application for an extension of the time limit for implementation of permission 04/01395/FUL for the demolition of existing building and the erection of a 22 storey building comprising 103 residential units, two ground floor Class A1 retail and/or Class A3 restaurant units, with a basement level providing car/cycle parking spaces and refuse storage. | Granted With s106 5 <sup>th</sup> January 2010 |
| 141275       | Prior Approval for conversion of office to residential to provide 27 flats.                                                                                                                                                                                                                                                                                     | Granted 3 <sup>rd</sup> October 2014           |
| 151962       | Demolition of existing building and erection of mixed use residential-led building providing retail on ground and first floor with 110 residential apartments above in a 23 storey building                                                                                                                                                                     | Withdrawn 24 <sup>th</sup> February 2016       |

2.2.6 The most recent planning application by Broadway Malyan has since lapsed earlier in 2015. However, the building massing as approved has been carefully considered and discussed in great detail with Council Officers during extended pre-application discussions. This was to ensure the height is similar to that already considered acceptable by the Council especially in light of the Station Hill scheme and the Council's aspirations for tall buildings in the town centre. Details of that application and elevations are contained within the supporting Design & Access Statement and discussed in the Planning Assessment section of this statement.

## 3. Proposal

---

- 3.1.1 This application seeks permission for a mixed use residential-led scheme comprising 107 new residential units together with replacement and enlarged retail provision on the ground and first floors totalling 310 sq m. A lower ground floor is also proposed that is accessed internally by lift and staircase to the cycle and bin stores for the residential units. There will also be plant areas for the building at this level and access is also afforded to the rear of the site onto the access road and car park to the rear of Garrard House.
- 3.1.2 Save for a limited number of disabled bays to the rear of the site the development is proposed to be 'car free'. There are 64 cycle spaces housed within the lower ground floor that is internal and secure with level access to the rear.
- 3.1.3 Communal amenity space will be provided at the top floor as an outdoor open space at the roof level of the 23<sup>rd</sup> floor. That amenity space can be made available for a limited period on completion to allow access for members of the public.

### 3.2 Proposed Units

- 3.2.1 The 110 new dwellings have been designed to provide good quality living spaces which meet the identified needs of local residents. The distribution of unit types proposed is as follows:

|                |            |
|----------------|------------|
| 1-bed 2-person | 42         |
| 2-bed 3-person | 27         |
| 2-bed 4-person | 32         |
| 3-bed 6-person | 6          |
| <b>TOTAL</b>   | <b>107</b> |

- 3.2.2 Of those it is anticipated that six of the units will be made available as Affordable Rented units and this number has been derived from a full viability assessment. Further details including floorspace and formats can be found at Appendix C of this Statement and in the accompanying Design & Access Statement.
- 3.2.3 The Council's Street Care Service have been consulted prior to the submission to confirm the number of general waste and recycling bins that are required for the scheme. The size and location of the scheme would require twice weekly collections which will be arranged by

private collection and managed by the on-site staff. Similarly the retail unit at ground and first floor, while having customer access from the Station Road level will have the ability to have further deliveries to the rear of the site. Further details of this can be found in the accompanying Transport Statement which has also been discussed at the pre-application stage with the Council's Highways Department. Accordingly the Ground Floor Plan submitted with this application shows a combined space for 11 general waste and recycling Eurobins.

- 3.2.4 Car parking spaces were not required for the Prior Approval application as the Transport Statement confirmed that the trip generation of the former office was more than the proposed residential use on the site. Given the re-provision of retail floorspace it is considered unlikely to have significant transport effect so the statement focusses on the analysis of increasing the site by 80 residential units above those 27 units already approved.
- 3.2.5 In accordance with current good practice guidance limited car parking spaces are provided for the scheme given the town centre location and proximity to the railway station and bus interchange; the scheme is otherwise "car free". This has been agreed and standard conditions and informatives preventing car permits can be imposed on any permission.
- 3.2.6 The development proposals incorporate a number of cycle parking areas across the site, with a minimum of 68 cycle parking spaces provided. This is above the minimum requirement of 57 spaces for a scheme of this scale. Further analysis of future pedestrian movements are also assessed in the statement.
- 3.2.7 The roof above the 22nd floor communal garden is proposed as a 'green roof' to provide rainwater attenuation to reduce surface water flows from the site. The roof area will also accommodate Photovoltaic solar panels and further will also be incorporated into the roof area.
- 3.2.8 Details of the amenity space is included in the Design & Access Statement and on the plans. It is expected that the amenity space on the top floor will be available to the public as a viewing platform of the far reaching views for a limited period once the development is completed. This space will be open without a roof and provide opportunity for planting of native species.
- 3.2.9 The unit mix varies throughout all the floors with the 3 bedroom units all above the 20<sup>th</sup> floor. Through considerable discussion with the Council and confirmed by the Design Review

Panel, it has been agreed that the private amenity winter gardens and Juliet balconies be removed from the scheme to improve the overall design and appearance of the building.

### **3.3 Pre-application discussions and consultation**

- 3.3.1 The proposal follows the approval of a residential tower of similar proportions and massing (Broadway Malyan). Therefore many of the impacts of a residential building on this site have already been considered acceptable such as those relating to daylighting, wind and heritage assets; however, these are assessed again below in Section 5 and also in the supporting documents.
- 3.3.2 Significant pre-application advice has been sought from Reading Council Officers and Members. A public exhibition has also been undertaken early in the design process (15<sup>th</sup> and 16<sup>th</sup> July 2015) and an independent design review by the South East Regional Design Panel (1<sup>st</sup> July 2015). A statement of Community Involvement has been submitted in support of this application. Most recently additional reports have been submitted to the Council for more formal review as a pre-application package. A Design Review Panel meeting was held at the Council offices on 15<sup>th</sup> September 2016.
- 3.3.3 Amendments to the scheme have been made throughout this process having been informed by each stage of the consultation. The external fabric in terms of materials and detailed appearance has evolved. The elevations have been revised and include an ‘all round’ design allowing each elevation to respond to its surroundings rather than having a single principal elevation. The western projection has been removed entirely so that the building is now seen as a true tall building as advised by Design South East. The building elevations have been reconfigured to reflect the verticality and elegance of the structure allowing it to stand as a distinct piece of architecture as one of Reading’s new tall buildings.
- 3.3.4 The Design Panel highlighted the guidance from CABE and English Heritage noting ‘tall buildings to give more than they take from their surroundings’. An overview of the Design Panel comments are included at Appendix B.

## 4. Relevant Planning Policy

---

4.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions are required to be made in accordance with the development plan for the area unless material considerations indicate otherwise. The statutory Development Plan for the area comprises the following:

- National Planning Policy Framework (March 2012);
- Reading Council Core Strategy (2008 and 2015 in part);
- Reading CAAP (2009);
- Station Hill South, Planning and Urban Design Brief (SPD 2007).

### 4.2 National Planning Policy Framework

4.2.1 The National Planning Policy Framework (NPPF) was published in March 2012 by the Department of Communities and Local Government. This is a new, simplified planning framework that better supports growth, helps create the homes and jobs and helps protect and enhance the natural and historic environment.

4.2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

4.2.3 The NPPF then sets out core planning principles, which should underpin both plan-making and decision-taking. These principles include (among others):

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the

country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area;

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas; and
- encourage the effective use of land by reusing land that has been previously developed (brownfield land).

4.2.4 Part 7 of the NPPF relates to “Requiring Good Design” and notes that this is a key aspect of sustainable development. It requires that Local Planning Authorities formulate policies which aim to ensure that developments “function well; optimise the potential of the site to accommodate development; reflect the identity of local surroundings and material; create safe and accessible environments; and are visually attractive as a result of good architecture”. These factors have been key in formulating the design of the proposed development, and will be explored in greater detail in Section 5.

4.2.5 Legislation relating to Heritage Assets notably listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16 and 66 of the Act place a duty on the decision maker to have special regard to the desirability of preserving listed buildings and their settings. Section 72 of the Act places similar duty on the decision maker with respect to the desirability of preserving or enhancing the character or appearance of conservation areas.

4.2.6 Paragraphs 126 to 141 of the NPPF deal with conserving and enhancing the historic environment with much emphasis on “significance” and defined in Annex 2. Further detail on the national policy relating heritage assets can be found in the Planning Assessment Section 5 below.

4.2.7 Conservation Areas were introduced by the Civic Amenities Act 1967 and are defined as areas of “special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.” The National Planning Policy Framework (NPPF) adopted in March 2012, followed similar sentiments of the now superseded Planning Policy Guidance Note 15: Planning and the Historic Environment. The NPPF Chapter 12: Conserving and Enhancing the Historic Environment, states at Paragraph 128 that:

*“Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

### **4.3 Local Planning Policy**

4.3.1 The Development Plan relevant to this site comprises the following documents:

- Core Strategy (Adopted January 2008 with alteration adopted January 2015)
- Site and Detailed Policies Document (October 2012)
- Reading Central Area Action Plan (January 2009)
- Proposals Map (December 2012)

4.3.2 Core Strategy Policy CS7 requires that new developments “must be of high design quality that maintains and enhances the character and appearance of the area in Reading in which it is located”. The policy goes on to set out a list of overarching urban design principles that developments must achieve and proposals will be assessed against. Core Strategy Policy CS4 requires that the scale and density of a development should be related to its level of accessibility. Given the site’s location within the very centre of Reading it has immediate access to excellent public transport connection as well as all facilities and amenities of the Town Centre.

4.3.3 Core Strategy Policy CS15 covers the issues of location, accessibility, density and housing mix, and each of these criteria have been heeded in formulating this proposal. As required by this policy the development represents a development of more than 70 dwellings per hectare given its highly sustainable location. Core Strategy Policy CS16 relates to the provision of affordable housing and requires that developments of 15 units or more provide 30% of those units as affordable, where this is financially viable. As such the viability of this requirement has been considered and a full assessment is submitted with this application.

4.3.4 Turning to the Site and Detailed Policies Document, Policy DM1 Adaptation to Climate Change suggests that a number of measures should be incorporated into development such that it may adapt to potential climate change. As such a full Energy Statement and Sustainability Statement have been submitted. The Sustainability statement sets out a Code for Sustainable Homes-style pre-assessment setting out the credentials of the building and

its positive contribution to the site's sustainability. The requirements of Policy DM1 Decentralised Energy have been considered in the submitted Energy Statement.

- 4.3.5 Policy DM4 requires that development does not cause a significant detrimental impact to the living environment of existing or new residential property in terms of standard planning impact criteria.
- 4.3.6 Policy DM12 relates to infrastructure work and increased traffic onto a classified road. The site is accessed for both pedestrians and vehicles from Garrard Street which is an unclassified road. The supporting Transport Statement considers the highly sustainable location in the town centre and assesses the significant increase in cycle parking provision for the scheme given the local plan policy and sustainable transport initiatives for future occupants.
- 4.3.7 Policy DM19 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. As such any potential impact of the development, as well as the sensitivity of the residential use proposed has been assessed in the accompanying Air Quality Assessment which takes account of the sites' location within an Air Quality Management Area.
- 4.3.8 The Reading Central Area Action Plan contains a number of site-specific policies for this part of Reading. The site is within the Riverside Opportunity Area where significant development potential has been identified linking the town centre to the River Thames with the new railway station hub as a focus in the north south access of the town. Tall buildings clusters are also identified in this area and recent approvals for major regeneration confirm this approach.
- 4.3.9 Policy RC1 looks to contribute towards providing a high density mix of uses in the Station Road / Friar Street area. More generally though, Policy RC5 requires that new development follow a number of urban design principles, and should of course be of a high quality. Policy RC9 deals with residential proposals specifically and relates to housing mix and residential amenity, among others. The proposed mix is set out in the next section of this Statement and in detail at Appendix C.
- 4.3.10 Tall buildings are defined as being 12 storeys or 36m of residential development. Policy RC13a Tall Buildings Cluster relates to three separate areas, the cluster of relevance is the

Station Area Cluster, having the station at the centre of the cluster to signify the status of the station area as a major mixed-use destination. Tall buildings in this area should, amongst other requirements, be located at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes.

- 4.3.11 The Sackville scheme and recent amendments to Plot E and Telecom House is currently under consideration by the Council under planning reference 151426. This seeks outline permission for a range of buildings heights from 6 storeys along Friar Street to 12 storeys on Garrard Street. That application is presented in the context of the Sackville Masterplan and notes the tallest structure still to be at Plot C to the north. Those buildings could be within the range of 109 to 128m AOD.

## 5. Planning Assessment

---

5.1.1 This full planning application is submitted following lengthy scheme development by a wide technical team to produce a high quality residential led scheme on a previously developed and sustainably located site. Numerous detailed technical surveys and assessments have been completed in accordance with the Council's validation requirements. The below sets out each aspect of the proposal and the associated Development Plan policies to which they relate.

### 5.2 Principle of Development

5.2.1 There have been previous applications on this site relating to residential schemes and most recent approval being the application for 103 flats in 2010. The change of use from office to residential has also been granted through the Prior Approval process for the use of the existing building as 27 flats above the existing retail on the ground floor. This application is a full submission considering the site within its context and importantly the evolving nature of Reading Town Centre. The recently withdrawn application raised some concerns in terms of general massing of the rear projection that would have abutted Garrard House. That in turn had impacts that the Council considered unacceptable such as in daylighting and detailed design. However, the overall height has been agreed and this is considered acceptable in the Station Tall Buildings Cluster.

5.2.2 The principle of a residential use on this site is accepted as an appropriate form of development in town centres that creates places where people can live and work in a sustainable way with all the amenities that a town centre such as Reading can offer to future occupants. This is supported by central and local government policy aims to reduce the need to travel in the NPPF and more specifically Reading's own planning policies encourage the provision of residential uses in the town centres such that truly sustainable homes are provided close to jobs and services, minimising the need to travel by private car.

5.2.3 The building, formerly the Norwich Union office, has been in use until earlier this year with retail operations on the ground floor but is now capable of conversion into residential apartments securing the site for much needed flats in the town centre. This is similar of other former officer buildings in the town centre. Most recently the Kings Point

redevelopment at Kings Road was granted permission at Committee and subject to a s106 agreement for a 17 storey residential development. The Station Hill development has now received approval of some Reserved Matters for part of their wider site. Discussions are still ongoing on the wider site and it is anticipated that this will continue for some years. However, it is agreed that those applications should not delay this submission and that this represents an important progression in Reading's town centre developments.

- 5.2.4 Reading's Core Strategy: Policy CS4 concerns sustainable development, place making and growth noting that the scale and density should relate to accessibility. The site is located moments from the mainline railway station, the bus interchange and within the town centre where walking to work as well as to local amenities is the most efficient mode. Reading town centre has been transformed significantly since the introduction of the Oracle Shopping Centre and a shift in its hierarchy as a regional centre. The town has become more popular as a destination and more recently the town centre is seen as a place where people want to live rather than simply visiting for the day and travelling back out of the centre to the more residential suburbs. This shift is supported by this application and indeed by local policy and those promoted by regeneration. The re-provision of retail is also considered policy compliant. While there is an increase in the retail floorspace, this Central Core town centre site is the preferred location for additional retail and as such a sequential test is not required.
- 5.2.5 The site being within the Station/River Major Opportunity Area (Policy RC1) and also the Tall Building Cluster (Policy RC13a) is neighboured by numerous other large scale redevelopments. This follows from the adoption of the Station Hill South- Planning and Urban Design Brief in 2007 that noted the site as being a gateway at the eastern end of Garrard Street forming a strong entrance point to the Brief area. The site is not identified specifically in the RCAAP because at the time of its adoption there was already an extant permission for its redevelopment.
- 5.2.6 The loss of office space has been assessed in the context of the significant amount of vacant office space in Reading Town Centre but also the Station Hill proposals including Thames Tower redevelopment immediately to the north of the site. It is also considered that following the move of the station's main entrance focus further west along the station that the former concourse site will come forward for future office development. It is therefore

considered that the residential need in this central location does not conflict with Policy CS11. The remainder of this Statement will examine the other key policy matters to be considered through this planning application.

### 5.3 Dwelling Mix

5.3.1 Whilst Reading has no minimum floor area standards the scheme has considered the internal space very carefully and suggested room with furniture layout can be seen on the accompanying plans. The mix of unit types has also been considered given the town centre location and the market requirement for mainly one and two bedroom units but has also considered the addition of 3-bedroomed units in accordance with RC9.

5.3.2 As such this application proposes an appropriate mix as follows:

|                |            |
|----------------|------------|
| 1-bed 2-person | 42         |
| 2-bed 3-person | 27         |
| 2-bed 4-person | 32         |
| 3-bed 6-person | 6          |
| <b>TOTAL</b>   | <b>107</b> |

5.3.3 Policy RC9 requires the provision of a mix of housing sizes, types and tenure, to meet the needs of the borough's communities. The town centre location makes this a perfect site for smaller one and two bedroom units rather than family sized three or four bedroom units which are more suited to larger sites where houses can be provided instead of only flats. However, there are six, 3-bedroom units proposed.

### 5.4 Tall Buildings and Townscape

5.4.1 Council Policy RC13a seeks a cluster of tall buildings near the railway station and this policy has been tested a number of times with recent planning applications on nearby sites. In brief, the policy seeks:

A new cluster of tall buildings with the station at its heart will signify the status of the station area as a major mixed-use destination and the main gateway to, and most accessible part of, Reading. Tall buildings in this area should:

- Be located at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes;

- Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm;
- Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms;
- Be designed to fit within a wider planning framework or master plan for the area, which allows separate parcels of land to come forward at different times in a co-ordinated manner.

5.4.2 The height of this proposal has taken reference from the approved tower on the site while also noting the Station Hill 2 development and its two outline planning permissions that included five buildings taller than this proposal. A further outline permission for the nearby site known as Station Hill 3 was granted in January 2015 with the tallest building being up to 25 commercial storeys in height (height parameter range 109 – 128m AOD). Since that permission, further applications have recently been approved, relating to part of that wider masterplan site including Telecom House. Therefore the development proposed through this application contributes directly to this key aim of the Local Plan.

5.4.3 The NPPF reminds applicants and decision-makers that good design is indivisible from good planning, attaching great importance to the design of the built environment. It is highlighted within the NPPF of the importance to plan positively to achieve high quality and inclusive design for all developments. Paragraph 58 seeks to achieve inclusive design proposals that establish a strong sense of place, and optimise the potential of the site to accommodate development.

5.4.4 In addition to the requirements of Policy RC13a for the Station Cluster the RCAAP policy goes further in subsection part v) confirming the sentiment of the NPPF and that tall buildings should be of excellent design and architectural quality. A number of points are made which this statement will consider in detail.

***Tall buildings should be located at the centre of the cluster close to the station***

5.4.5 This part of the town centre is intentionally dense in character and is being developed significantly. The Station Hill 2 or 3 to the north is now underway and the large extension to the roof of Thames Tower has also been completed with the scaffolding now being removed.

The heights of the buildings surrounding the station have already been assessed through planning applications which have in turn been designed with reference to policy.

- 5.4.6 This site can be seen from the station and its newly created open space to the south. The former concourse that still retains the station's primary retail offer is likely to come forward for redevelopment and appears likely to have the capacity to accommodate a significantly tall building that will complement the cluster albeit on its fringe similarly to this application.

***Create a coherent, attractive and sustainable cluster of buildings with a high quality of public realm***

- 5.4.7 The detailed design has been the subject of significant discussion and has evolved over the year with input from Council Officers, the public exhibition and also the views of the Design South East Panel. This site is one building of many within the cluster and the cluster continues to evolve as separate landowners come forward. The height of the building has already been set by the previous application which has in turn influenced the taller parts of the cluster at Station Hill 2 and 3.
- 5.4.8 The proposed building will cover the entirety of the site, indeed as the existing building does. Public realm improvements on site are therefore limited however, the access points, active frontages and linkages to the wider area have been carefully considered. The retail access focuses on the main north east corner and the residential entrance on the north elevation on Garrard Street. Cycle hoops will be replaced along this elevation and paving replaced in accordance with the Council's overall public realm strategy for this important junction of Station Road and Garrard Street.

***Provided space between the buildings to avoid the creation of an overly dense townscape and allow buildings to be viewed as individual forms***

- 5.4.9 As above the site is already entirely covered with buildings. The previous permission also proposed the western element of the building extending over the access road between the site and Garrard House to the west. This was, and still is, considered the most suitable form of development as it creates a lowered link transitioning between the two buildings while screening servicing and car parking for the retail and hotel operations to the rear.

5.4.10 The western projection of this application has been lowered so that the taller main element still reads as a singular tall building that stands on its own in the townscape as a distinct piece of high quality architecture. It is taller than Thames Tower intentionally yet still lower than the tallest buildings in the cluster. The scale and proportions have been realigned to provide a more slender tower rather than breaking up the taller facades into smaller elements. This creates a statement building that contributes positively to its surroundings and when viewed from farther afield will be individual and contrast with yet complement the cladding at Thames Tower.

***Fit within a wider master plan for the area and allow separate sites to come forward at different times in a co-ordinated manner***

5.4.11 This part of Reading has been developing through policy since before the Design Brief and indeed the Reading Centre Area Action Plan itself was supported by the Council's Tall Building Strategy (2007) when the cluster was first identified. The masterplan evolved with the Station Hill developments already with the knowledge of the extant permission for a 22 storey building having been approved on this site in 2005. Given the site is under one single ownership and now vacant it is anticipated that work could commence in early 2016 if approved again to similar scale by the Council. While work is already underway at Station Hill it is understood that some temporary uses for parts of the site are being explored whereby this application building could be constructed well ahead of the later phases of the neighbouring masterplan.

***Tall buildings should enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building.***

5.4.12 The building design has been through a number of previous iterations following consultation. The site is within the town's central cluster and as such this is expected to be the most dominant of the tall building clusters. However, the site is constrained significantly by its almost square dimensions on the ground and limited footprint. Effort has been made in the western projecting element to add interest to the building when viewed from the south and western angles. The eastern facade is arguably the main facade with its prominent corner facing the station and responding to listed heritage assets. The northern elevation is screened in the main by Thames Tower however far reaching views of the site will be able to appreciate the increased height and the distinct shape of the upper floors.

- 5.4.13 The building has been designed in the round where previously the southern elevation was to be left particularly sparse in appearance and articulation. The change in unit type and mix is apparent running up through the building with the upper floors having only two-bedroom units with the larger winter garden detail on the elevations. These will allow for a gradual change in the design as it reaches up to the higher levels.

***Contribute to a human scale street environment, through paying careful attention to the lower section of the building.***

- 5.4.14 The ground and first floors have retained a retail use and therefore provide an active frontage not only to Station Road but also enhance the experience on the Garrard Street frontage with additional shopfront glazing and to accord with Council's policy RC10. The residential entrance will also be provided on the Garrard Street elevation. Servicing and waste collection will occur to the rear through the undercroft between the site and Garrard House.

- 5.4.15 The first floor elevations had previously been the subject of criticism from Design South East in terms of the material choice and the lack of integration with the upper floors. As such have been amended to respond to their comments and the two retail units are provided with mezzanine areas and the northern most retail unit having two active frontages to provide a transparency to the corner and improve the setting of Garrard Street.

***Contribute to high quality views from distance, middle distance and local views.***

- 5.4.16 An Accurate Visual Representation Statement has been submitted to support the application in particular in reference to views from around the site to assess the influence of the building at distance. Further height justification has been provided in the Design & Access Statement noting the height reference taken from the previously approved scheme, albeit now lapsed, and also the heights of the buildings in the Station Hill developments.

- 5.4.17 The building is adjacent to Thames Tower which although not as tall as the proposed building is a significant structure that will dominate in short, middle and distant views given its much larger footprint and therefore bulk. That in itself does not justify the application, it merely sets a useful backdrop or indeed foreground to the proposal- either way the two buildings will be read in the same context from many views identified. The AVR Statement

has also assessed the potential bulk and height of Station Hill developments given these are considered material considerations as committed schemes.

- 5.4.18 Being within the tallest cluster the proposal needs to stand tall in its own right and the reduction of the western projection has significantly improved the overall composition of the design.

***Take account of the context within which they sit, urban grain, streetscape and local architectural style.***

- 5.4.19 The architectural design and detailing has had to consider a number of styles and materials from the local context. However it must be noted that in this part of the town centre there is no singular style or material palette having a varied use of materials dependent on the age of the building in question. For example opposite to the east is the rendered Grade II hotel, adjoin to the south is a brown brick so often used in 1980's office design and similarly dark tones in Thames Tower- although soon to become brightened through the use of modern cladding.
- 5.4.20 Brick is the predominant material of the town and has been the material chosen to clad the facades at the lower levels forming a human scale to the plinth of the proposal. The double height entrance feature to the residential flats has been designed to announce the change in use along Station Road. Having large expanses of glazing at the ground and first floors create a high quality yet simplified elegance. This is considered to be a significant improvement to the current building which is now considered bland and out dated following further discussions with the Design Review Panel. The urban grain and streetscape is difficult to alter given the building footprint utilising the site area however the pedestrian experience at the ground level has been enhanced. At the middle and upper sections of the building a revised material has been selected by the use of fibre cement cladding and further information is identified in the Design & Access Statement. These concepts are also sought through Core Strategy Policy CS7 in relation to character and high quality design.

***Avoid bulky over-dominant massing.***

- 5.4.21 Similarly to the consideration of the height, the AVR Statement identifies the building within the wider context. The massing to the western and northern elevations is very similar to the previously approved building with the main difference being the additional bulk on the

southern elevation. Hence the southern and eastern elevations with additional mass. However, that addition is not considered detrimental rather; it creates an increased integrity to the building and a stronger form.

***Preserve and where appropriate enhance the setting of conservation areas and listed buildings.***

5.4.22 The site is not within a conservation area, the nearest one being the London Street/ Market Place Conservation Area to the east of the site. The view from the Town Hall Square has been assessed as part of the AVR Statement and the highest floors of the proposal will be visible from this location. The policy aim of the Station Area Cluster is to '*signify the status of the station area as a major mixed-use destination and the main gateway to, and most accessible part of, Reading.*' The proposal provides that hierarchy of status when viewed from the south and the conservation area announcing the central cluster and acting as a marker. The landmark buildings and focal points identified in the Character Appraisal relate to the towers and entrances of the Town Hall and St Laurence's Church centred around the pedestrianised square in front. It is not considered that the proposal would detrimentally impact on those views identified especially given the focus is on the existing architectural features of those two prominent buildings. The conservation area buildings, notably those on the northern side of Friar Street will provide an important and interesting foreground to the Council's aspirations of having a Station Area Cluster. In this regard the hotel on Friar Street already provides the lower end of the tall buildings strategy within the context of the conservation area.

5.4.23 There are listed buildings adjacent such as the Great Western House (now Malmaison Hotel) and the Grade II Statue of King Edward VII on the roundabout. Further south along the terrace of Station Road is 13 – 15 Station Road. The nearest Grade II\* building is the Town Council Chamber with Clock Tower and the nearest Grade I building is St Laurence's Church and Churchyard. These are considered in more detail below in the Heritage Assets section of this report.

***Use high quality materials and finishes.***

5.4.24 Details of materials are included within the supporting Design & Access Statement and shown on the plans and elevations. Heritage England and CABI/Design Council advise in their guidance that tall buildings should give more than they take from their surroundings.

5.4.25 The South East Regional Design Panel advised that a '*simpler unified treatment*' to the facades would work better on a building with elevations of these widths. They advised that the building was not large enough to warrant having elevations being broken up to reduce perceived bulk and that '*this is a building to be seen in the round*'. The choice of materials is key to ensuring the building is successful in its verticality and as such the glazed to non-glazed elements has been revised to ensure it is of high quality finish.

***Create safe and pleasant attractive spaces around them.***

5.4.26 Residential access has been simplified and the location on the prominent Garrard Street elevation in an area where residents would not conflict with the more busy Station Road pavements and those waiting for buses. This also adds footfall to this part of the town centre which will help to ground the building on both street frontages and link into the proposed Station Hill Development. It is understood that the ground floor of Thames Tower has recently been revised and that a colonnade is now to be reinstated. The residential entrance to the application site will correspond positively to that covered area and provide interest when approaching from the north.

***Locate any car parking or servicing within or below the development.***

5.4.27 The scheme is to be 'car free' save for a limited number of disabled spaces to the rear of Garrard House which is in the same ownership as the applicant. This approach has been discussed with the Council's Highways Officers and is considered acceptable given the highly sustainable location close to the station. Servicing of the retail unit together with refuse collections will take place to the rear of the building off Garrard Street given how busy Station Road is and that it accommodates a number of bus stops to the front of the site.

5.4.28 Cycle parking is provided in the lower ground floor having level access to the rear beneath the undercroft.

***Maximise the energy efficiency in order to offset the generally energy intensive nature.***

- 5.4.29 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. In an environmental sense this means contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 5.4.30 The development minimises carbon dioxide emissions and incorporates high standards of sustainable design and construction. Standards will be achieved through a number of features as detailed in the accompanying Energy and BREEAM Retail Pre-assessment including sustainability checklists (AES Consulting). The external fabric of the proposal has been carefully calculated to ensure the scheme does not overheat in the summer months. This assessment has also been provided.
- 5.4.31 Whilst a full assessment of the sustainability features is included in the submitted Energy Statement (AES Consulting), in summary here, those incorporated into the proposed new building include:
- Photovoltaic panels for energy generation up to 15 panels provided at roof level
  - Air tight construction
  - High performance double glazing
  - Dual flush toilets
  - Thermostatic valves
  - Low energy lighting
- 5.4.32 The retail element on the ground and first floor has also been subject to a BREEAM new construction pre-assessment. The development will meet BREEAM 'Very Good' in the mandatory criteria and in certain criteria will exceed this level, some reaching 'Excellent' and others improved to 'Outstanding'. Full details of this together with the checklists and criteria are included in the AES Consulting statements.
- Mitigate any wind speed or turbulence.***
- 5.4.33 A Pedestrian Level Wind Microclimate Assessment has been completed to consider the pedestrian comfort, thoroughfares, entrances and amenity spaces both in and around the

development. An accurate model of the site within its surroundings has been made and placed within a wind tunnel for testing various scenarios.

- 5.4.34 The proposal within the existing town centre context has been compared to the baseline situation using the Lawson Comfort Criteria for those pedestrians surrounding the building. The further testing of cumulative developments has also been placed in the tunnel which considers other commitments such the extension to Thames Tower and the Station Hill developments. Thames Tower extension is now nearly complete. The Station Hill development is progressing through planning with further amendments although site set up has already commenced. The cumulative impacts of the surrounding schemes provides some shelter to the proposal and therefore calmer conditions at all locations assessed will be experienced.

***Ensure adequate levels of daylighting and sunlight are able to reach buildings and spaces within the development and to those existing residential properties.***

- 5.4.35 The development has been designed to incorporate a proportionate amount of glazing to benefit from a good amount of daylight without excessive solar gain. The amount of glazing has been influenced by the energy requirements and the balance of noise mitigation in a town centre location. Daylight penetration into deep rooms has been considered to ensure that future residents will receive more than adequate level of daylight into their homes. In accordance with paragraph 17 of the NPPF a full Daylight & Sunlight Assessment has been undertaken by Fabric Building Physics, and this is submitted with the application.
- 5.4.36 During pre-application discussions the cumulative impact on daylighting from the neighbouring schemes had been requested by the Council. Accordingly the study has been revised and new calculations made to take into account the extended Garrard House to the west and Thames Tower to the north. The extended car park at Garrard Street has also been included to ensure the impacts on the neighbouring residential properties are accurately considered and taken into account when designing the proposal. This has been the subject of independent assessment by BRE as part of the previously withdrawn scheme and most recently again as part of the detailed pre-application submission following the removal of the western backpack.

5.4.37 The Daylight & Sunlight Assessment contains comprehensive calculations, for which the resultant internal daylight assessments to the proposed habitable rooms have demonstrated that an acceptable level of compliance will be achieved with the proposed development being in place. The overall results demonstrate that the proposed development has been carefully designed to ensure that a good level of daylight is achieved.

5.4.38 Since initial designs for the tower the western element of the building has been removed in its entirety. This reduction in bulk to the rear represents a significant improvement which is an improvement over the previously approved scheme by Broadway Malyan which proposed a western projection.

***Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, noise, light glare and night-time lighting.***

5.4.39 The distances between adjacent buildings have been detailed in the Design & Access Statement and supporting documents have carefully considered the nearest properties to assess impacts in terms of noise, light outlook and privacy. As above the daylighting and sunlighting to those nearby is assessed by Fabric Building Physics taking into account the guidance from BRE.

5.4.40 The nearest residential properties are those to the south west at Icon House, Projection East and West. Surrounding the site in other directions are commercial buildings being predominantly office but also hotel and bar uses along Station Road. Immediately to the west is Garrard House with a blank end wall facing the site. It is therefore considered that the residential flats facing north in Icon House are the closest neighbours that are most likely to be impacted upon. However the proposed new building has been designed such that those impacts have been kept to a minimum and the supporting reports confirm that the resulting impacts are not considered significant.

5.4.41 In terms of privacy the rear of the building has been designed in the context of this relatively dense town centre environment acknowledging the residential windows to the south west. Those windows facing directly west closest to Icon House are in a position where they look past those neighbouring windows rather than directly at them.

***Provide managed public access to an upper floor observatory and to ground floors where appropriate.***

5.4.42 The scheme provides two roof top areas as communal amenity space for the future occupants of the development. The top floor is proposed as an internal viewing area with seating areas and shared space at the 22nd floor. The top floor can be open to the public at designated times when the development first opens. This will allow the far reaching views to be appreciated for those residents of Reading who wish to see them. This can be secured by agreement with the Council and applicant.

5.4.43 The ground and part of the first floor is proposed as two commercial units facing both Station Road and Garrard Street. The future occupier of the unit has not been confirmed; however, being on the major thoroughfare and the axis between the station and town centre it is most likely an A1 retail operations. As such it will be accessible to the public during normal opening hours.

***Ensure appropriate maintenance arrangements at the design stage.***

5.4.44 Together with the communal amenity area on the 22nd floor there is also a designated area for specialised cleaning equipment with the provision of a maintenance terrace around the perimeter. The main part of the tower will be maintained by safety secure points on the communal roof area for the connection of a rope descent system.

## **5.5 Further Material Considerations**

5.5.1 At the local level the Reading Development Management Document provides a list of detailed criteria for all new developments. As such the form, layout and design of the proposed development has been predicated on a detailed review of the opportunities and constraints of the site, with the aims of local and national policy in mind.

5.5.2 The accompanying Design & Access Statement establishes the quality of the proposed development and describes the design process taking into account consideration of issues such as local character, surrounding uses, and existing design vernacular in this part of Reading.

5.5.3 The proposal uses a simple palette of materials to harmonise with the surrounding context of Reading town centre which takes reference from the adjacent buildings. It is considered that contemporary and highly sustainable approach to the design, along with the modest palette of materials will complement local character. The use of brick for the main facades at

the lower levels takes reference from surrounding developments as well as the history of bricks in Reading. This proposal will reinstate activity in the street which has been lacking for some years until the recent construction activity in the area. The approach along Garrard Street has for many years been unappealing and felt awkward late at night. The new residential entrance to the northern elevation and then the further entrance to the redeveloped Garrard House will provide footfall and natural surveillance.

- 5.5.4 The site is highly accessible and as such the scheme is effectively a 'car free' development, save for parking spaces provided at the ground floor for disabled users. The proposed development has an excellent level of accessibility to public transport links, low or zero parking provision would be fully in accordance with national, regional and local planning policies. The former office use having ceased, the residential units would be marketed as within a car free scheme. Therefore residents would be fully aware of the parking availability prior to deciding whether to purchase a property. It is anticipated that the other spaces at the rear of Garrard House will be converted to disabled spaces for use by future occupants of the Site. This is being discussed in further detail with the Highways Department.
- 5.5.5 Following advice from Officers the application is supported by an Accurate Visual Representation Statement that has assessed the short to long views of the site from location specified by the Council. This was also a comment from the Design Review Panel given the number of tall buildings that have been approved in the town centre but also to confirm the scheme accords with the Council's approach to tall buildings within clusters.
- 5.5.6 The applicant is aware of the need to provide affordable housing in Reading and across the country as a whole. Reading's Policy CS16 requires that all new developments of over 15 units or more provide up to 30% affordable housing where viable. The NPPF provides that if a scheme cannot provide the target amount this should be informed by a full financial viability assessment which allows for a developer's profit and accounts for CIL payments.
- 5.5.7 In order to calculate the appropriate level of affordable housing or contribution resulting from the proposed development Douglas Birt Consulting have examined the policy and undertaken a full assessment of the financial inputs and projected outputs. The scheme has been calculated on a present day basis according to the assumptions outlined in the submitted Financial Viability Assessment (subject to exemption from FOI). Based on this assessment it is apparent the proposed development cannot be considered viable if the full

30% were to be provided. This takes into account the significant impact that the Council's Community Infrastructure Levy will have on the scheme which came into force in April 2015 and as such would be levied on this scheme and must be taken into account in the viability assessment. Therefore, despite not being viable at 30%, six of the units would be affordable housing and provided as 5x 1 bed units and 1x 2 bed unit as affordable rented tenure.

## **5.6 Impact on Adjoining Occupiers and Living Conditions of Future Occupiers**

- 5.6.1 The development has been designed to be sensitive to the amenity of surrounding land and buildings following a redesign to respect the local context in this part of Reading, and the existing residential community. During pre-application discussions and further advice from the Design South East review panel the rear section of the building has been removed entirely. This follows comments relating to tall buildings policy but also to reduce impact on the neighbours to the south. Local policy takes this a step further and require that development should be of a high quality and should respect and enhance the varied local character of Reading, and contribute positively to the public realm.
- 5.6.2 The scheme has also been directed by recent surveys and reports to take into account a number of townscape improvements while considering the nearest neighbours. Further in-depth analysis of the Daylighting afforded to the nearest residents to the south west has also been undertaken.
- 5.6.3 This has also been developed following a full daylight and sunlight analysis of the nearest windows to the proposal. When the 14 storey hotel-led scheme at Friar Street was proposed the residential element of the scheme to the south west of the Site was already designed to be close to its neighbours. This application does not exacerbate the situation and the Thames Tower application now under construction also had to consider daylighting and its impact on the those residents in Icon House. The use of obscured glazing and the extension of projecting columns ensures that there will be no loss of privacy to the residents in Icon House. As advised by the Council the scheme has assessed those potential impacts taking into account not only the committed schemes (Thames Tower and Station Hill) but also the application Garrard House. Although not a commitment, and not technically required, it is considered good practice to include it should the extension to Garrard House be approved.

## **5.7 Environmental Impacts**

- 5.7.1 In terms of ground conditions and contamination advice has been taken from the NPPF which provides that development on brownfield land should not result in significant harm to humans or the environment. As such a Phase 1 to 3 Environmental Site Assessment has been submitted which evaluates the contamination potential of the entire site and concludes that the likelihood of historical or current contamination on the site is low. This follows a desk top study and further intrusive investigation with core samples taken and tested. The scheme proposes additional floors to the roof of the existing building and as such will not affect the underlying ground conditions.
- 5.7.2 An Air Quality Assessment (REC Limited) has also been carried out to consider the appropriateness of additional residential accommodation on the site. The site is within an AQMA however the provision of 107 new units is considered acceptable.
- 5.7.3 A Noise Impact Assessment has been completed following noise surveys taken on site. This has been worked through with the energy and fabric first approach to the design ensuring that the proposed external materials provide adequate noise protection for future occupier from external noise.
- 5.7.4 An Energy Statement has been commissioned taking into account the guidance from the NPPF but also Reading Council Local Policies noting that the Code for Sustainable Homes assessments are no longer required but replaced by other legislation control.

## **5.8 Ecology**

- 5.8.1 A survey of the site has been undertaken following advice from the Council. The site is entirely covered by either building or hardstanding and the ecological value of the site is considered low. There were no nesting birds at the time of the survey and since that time the site has been in active use as a building site which further detracts it as being suitable for nesting birds.
- 5.8.2 The proposal for a brown roof on the top floor is seen as a positive benefit and could be suitable for foraging bird which could in the future choose to nest here. This is shown on the submitted plans and would still be suitable for nesting birds while also providing a sustainable urban drainage system and area for photovoltaics.

## **5.9 Transport**

- 5.9.1 The transport and highways aspects of the development have been considered in detail, and a Transport Statement has been completed by Crosby Transport Planning. The key transport aspect of the proposal is the sustainable location of the site, and in accordance with the NPPF Chapter 4, the development promotes sustainable transport choices. Local Policy DM12 requires that developments do not create significant transport movements which would have a harmful impact of the surrounding road network. Since the development will be largely car-free, with the exception of disabled parking spaces on the adjoining site to the rear of Garrard House, and the site is located within a highly accessible town centre location, close to regular and frequent public transport links and adjacent to extensive pedestrian and cycle networks, it is concluded that there will be no such impacts arising.
- 5.9.2 The residential refuse collection arrangements will remain largely similar as for the previous office use. Dedicated areas for bin storage and collection will be located on the lower ground floor to provide level access from the rear and refuse vehicles collecting from Garrard Street. This will prevent refuse lorries from having to use the busier Station Road which therefore prevents potential conflict with the bus stops.
- 5.9.3 The cycle storage area will accommodate a minimum of 68 cycle parking spaces in the form of two-tier Josta-style stands, thereby meeting the minimum standard requirements as set out in the Transport Assessment. These stands are located in the lower ground floor level and can be accessed directly from the rear of the site to the side of Garrard House and will therefore be secure and covered. These stands will be for the use of the whole building and future residents will be encouraged to use bicycles for both going to work and recreationally given the excellent links to the countryside cycle initiatives such as the Thames Path.
- 5.9.4 The site represents the highest level of access to public transport which demonstrates that the levels of car and cycle parking proposed on site are in accordance with policy guidance. Further detail on the difference between trip generation for office and residential uses is contained in the Transport Statement, and it is strongly concluded that the development would not give rise to any adverse transport impacts.

## 6. Heritage Assets Assessment

---

- 6.1.1 The site does not contain any designated or non-designated heritage assets however there are nearby assets which the development could be considered as being within their setting. As identified above in Section 4, national and local policies still require an assessment of heritage assets within the setting of the site and the preservation of their setting must be given considerable importance and weight. As such the following buildings have been identified for further consideration:

*Reading General Station, Statue of Edward VIII, 13 – 15 Station Road, Great Western House, Town Council Chamber, Municipal Building Art Gallery, 11 – 15 Friar Street, St Laurence's Church and Churchyard (including walls and piers), Forbury Gardens including Maiwand War Memorial, Queen Victoria Jubilee Statue, and Queen Victoria Street.*

- 6.1.2 Some of these buildings fall within the Market Place/London Street Conservation Area and require additional analysis. Furthermore the Abbey Ruins as a Scheduled Monument have also been identified as an asset requiring consideration. Each of these structures will be appropriately assessed in turn as they have been identified as within the baseline study area, that being a reasonable distance of 300m from the site. Other listed buildings have been identified within the assessment area. However as this is a dense town centre location with significant large buildings in the vicinity those assets have no visibility of the site so are considered outside the setting of the proposal. Those being:

*35 Friar Street, 147 Friar Street, 154 Friar Street, 155 Friar Street, 67/68 Broad Street, 89 Broad Street, 99 Broad Street, 106/107 Broad Street, Palmer Memorial Hall, Quadrant Walls and Railings (Greyfriars Vicarage), The Mitre Inn, 1 & 2 Market Place, 13 -16 Market Place, 23-26 Market Place, 27 & 28 Market Place, 29-31 Market Place (The Coopers Public House), 32 Market Place, 33 & 34 Market Place (Trustees Bank), 48 & 49 Market Place, 50 & 51 Market Place, 10 Forbury Road (Walter Parsons Corn Stores), The Old Vicarage Municipal Buildings, The Former Police Station & Magistrates Courts, The School of Art Municipal Buildings, Small Town Hall, Concert Hall Municipal Buildings. All noted above being Grade II Listed.*

## 6.2 Heritage assets in the setting of the site and within the Market Place Conservation Area and requiring additional analysis.

### Town Council Chamber with Clock Tower Grade II\*

#### *Architectural Description*

- 6.2.1 Built is 1872-75 by Alfred Waterhouse. French Gothic style. 2 storeys and attic. 5 storey tower. Built in red and grey brick with terracotta ornaments. Tower placed to close vistas from Friar Street and Market Place. The whole is modest in scale and surprising in its use of the local materials, uncharacteristically 'soft' for Waterhouse. Tower is over entrance lobby. Corbelled polygonal buttresses at corners with finials and steep saddle back roof. Clock below belfry screen. Pointed arch entrance with shields and date in spandrels. To left the Council Chamber, 4 bays with slight break gabled to left. Paired lights in segmental headed recesses to ground floor. Tall lancets with label moulds and polychromed tympana over 2 light double transom windows which contain Waterhouse pink grisaille glass. Roundel with arms of Borough in gable below attic window. 1 gabled dormer. To right of tower the effect altered by removal of 2nd tower following war damage. Angled round to east, 3 storeys with modillion cornice to pierced parapet. 4 bays divided by diagonal buttresses; 2 light transomed windows in segmental headed recesses.

#### *Setting*

- 6.2.2 To the north and east are the further municipal buildings of the museum gallery and concert hall forming the larger group of buildings in the setting, these are considered to be strongly positive. To the south is St Lawrence's Church also being in the Conservation Area and is strongly positive to the setting of the asset. Immediately to the west is Blagrove Street which is a busy one way street with parking bays either side abutting the asset on the eastern edge of the road. This is also used by bus services and is busy at all hours of the day, this is strongly detrimental to the setting. In recent years the thoroughfare from Blagrove Street to the Market Place has been closed off and pedestrianised with the Queen Victoria Statue (Grade II) now more strongly associated with the asset. This arrangement of new public space is positive. The building is surrounded by the Conservation Area, buildings on the opposite side of the new pedestrianised area are outside the Conservation Area and are neutral to the setting.

### *Significance and assessment of harm*

- 6.2.3 The Town Council has been present here since the construction of the building hence the importance of it being made from local materials. The building is still in use for its intentions and open to the public with access dependent on events. The social and evidential significance is therefore high with historic significance as moderate-high. The tower forms an important finishing feature in the streetscape but when viewed from the west and the south. The proposal will not appear within those views in terms of intervisibility given it is the north west of the listed building with the townscape extending between the sites. The Site will appear in a view containing the Town Council Chamber when viewed from an angle from Market Place, however, this is similar to the tall buildings of the hotels on Friar Street and indeed the extended Thames Tower and the Station Hill development beyond.

### Municipal Building Art Gallery and Museum Grade II

#### *Architectural Description*

- 6.2.4 1894 designed by a local architect (W R Howell) to fill corner between concert hall and earlier school of art (qv). Asymmetric design in Gothic style closely echoing the style of the concert hall. 2 storeys attic and basement. Dark blue brick with dark red brick and terracotta dressings. Sandstone plinth. Terracotta band over ground floor, the carved reliefs depicting history of Reading. Arcaded cornice continued right across. Projecting terracotta polygonal porch turret, heavy arcaded and decorated ground floor, gables over 1st floor windows. 3 bay gable to right matches entrance to concert hall (coped gable, poppy head saddlestone, arcaded band and polygonal corner buttresses); 2 attic lancets flanking statue of Queen Victoria in canopied niche, C13 style. 2 light and oculus windows on 1st floor, segmental headed on ground floor. Corner block polygonal, basically a projecting chamfered turret with steep saddleback roof and 3 extremely rich gabled French Renaissance dormers with C13 geometrical tracery. 1st floor blind with 3 canopied niches on corners. On ground floor 5 foiled lancets and a basement of segmental headed windows. Commemorative marble tablet on corner. Return to Valpy Street repeats Waterhouse and Lainson use of triangular section buttresses capped with pinnacles between bays. 5 bays. 1st floor blind, ground floor has 2-light and oculus pointed windows with gables over. Tiled roofs.

### *Setting*

- 6.2.5 The setting of the asset is similar to the Town Council Chamber as it forms a strong grouping of buildings. However, the building is on the junction of Blagrove Street and Valpy Street which is a busy road junction which detrimentally impacts on the setting. On the opposite corner of the junction to the north is the new build replacement office which has altered the setting further since the demolition of the former 1970s office development. The buildings forming the group are strong in their identity as civic buildings using local materials with fine detailing. The more modern buildings to the east and west on both streets neutral to the setting given the relative heights and relationship with the Municipal cluster.

### *Significance and assessment of harm*

- 6.2.6 The buildings are strong in their grouping, despite different architects and design, the style of high Victorian Gothic Revival with polychrome brickwork is characteristic of Reading at the time and the buildings are assessed as having a moderate architectural significance. This part of the Municipal Buildings is contained within a tight urban grain with similar heights of buildings surrounding it. The intervisibility with the Site is limited with only potential views from the eastern end of Valpy Street at which point the listed building is not readily perceived as it is at 90 degrees to the proposal forming the street edge. Given the location of the surrounding building the proposal is assessed as likely having a neutral impact on the setting and significance.

### St Laurence's Church and Churchyard Grade I

#### *Architectural Description*

- 6.2.7 Structure Norman to C15 with excessive restorations of 1867. Flint with ashlar quoins and dressings. Principal feature tile C15 3 stage tower closing vista to north of Market Place - crenellated parapet, octagonal chequered clasping buttresses with strings, capped by crenellation (spirelets removed); sundial to south dated 1727, main entrance to west. Tower built 1458. Tiled roofs with centre valley (nave and north aisle). 1+4 bay nave, 2 very wide chancel bays. Nave south wall has small Norman window at west end and a late C12 round headed doorway with waterleaf capitals; other openings restored Decorated style.

### *Setting*

- 6.2.8 Again forming part of the grouping of the Municipal Buildings to the north but also with the registered Forbury Gardens and Abbey Ruins to the east these are considered strongly positive to its setting given the walls extending along The Forbury (road). The Conservation Area setting is important and particularly when viewed from the south. The setting of the western end of the listed building has been improved following the pedestrianisation of the end of Friar Street. The Forbury however is strongly detrimental to the setting given the number of buses and other vehicles with the traffic calming and restricting road works in the vicinity.

*Significance and assessment of harm*

- 6.2.9 The square tower is a prominent feature on the listed building forming an important element of the Market Place Conservation Area composition. The church, particularly the tower viewed externally, is a fine example of mid-15th Century ecclesiastical architecture. The 19th Century restorations retained the appearance of predominantly flint facades with ashlar dressings that correspond with the abbey buildings to the east of the asset. Further alterations are apparent due to war damage which includes rebuilding of the western windows and the removal of the spirelets. The building is still in use as an Anglican parish church and can be assessed as having a moderate social, evidential and historical significance level with a moderate to high architectural significance. The main views of the church are those afforded from the south and west where the proposed development would not be considered directly visible of the listed building. Views of the proposal would be available from the former junction of Friar Street and Market Place although the tower of the church would be so prominent in the foreground that the proposal is not considered to be detrimental noting that the setting in that view has already been affected by modern tall buildings noted on Friar Street.

Queen Victoria Jubilee Statue Grade II

*Architectural Description*

- 6.2.10 Facing down Blagrove Street. 1857. Sculptor George Simmonds, son of one of Reading's notables. Large Carrara marble statue of the Queen Empress in commanding and appropriate attire. High plinth with moulded cornice and base on wide step which has red granite corner bollards. Inscription tablet facing Blagrove Street.

### *Setting*

- 6.2.11 Being a statue set within a pedestrianised paved area the setting is considered in the round with views afforded to it from all angles. It is also surrounded by predominantly three to four storey buildings and given the height of the statue has the back drop of the existing buildings or where these are not present the longer views along Friar Street, Blagrove Street and Market Place. Its setting has been improved and the impact of the road network diminished in recent years.

### *Significance and assessment of harm*

- 6.2.12 The statue is read at a street and pedestrian level scale rather than larger building architectural significance. While the paving of this area had reduced the impact of the road on the asset, the inclusion of tree planting, street furniture and most recently the Reading Cycle Hire scheme docking station have detrimentally harmed the asset. The social, evidential and historic significance remains although these would be considered of low significance. The proposed tower would be visible above the corner buildings on Blagrove/Friar Street junction however those buildings would still provide the backdrop to the statue and as such the harm is considered neutral.

## **6.3 Heritage assets in the setting of the site not within a Conservation Area**

Main Building of Reading General Station also now known as the Three Guineas public house is Grade II

### *Architectural Description*

- 6.3.1 1865-67, architect Mr Lane (Chief Engineer of the GWR Co). Enlargement and remodelling of I K Brunel's original station of circa 1840. Italianate details. 2 storey symmetrical main building of buff brick from Coalbrookdale with Bath stone dressings, rusticated quoins. 10 bays wide, slight break to centre 4. Frieze, moulded cornice and blocking course, the projecting centre having console brackets to the cornice and the blocking course raised as solid pediment. The ground floor of the centre break has guilloche frieze and panelled pilasters with wreath caps flanking the windows and doorways. Cornices on console brackets over 1st floor windows, with triangular and segmental pediments over those in centre break. Canopy across ground floor. Hipped slate roof, chimneys removed. Pleasant central cupola, which has round headed lights and bracket eaves to pyramidal roof with finial. Canopy extends over ground floor extensions on both sides, about 12 bays to left and 7 to right.

### *Setting*

- 6.3.2 Surrounding the building on three sides is the modern railway station buildings most recently to the west is the new concourse entrance and pedestrian bridge. That entrance dominates the listed building however was considered acceptable at the time of the application and subject to listed building consent. The street in front of the station building has been closed off and a new public square created which has a positive impact on the setting. Detrimental to the setting is the 1980's former main entrance and retail concourse to the south east. That building together with Thames Tower to the south are negative influences on the setting. The setting from the north is only perceived at the ground floor level given the presence of the platform roof abutting the main building.

### *Significance and assessment of harm*

- 6.3.3 Views from the listed building from the north, east and west are not apparent further than the immediate platform. Therefore the harm to the building from those views are removed. The intervisibility therefore only affects the front elevation as direct views of the proposal would be afforded to the south. However the setting of the listed building is read in the context of the larger massing of Thames Tower which would be in the foreground of its setting and the views to the proposal would be partial as only the north eastern corner of the proposal would be viewed from the front of the listed building. This is the same as the existing building albeit at a lower height than proposed given the footprint of the proposal in that location is the same. That corner of the existing building and its corresponding northern façade presents a negative impact to the listed buildings; whereas the proposal seeks to provide activity and modernised elevations to work alongside the neighbouring new buildings and nearby listed buildings. Thames Tower is also undergoing extensive alterations including new facades and increasing its overall height. With these facts considered the proposed development has been assessed as having a positive impact on the setting and significance of the listed station building.

### Statue of Edward VII statue on roundabout Grade II

#### *Architectural Description*

- 6.3.4 1902 to commemorate Coronation. Sculptor: George Edward Wade. Large bronze statue of the King in Coronation robes. High polished granite plinth with Ionic corner scroll balusters and re-entrant cornice.

### *Setting*

- 6.3.5 Similar to the Queen Victoria Statue this statue is considered in the round with views afforded to it from all angles. It also forms the focal point for the main road roundabout serving the northern end of Station Road and Blagrove Street. Given the height of the statue has the back drop of the existing buildings or where these are not present the longer views along Friar Street, Blagrove Street and from the new station plaza. Its setting has been improved by the closing of Station Hill and the impact of the road network diminished in recent years however the immediate setting is strongly detrimental to the statue.

### *Significance and assessment of harm*

- 6.3.6 The statue is read at a street and pedestrian level scale rather than larger building architectural significance. The numerous buses and taxis that use this part of the road network to access the station area have detrimentally harmed the asset. Despite the statue forming the roundabout when first erected there are now road signs also on the roundabout which diminish the significance architecturally. The social, evidential and historic significance remains although these would be considered of low significance. The proposed tower would still provide the backdrop to the statue when viewed from the north east but the improved appearance of the proposal will improve the setting and as such considered positive impact.

## 13 -15 Station Road Grade II

### *Architectural Description*

- 6.3.7 Probably circa 1903 and by Joseph Morris. Similar exuberant mixture of Baroque Art Nouveau and Flemish styles as Nos 17-27 (odd) qv. Very elaborate. 3 storeys and attic. Red and yellow glazed brick with terracotta enrichment to front only. Tiled roofs. 2 bays, tripartite sash windows. Bracketed oriel on 2nd floor to left. Enriched crows step gables of differing heights. Modern shop front.

### *Setting*

- 6.3.8 To the east is Station Road which a very busy thoroughfare forming the main north-south axis for the town centre. Following redistribution of the bus network a new covered bus stop and associated street furniture are now located immediately to the front of the listed building. These together with the number of buses standing in front of the building have a negative impact on the setting. Being mid-terraced the buildings both sides to north and

south are of varying age and styles; this is not uncommon and their impact is assessed as neutral.

#### *Significance and assessment of harm*

- 6.3.9 The building is not considered a rare example of its type as noted by a similar building further north on Station Road and the ground floor retail unit has removed any original features and now incorporates modern frontage and advertisements. The façade that contains the ornamentation as described above is in the same plane as the proposed development. This will not change save for the material and height, the rhythm of the street will be retained. The use of the building as retail with office above likely the same as when first constructed however its significance architecturally, socially, evidentially and historically is considered low. The impact on this significance has been assessed as neutral given the buildings between the sites in terms of intervisibility.

#### Great Western House (Malmaison Hotel) Grade II

##### *Architectural Description*

- 6.3.10 One of the 1st Railway Hotels in Britain. 1844 Italianate. 3 storeys and basement. Stucco with rusticated quoins. Ground floor channelled. 5x3 bays divided by pilasters supporting an entablature and boldly projecting modillion cornice. Glazing bar sash windows with architraves. Balustraded balcony, frieze and cornice to 1st floor windows, centre with pediment. 2nd floor windows with bracket cornice. Central projecting portico with full Doric order and paired columns. 2 bay canted extension to right in matching style. North front has central bowed 3 light bay with cornice over on ground floor. High panelled parapet over cornice. Later 4 storey extension to left with carriage entry. Moulded coping to parapet. 2+1 bays. Modern extension to south. Similarities with Royal Station Hotel at Slough suggest I K Brunel as architect or one of his assistants. Balustraded area to street with heavy balusters. Curved to station approach corner.

##### *Setting*

- 6.3.11 To the north and west are Station Road and Blagrove Road, both of which are extremely busy routes and considered to have a strong detrimental impact on its setting. To the east and south are extensions to the hotel which have affected the setting in a moderate detrimental way. In addition to the description above, the listed building also now has an

additional storey added to the roof in the form of a mansard style extension. This together with those either side have changed the scale, proportion and massing of the asset. However the prominent corner location allows a strong visible connection with the station buildings for which its use was intended.

### *Significance and assessment of harm*

- 6.3.12 Despite the extensions the listed building is still in use as a hotel to which much of the reason for listing is attributed given its strong links to the railway. The extensions result in an architectural significance at a low to moderate level with a moderate level for social, historic and evidential significance. The intervisibility between the sites has been carefully considered given they are opposite each other on the same street. In assessing the impact of the proposed development on the heritage asset it is very important to note the existing structures, the proximity and the relationship between the two. The existing building on the application site already presents a six storey structure built up to the back edge of the pavement. There are also further seventh storey structures to the rear of the building in the form of lift over-runs and stair core access towers. The blank north elevation of the existing building is considered to be a negative contributor to the surrounding streetscene and detracts from the character of the town centre.
- 6.3.13 In 2010 planning permission was granted for a 22 storey building for 103 residential units. Similarly there was also a retail unit proposed at the ground level which would have had very similar impact assessments considered acceptable in relation to the heritage assets nearby and particularly Great Western House. Therefore this application is not introducing a whole new concept of development rather it is replacement of a significantly sized building and considered to be an improvements over the previously permitted design. The additional height above the existing building is not viewed as causing any additional harm to the setting of the listed building in a similar way to that already approved and indeed also the increase in height and redesign of Thames Tower adjacent. It is important to note that the scheme does not intervene physically with any heritage asset's site or curtilage and when considered from the street elevations does not propose to encroach further into the public realm. The proposal is therefore considered to have the potential to enhance the setting of the heritage asset given the existing building could be seen as negatively impacting on it in its present form.

### 11- 15 Friar Street (North side) Grade II

#### *Architectural Description*

- 6.3.14 About mid C18. 3 storeys. 2 narrow bays. Silver grey brick headers and red brick dressings in about equal proportion. Small brick block cornice and parapet. Band at 2nd floor level. Tiled roof, modern shopfront, 1st floor windows have segmental heads and have been shortened. 2nd floor window sashes in flush moulded surrounds (upper sashes with glazing bars). Included for group value.

#### *Setting*

- 6.3.15 Located on the busy main thoroughfare acting as the east-west axis of the town, this part of Friar Street retains its activity despite the pedestrianised improvements nearby previously linking it to the Market Place. Bus routes on this section of the one-way system (heading west) dominate with numerous bus stops on the southern side of the street which is considered strongly detrimental to the setting. The group value of these building provide the setting to one another expected from a town centre terrace of shops with accommodation above.

#### *Significance and assessment of harm*

- 6.3.16 The ground floor frontages have been lost over a number of years and replaced with unsympathetic alterations although commonplace in this part of the town centre noting the uses in the area predominantly relating to night time entertainment with three of the buildings having been amalgamated to create one large bar. The significance relates to the group value of having retained the upper floor facades in an area that had seen many structures of this age demolished. Although the height of the proposal is significant in terms of the changing skyline of Reading the intervisibility is only perceived from far reaching views when the buildings would be in the foreground if viewed from the east. However this is not to the detriment of the buildings and other more prominent buildings, such as the hotels further along Friar Street play a greater part in the setting. Given the separation afforded between the buildings by those on Station Road to the rear there will be no direct views between the sites and therefore not within each other's setting.

### Forbury Gardens Registered Parks and Gardens Grade II

#### *Architectural Description*

6.3.17 The Forbury Garden lies at the north-east corner of Reading town centre, between the C12 St Lawrence's church to the west and St James' church (Pugin 1840) to the east, overlooked by Reading Gaol to the east of this. The 2ha site is largely enclosed by a low brick and flint wall, in places still punctuated by tall piers to give a castellated effect. It is bounded to the north by the dual carriageway Ring Road, to the east by the path from Abbot's Walk to St James' church and beyond this the ruined remains of the Abbey, and to the south by Abbot's Walk at the east end, becoming at the west end The Forbury which also curves north alongside the west boundary. The landform is largely level, with the prominent raised earthwork of Forbury Hill adjacent to the north boundary. The setting is urban, with St Lawrence's churchyard to the west, and views of the west end of St James' church to the east, together with views of the rebuilt Abbey gateway adjacent to the south. The remaining Abbey ruins stand to the south-east of the Garden. The ground around them, also laid out in the mid to late C19, runs down to the River Kennet to the south.

#### *Setting*

6.3.18 The gardens have retained some connectivity with some of the older buildings and uses that surround them such as to the abbey ruins, the gatehouse and St Lawrence Church. However the busy dual carriageway to the northern boundary, although separated by the garden's perimeter walling is highly detrimental. The replacement of a number of 1950s to 1970s office blocks have occurred over recent years, notably those on The Forbury and most recently the replacement of the Metal Box building to the north. Those developments were considered to have neutral impact despite their strong visible relationship.

#### *Significance and assessment of harm*

6.3.19 Some glimpses could be afforded of the proposal from areas furthest from it to the east particularly in the winter months given the larger trees at the western end of the gardens and those in the church yard adjacent. However there is significant distance and also large buildings that prevent the intervisibility being eroded such as those on Blagrove Street and especially One Valpy, the 8/9 storey office on the corner of Valpy Street and The Forbury. The significance of the gardens is strongly retained and having a social and evidential significance at a moderate to high level. This significance is not diminished by the proposed development.

### Maiwand War Memorial within Forbury Gardens Grade II

#### *Architectural Description*

- 6.3.20 1886. Sculptor George Simmonds. Casters Young and Co, Pimlico; terracotta pedestal Wheeler Bros. Kilns, solely supervised by the sculptor. 3 times life size cast iron statue of an enraged lion courant weighing 16 tons. Rectangular pilastered plinth records the names of the dead.

#### *Setting*

- 6.3.21 Similar to the setting of the gardens to which it forms one of the focal points towards the centre.

#### *Significance*

- 6.3.22 Social and historical significance remains at a high level given its intended status and reasoning as a war memorial. Its setting is more immediate with the gardens forming the context rather than any other buildings or structures.

### Queen Victoria Street Odds and evens Grade II

#### *Architectural Description*

- 6.3.23 Probably by Joseph Morris. Dutch gabled free Baroque style. 3 1/2 storeys, yellow brick and terracotta with dividing Ionic pilasters. Dentil cornice. Pilasters to dormers, broken pediments above. An elongated pattern of shallow bays to 1st and 2nd floors 4:2:1:1:1:1:3. Mullion and transom window to bays, sashes with architraves (and pediments on 1st floor) to rest. Modern shopfronts, retaining cornice to fascia and scroll brackets to pilasters, only one shop retains pre-war shopfront.

#### *Setting*

- 6.3.24 The street is well contained having retained both east and west elevations creating a streetscene as a singular whole piece of architecture. At four stories the street has the feeling of enclosure and robustness that resists interaction with the buildings at either end outside its immediate setting (Station Road and Friar Street to the north and Broad Street to the south).

### *Significance*

- 6.3.25 The architectural significance is considered high given its degree of completeness at the upper levels above ground floor where shopfronts have been inserted. Social and evidential significance is moderate to high with varying uses at ground and upper floors but generally town centre uses as would be expected. The street is not truly aligned to Station Road to the north with the axis of the two roads changing at the junction with Friar Street. However, the intervisibility at the northern end is direct as the Site can be seen when viewed from the eastern side of Queen Victoria Street. However, the other tall buildings already serve as the distant backdrop such as with Thames Tower which will be joined by the high rise developments of Station Hill. The strength of the uniformity of the heritage asset as a complete architectural composition resists impact from buildings outside the street. This part of the town centre has always comprised higher densities of buildings and at a variety of heights. The harm to this asset is considered neutral.

### Greyfriars Church Grade I

#### *Architectural Description*

- 6.3.26 Said to be the most complete surviving example of Franciscan- architecture in England, and in use again as a church. The first site (1255-59) being unsatisfactory, the present church was built 1285 plus, and ready by 1311. It served as Town Bridewell during the C18 and was only restored circa 1863 by the Borough Surveyor (W H Woodman). Built of squared knapped flints with stone plinth, dressings and buttresses. Tiled roof swept down over aisles with small vents. 3 bay nave, large transept (added to church by Woodman, probably incorrectly), chancel removed after the Reformation and east chancel arch blocked. Gable over now carries Woodman's triple arched belfry. The nave has segmental headed 3 light windows of plain decorated style and an extremely fine west window of 5 lights, decorated style with reticulated tracery. The transept has 2 bays each side of main vessel, each with plain 'Y' tracery, the north and south windows 4-light in Decorated style.

#### *Setting*

- 6.3.27 This asset is on the edge of the assessment area and has a context not related to the Site but distinct given the distances involved and the buildings between the two. Its setting is dominated by the main road network and significantly by the roundabout above the IDR and

Friar Street. The Station Hill developments will create a break in the setting yet still be set behind the recent developments on Friar Street.

#### *Significance and assessment of harm*

- 6.3.28 The architectural, historical, evidential and social significance is high with the site still being in use as intended after nearly 800 years. The proposed scheme does not seek to develop land that has a contextual significance to the church and the categories of significance would be maintained.

#### Abbey Ruins (Scheduled Monument)

##### *Architectural Description*

- 6.3.29 Reading Abbey is an excellent example of a medieval monastic complex, one of few such sites in Berkshire. The ruined abbey buildings survive well, standing almost to their original height. The complete Abbey site is well documented, both historically and archaeologically, and there is still considerable potential for the survival of archaeological material within its confines.

##### *Setting*

- 6.3.30 This Scheduled Monument is set within gardens beyond the buildings along The Forbury and Abbott's Walk. The buildings have connections to the Forbury Gardens given remains of other parts of the abbey such as the gatehouse. To the east adjoining is the Reading Prison wall which has a negative detrimental impact on its setting. Similarly to the west is the large office building built over the main abbey church also creating a negative impact.

##### *Significance*

- 6.3.31 This is a significant distance from the Site and while the historic and evidential significance is high, the proposed development would not impact unduly and is considered neutral to the Scheduled Monument.

## **6.4 Heritage Conclusion**

- 6.4.1 The above assessments of individual assets within an appropriate study area has been completed to support the submission. This is in line with the NPPF guidance of describing the significance of the assets, their setting and an assessment of the development's potential to cause harm to those assets. The proposed scheme will not develop on land that includes a

heritage asset. It will not intervene with the fabric of any listed building, the nearest being the former Great Western House (Malmaison Hotel) nor does it encroach into any curtilage of a heritage asset.

- 6.4.2 The main issue relating to this proposal and its potential for harm is the increased height of the building from 6/7 stories to 22 stories. The site is seen within the context of the other major applications for tall buildings in this part of the town centre including Thames Tower adjacent which is currently under construction and Station Hill Stanhope development to the west which now has planning permission and is being implemented. Therefore the setting and appearance of the nearest heritage assets has already been affected by these new developments and it is likely that additional height and bulk will be forthcoming when the rest of the station area is developed.
- 6.4.3 While the proposal' intended use is predominantly residential the ground floor will be retained in commercial use. The areas around the nearest heritage assets has been a mix of uses at various heights within this denser part of the town centre and the setting therefore has always comprised closely related buildings in terraces rather than standalone structures. The site is considered brownfield and the reuse of the land is in accordance with the aims of the NPPF with the external dimensions similar to the existing building.
- 6.4.4 The building has been considered against the guidance of the tall buildings policy from the Reading Central Area Action Plan and follows full planning permission granted most recently in 2010 for a building of the same height and similar massing. This is considered to be an improved design which promotes high quality design in accordance with the aspirations to regenerate this part of Reading.
- 6.4.5 Of the heritage assets identified the nearest is also the building most likely to have the greatest impact. However the existing building is of a quality that fails to positively contribute to its setting and it is there considered that the proposal will have a positive impact by improving this part of Station Road and the assets nearby. Numerous other assets have been noted in the assessment, some of which would only be viewed from far reaching views. Those views are also considered in more depth in the supporting Accurate Visual Representation document. Overall it is considered that that the proposal is likely to have a neutral impact on the setting and significance of the assets.

## 7. Conclusion

---

- 7.1.1 It has been demonstrated above that the proposed development of 107 new homes in this part of the Reading Central Area complies with local and national planning policy. Each tier of the development plan has been considered throughout the scheme development, and the proposal has been designed to accord with every aspect. The tall buildings policy has been considered in detail following advice from Council Officers and also advice from the Council's Design Review Panel and also Design South East. The application follows lengthy discussions during pre-application stages and has been through numerous design iterations most noticeably the removal of the formerly proposed 'backback' western projection previously approved by the Council.
- 7.1.2 The principle of a residential use on this site has been confirmed through the application of criteria within Class J of the 2013 Permitted Development legislation and the Council's Prior Approval granted in 2014 under planning reference 141275 for the building to be converted into 27 flats. The internal structures have already been stripped out and the conversion of the upper floors to residential could be implemented without delay albeit by retaining the existing structure which is not considered to be a positive contributor to the appearance of the town centre. Adjacent is Garrard House which is currently under the same ownership as the application site. That too is also currently being extended for residential use. The principle of additional bulk and massing to the site in the form of a tall building has also been considered acceptable by the approval of a tower on the site most recently in 2010.
- 7.1.3 All unit and room sizes have been designed to create high quality well-proportioned apartments arranged as one-, two- and three-bedroomed units in this town centre location. Communal amenity space is provided to ensure future occupiers enjoy high standards of accommodation and the top floor could be open to the public at specific times to allow the far reaching views to be appreciated. The proposal would provide much-needed market housing and the on-site provision of six affordable rented units on a currently under-used brownfield site.
- 7.1.4 The full package of technical reports and assessment which accompany the application test the proposal against the relevant policies and guidance in relating to transport and accessibility, ground conditions, daylighting, ecology, air quality, utilities, energy and

sustainability. As such the amenities of existing residential properties adjacent to the site and future residents of the development have been considered in the design of the proposal.

- 7.1.5 The NPPF and Reading Council's policies seek to ensure a sufficient stock of land to meet the future needs of residents in this part of Reading, including for good quality homes providing more housing, and, to provide social infrastructure and to contribute to the town centre's continued development. The proximity within the town centre, and given that the site is well served by public transport, provides an opportunity for a sustainable development in transport terms.
- 7.1.6 The proposal would enable the delivery of a significant and sustainable residential development within the Riverside Opportunity Area, which would make a considerable contribution towards meeting housing targets in accordance with the aims of the NPPF.
- 7.1.7 In light of the above, it is considered that the proposal accords with local and national planning policy and guidance. Therefore the determination of this application to a great extent centres on the simple statement from the Government that Councils should take a presumption in favour of sustainable development, and "approve development proposals that accord with the development plan without delay" (NPPF, para 14).

# Appendix A



**Reading**  
Borough Council  
Working better with you

**TOWN AND COUNTRY PLANNING ACT 1990**

**THE TOWN & COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT PROCEDURE) ORDER 2010**

To: Andmore Planning Ltd  
16 Old Town  
Clapham  
London  
SW4 0JY

Application No: 141275  
Application type: Office Prior Approval -  
Class J, Part 3, GPDO (2013 amendment)

**APPLICATION FOR PRIOR APPROVAL  
UNDER CLASS J, PART 3 OF SCHEDULE 2 TO THE TOWN AND COUNTRY  
PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995**

**Applicant:** Titan Properties Ltd

READING BOROUGH COUNCIL as local planning authority give notice that the prior approval of the local planning authority is **GIVEN** for the following development in accordance with the plans and supporting information submitted in connection with this application.

**Proposal:** Change of use of 29-35 Station Road (1st, 2nd, 3rd, 4th and 5th floors) from Class B1(a) (offices) to C3 (dwellinghouses) to comprise 27 flats. Prior Notification under Class J, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended).

**At:** 29-35 Station Road Reading RG1 1LG

**OTHER STATUTORY CONSENTS MAY BE REQUIRED**

Date: 3 October 2014

Head of Planning, Development  
& Regulatory Services

**Application At:** 29-35 Station Road Reading RG1 1LG

**Application No:** 141275

**Application type:** Office Prior Approval - Class J, Part 3, GPDO (2013 amendment)

The development shall be carried out in accordance with the details approved by the local planning authority as follows, unless otherwise agreed in writing by the local planning authority:

The following plans and drawings have been assessed (received 08/08/2014):

- PL-01 Existing Building Layout
- PL-02 Proposed PD Layout
- PL-03 Existing Site Location Plan
- Transport Statement
- Appendix II - Figures

**Reason:** For the avoidance of doubt and in the interests of proper planning.

### INFORMATIVES

1. The proposal meets the relevant criteria set out in Class J paragraph J.1; and the proposal is not considered to have an adverse impact in relation to transport and highways matters, contamination risks on the site; or flooding risks on the site.

2. The residential use of the building (falling within Class C3 dwellinghouses) must be begun before 30th May 2016.

3. The granting of Prior Approval relates only to the change of use of existing floorspace and land. If external alterations or extensions to the building are intended, a separate planning application is required for these works.

4. The grant of prior approval does not certify that the proposed development would be lawful within the meaning of Section 191 of the Town and Country Planning Act 1990. If you wish to obtain confirmation that the proposed development would be lawful and that no enforcement action could be taken against it, you can apply for a Certificate of Lawfulness. A fee is payable for this. Further information can be found on the Council's website:

<http://www.reading.gov.uk/residents/planning-and-building-control/PlanningApplicationService/FormsandInformation/need-for-planning-permission/>

and on the Planning Portal:

<http://www.planningportal.gov.uk/permission/next/lawfuldevelopmentcertificate>



Date: 3 October 2014



Head of Planning, Development  
& Regulatory Services



**Reading**  
Borough Council

Working better with you

5. You are advised that the development lies on the site of an historic garage, which has the potential to have caused contaminated land, and the proposed development is a sensitive land use.

Where development is proposed, the developer is responsible for ensuring that development is safe and suitable for use for the purpose for which it is intended. The developer is thus responsible for determining whether land is suitable for a particular development or can be made so by remedial action.

If any external works are to be carried out that will disturb the ground surface, or if any external amenity areas are to be provided as part of the development, then a contaminated land risk assessment will be required to ensure that future occupants are not put at undue risk from contamination.

In addition, the developers must be aware that any ground or enabling works may bring receptors into contact with the aforementioned contaminants. You may wish to satisfy yourself that the details of the construction proposals take the necessary account of the possibility of contaminants from that source.

Date: 3 October 2014



Head of Planning, Development  
& Regulatory Services

# Appendix B

CONFIDENTIAL

Richard Eatough  
Principal Planning Officer  
Reading Borough Council  
Civic Centre  
READING  
RG1 7AE

## South East Regional **Design Panel**

**Tel:** +44(0)1634 401166 **Fax:** +44(0)1634 403302

the **architecture** centre  
Historic Dockyard  
Chatham  
Kent  
ME4 4TZ

14 July 2015

Email: [info@kentarchitecture.co.uk](mailto:info@kentarchitecture.co.uk)  
[www.architecturecentre.org](http://www.architecturecentre.org)

Dear Richard

### **Union Tower, 29-35 Station Road, Reading, RG1 1LG**

Thank you for asking the Berkshire Design Review Panel to review the above project. We were grateful to WCEC Architects for their presentation at our meeting on 1 July 2015 and we were pleased that Titan Developments took part. It was useful to have comments from you on behalf of Reading Borough Council and we should also like to thank the Council for hosting the meeting. The Panel found it helpful to see the site and its context before the meeting.

#### **SUMMARY**

The Panel accepts the suitability of this site for a tall building. Such a scheme would need to offer exceptional architecture but the Panel is not convinced that the required quality has been achieved as yet. In our view the design falls short of the published guidance from CABI and English Heritage which calls for tall buildings to give more than they take from their surroundings. We believe further design work needs to be done before the proposal could be supported.

We would like to offer the following comments.

#### **BACKGROUND AND CONTEXT**

The site is in central Reading in a location that is very well served by public transport, being almost opposite Reading Station and close to bus stops; it is a short walk from Reading's main shopping streets via Station Road, the main route between the station and the town centre.

The site is opposite the Malmaison Hotel (Great Western House, Grade II Listed) across Station Road, and the Edward VII statue, also listed, is just to the north-east. The nearest part of the site is approximately 100 metres from the Market Place/London Street Conservation Area's northern extent on Blagrove Street.

To the north, across Garrard Street, is Thames Tower, currently being enlarged from 11 to 15 storeys and re-clad. To the south is Brunel House, a 1960s six-storey office building.

The site is flanked by Garrard House to the west, now in the same ownership as the site. Garrard House, a 1980s six-storey office block, currently vacant, has planning permission as an apart-hotel and is being converted to residential via office prior approval at the moment. There are also separate pending applications for re-fenestration/façade alterations and roof extensions.

Off Garrard Street, separating Garrard House from the site, is a rear access road leading to flats to the rear of the Novotel/Ibis Hotel complex on Friar Street.

The site has a long planning history, with various schemes that have not come to fruition. One was for a 22-storey residential tower, granted in 2005, renewed in 2011, but lapsed in 2014. A proposal for a taller, bulkier hotel was withdrawn.

There are a number of tall buildings already in central Reading and outline permission has been granted this year in Station Hill 3 for a commercial building of approximately 25 storeys.

#### PRINCIPLE

There are clear planning policy gains from concentrating new development round a major transport hub and the site falls in an area identified by the Council where tall buildings would be appropriate. The Panel has no difficulty with a tall building here in principle. We support residential use (retail on the ground floor).

The current building on the site has little architectural merit, has been vacant for a while and so detracts from this important town centre site. An appropriate scheme of exceptional quality would help upgrade and enliven the area.

The Panel is not in a position to comment on how a tall building here would take its place in the cluster of such structures in the town centre since we were not shown how it would appear in long views. We commend the efforts the Council are making to realise a considered cluster (rather than the random occurrence of tall buildings not unknown in some English cities and towns) and we note that they see this scheme as potentially a 'supporting height' building to the central tall building cluster.

#### MASSING AND HEIGHT

We felt handicapped by the lack of a physical model, certain key sections and the absence at the session (though work is in hand) of sunlight and daylight studies (which should be a design tool, not a test after design work). Both would have helped us assess the scheme more thoroughly in relation to nearby buildings. The impact of the scheme on flats to the rear of the hotel particularly needs to be analysed. Our comments are thus on the basis of the material we were shown.

The Panel found the junction with Garrard House uncomfortable. The simplicity of the profile is marred by the 'backpack' element to the west which would be a substantial building in its own right. We think the overall composition would work better if the

'backpack' was scaled down nearer to the height of Garrard House, or even omitted from the design altogether. This would allow the tower to become its own elegant object, and it would ease the impact on buildings behind.

We'd encourage the design team in any case to look again at the enormous service aperture leading from Gerard Street that bids to undermine the quality of the whole scheme. It would be worth checking what vehicles of what size need access and to ensure that it is no bigger than it has to be. There needs to be safe and welcoming pedestrian access, perhaps a shared surface rather than a standard access road.

#### ELEVATIONAL TREATMENT

We would support balconies, recessed not projecting, to the flats to give a more sculptured feel to the tower. In our view, the design should be strong enough to accept balconies (and some clutter on them).

We found it hard to see that the elevations expressed the floor plans of the tower and therefore the design proposals lack integrity. We ask that the plans and elevations be married; one or both has to change to fit the other, with both subject to the same clear organisation and clarity of purpose to provide a convincing and holistic architectural narrative.

It seems to us that the south elevation is receiving less attention than the others, yet this is the face to the town centre – and offers, one would imagine, the best views out and prime value. All four elevations should be designed to the same level; this is a building to be seen in the round.

While the intentions to enhance the building's verticality and add further visual interest are understood, the desire to differentiate a strip on the Station Road elevation of the tower puzzled us. It is not so large a building as to need to be broken up. We'd prefer to see a simpler unified treatment, or a convincing design development that imbues a logic in the plan, elevation and architectural form that would justify the proposed elevational vertical division.

Differentiating the top of the tower is not yet successful in the Panel's view. The top section is too large to be a cap and the horizontal banding as currently shown conflicts with the aim of emphasising the verticality of the building. This section might be reduced in height and the tower might feature stronger elements running from base to top to unify the design. It should be consistent all round, rather than allowing the strip (if there is one) to run to the top on some elevations.

The design of the base calls for particularly careful consideration as the manner in which towers meet the ground is crucial to their success. We caution the use of chamfers, particularly where they lead to an inclined surface that would be difficult to maintain. It would help ground the building if there were only vertical planes; the temptation to chamfer should be resisted. A simple flow of elements to the ground has much to commend it and gives visual reassurance of the base bearing the weight above. Something additional that we would be able to support would be to enter into a subtle dialogue with the listed hotel opposite. We'd also like to see consideration of how the

horizontal band at 10 metres relates to the smaller buildings to the south through cross-sections as well as assessment of eye-level views along Station Road.

The more we seek to simplify the building's design and composition, the greater is the reliance on choice of material and high quality detailing for the success of the project. Salting on the sample brick slip presented was not reassuring and we would suggest the design team produce test panels to help the assessment of colour, finish and texture of the preferred materials in situ. And we need to be sure that the panel architecture implied by brick slips will work well.

Notwithstanding our numerous points, we do consider the elevations promising and we hope that a good scheme could be achieved with some further work.

#### PUBLIC REALM AND MOVEMENT

The quantity of public realm involved here may be tiny but then all the more reason to make it of high quality. Garrard Street and the access off it should not get lower quality than a scheme on Station Road would have.

It seems unfortunate that the entrance to the affordable units is tucked away at the rear, accessed only from the service entrance, while other residents may enter from the main streets. Such social demarcation is hard to swallow and we urge the design team to switch to a single entrance and a more generous lobby. It would assist considerably if the sub-station which mars the street elevation could be relocated.

#### SUSTAINABILITY

The Panel did not sense that sustainability had been to the fore in the design concept. The intended BREEAM 'very good' standard is a minimum that a scheme of this ambition should seek. We think that your Council could justifiably press for 'excellent'.

We support zero parking. Cycle parking provision is welcome, though may need to be larger than currently shown.

Amenity space is seriously deficient. Balconies would help, but not resolve the issue. A lower 'backpack' might mean there could be a satisfactory roof garden (at a higher level, winds and downdraughts would diminish comfort). Better still would be to exploit the happy conjunction of ownerships to solve the problem perhaps by utilising the potential of the Garrard St roof levels for a generous communal amenity space for residents.

Finally, as the design of the tower is worked up we feel the design team should be afforded the leeway required to help them realise a scheme of the right quality to win consent for a tall building and to raise standards in the town - the brief as it stands is asking a good deal of a small and complex site. The Panel was not against a marginal increase in height of the tower, subject to design development and a convincing case being made, since this would potentially allow the building edge, particularly on the south side, to retreat from the boundary and allow an appropriate architectural resolution to be achieved. Such a move would have to be assessed in the context of the 'supporting height' role in the cluster referred to above.

Please keep the Panel in touch with further progress and do contact me if there are any matters raised here that require clarification.

We look forward to seeing how the project develops.

Yours sincerely,



pp

ROBERT OFFORD  
Panel Manager

Cc Timothy Cantell, Design South East  
Richard Eatough, Reading Borough Council  
Lynette Baker, Reading Borough Council  
Stephen Birrell, Andmore Planning Ltd  
David Billington, WCEC Architects  
Steve Summers, Titan Property Developments  
Tim Bull, Titan Property Ltd

Panel members present: Keith Williams (Chair), Jane Dann, Wayne Head,  
Dieter Kleiner, Richard Portchmouth

Timothy Cantell, Design South East

*This review was commissioned by Titan Property Development Ltd & CCL 3 Develco Ltd with the knowledge of Reading Borough Council.*

**CONFIDENTIALITY**

*Since the scheme was not the subject of a planning application when it came to the Panel, this letter is offered in confidence to the addressee and those listed as being sent copies. There is no objection to the letter being shared within respective practices/organisations. SERDP reserves the right to make the guidance known should the views contained in this letter be made public in whole or in part (either accurately or inaccurately). Unless previously agreed to remain confidential, this letter will be publicly available if the scheme becomes the subject of a planning application and to any public inquiry concerning the scheme. SERDP also reserves the right to make guidance available to another design review panel should the scheme go before them. If you do not require this letter to be kept confidential, please let us know.*

# Appendix C

| Floor           | Unit | Format | Area (sq m) |
|-----------------|------|--------|-------------|
| 2 <sup>nd</sup> | 1    | 2b/3p  | 57          |
|                 | 2    | 1b/2p  | 51          |
|                 | 3    | 1b/2p  | 48          |
|                 | 4    | 1b/2p  | 45          |
|                 | 5    | 1b/2p  | 41          |
|                 | 6    | 1b/2p  | 41          |
| 3 <sup>rd</sup> | 7    | 2b/3p  | 57          |
|                 | 8    | 1b/2p  | 51          |
|                 | 9    | 1b/2p  | 48          |
|                 | 10   | 1b/2p  | 45          |
|                 | 11   | 1b/2p  | 41          |
|                 | 12   | 1b/2p  | 41          |
| 4 <sup>th</sup> | 13   | 2b/3p  | 57          |
|                 | 14   | 1b/2p  | 51          |
|                 | 15   | 1b/2p  | 48          |
|                 | 16   | 1b/2p  | 41          |
|                 | 17   | 1b/2p  | 41          |
|                 | 18   | 1b/2p  | 57          |
| 5 <sup>th</sup> | 19   | 2b/3p  | 51          |
|                 | 20   | 1b/2p  | 48          |
|                 | 21   | 1b/2p  | 45          |
|                 | 22   | 1b/2p  | 41          |
|                 | 23   | 1b/2p  | 41          |
|                 | 24   | 1b/2p  | 57          |
| 6 <sup>th</sup> | 25   | 2b/3p  | 57          |
|                 | 26   | 1b/2p  | 51          |
|                 | 27   | 1b/2p  | 48          |
|                 | 28   | 1b/2p  | 45          |
|                 | 29   | 1b/2p  | 41          |
|                 | 30   | 1b/2p  | 41          |
| 7 <sup>th</sup> | 31   | 2b/3p  | 57          |
|                 | 32   | 2b/4p  | 64          |
|                 | 33   | 2b/4p  | 77          |
|                 | 34   | 1b/2p  | 50          |
|                 | 35   | 1b/2p  | 41          |

|                  |    |       |    |
|------------------|----|-------|----|
| 8 <sup>th</sup>  | 36 | 2b/3p | 57 |
|                  | 37 | 2b/4p | 64 |
|                  | 38 | 2b/4p | 77 |
|                  | 39 | 1b/2p | 50 |
|                  | 40 | 1b/2p | 41 |
| 9 <sup>th</sup>  | 41 | 2b/3p | 57 |
|                  | 42 | 2b/4p | 64 |
|                  | 43 | 2b/4p | 77 |
|                  | 44 | 1b/2p | 50 |
|                  | 45 | 1b/2p | 41 |
| 10 <sup>th</sup> | 46 | 2b/3p | 57 |
|                  | 47 | 2b/4p | 64 |
|                  | 48 | 2b/4p | 77 |
|                  | 49 | 1b/2p | 50 |
|                  | 50 | 1b/2p | 41 |
| 11 <sup>th</sup> | 51 | 2b/3p | 57 |
|                  | 52 | 2b/4p | 63 |
|                  | 53 | 2b/4p | 69 |
|                  | 54 | 2b/3p | 60 |
|                  | 55 | 1b/2p | 41 |
| 12 <sup>th</sup> | 56 | 2b/3p | 57 |
|                  | 57 | 2b/4p | 63 |
|                  | 58 | 2b/4p | 69 |
|                  | 59 | 2b/3p | 60 |
|                  | 60 | 1b/2p | 41 |
| 13 <sup>th</sup> | 61 | 2b/3p | 57 |
|                  | 62 | 2b/4p | 63 |
|                  | 63 | 2b/4p | 69 |
|                  | 64 | 2b/3p | 60 |
|                  | 65 | 1b/2p | 41 |
| 14 <sup>th</sup> | 66 | 2b/3p | 57 |
|                  | 67 | 2b/4p | 63 |
|                  | 68 | 2b/4p | 69 |
|                  | 69 | 2b/3p | 60 |
|                  | 70 | 1b/2p | 41 |
| 15 <sup>th</sup> | 71 | 2b/3p | 57 |
|                  | 72 | 2b/4p | 63 |
|                  | 73 | 2b/4p | 69 |
|                  | 74 | 2b/3p | 60 |
|                  | 75 | 1b/2p | 41 |

|                  |     |       |    |
|------------------|-----|-------|----|
| 16 <sup>th</sup> | 76  | 2b/3p | 57 |
|                  | 77  | 2b/4p | 63 |
|                  | 78  | 2b/4p | 69 |
|                  | 79  | 2b/3p | 60 |
|                  | 80  | 1b/2p | 41 |
| 17 <sup>th</sup> | 81  | 2b/3p | 57 |
|                  | 82  | 2b/4p | 63 |
|                  | 83  | 2b/4p | 69 |
|                  | 84  | 2b/3p | 60 |
|                  | 85  | 1b/2p | 41 |
| 18 <sup>th</sup> | 86  | 2b/3p | 57 |
|                  | 87  | 2b/4p | 63 |
|                  | 88  | 2b/4p | 69 |
|                  | 89  | 2b/3p | 60 |
|                  | 90  | 1b/2p | 41 |
| 19 <sup>th</sup> | 91  | 2b/3p | 57 |
|                  | 92  | 2b/4p | 63 |
|                  | 93  | 2b/4p | 69 |
|                  | 94  | 2b/3p | 60 |
|                  | 95  | 1b/2p | 41 |
| 20 <sup>th</sup> | 96  | 2b/4p | 65 |
|                  | 97  | 2b/4p | 63 |
|                  | 98  | 3b/5p | 81 |
|                  | 99  | 3b/5p | 83 |
| 21 <sup>st</sup> | 100 | 2b/4p | 65 |
|                  | 101 | 2b/4p | 63 |
|                  | 102 | 3b/5p | 81 |
|                  | 103 | 3b/5p | 83 |
| 22 <sup>nd</sup> | 104 | 2b/4p | 65 |
|                  | 105 | 2b/4p | 63 |
|                  | 106 | 3b/5p | 81 |
|                  | 107 | 3b/5p | 83 |