Land at 52-55 Friar Street
& 12 Greyfriars Road, Reading

Planning Statement

Prepared by Barton Willmore LLP on behalf of

Aviva Investors

November 2016

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1.0 INTRODUCTION

1.1 This planning statement has been prepared by Barton Willmore LLP on behalf of CIP Property (AIPT) Limited (Aviva Investors) ("the applicant") to be submitted in support of a planning application for the redevelopment of the site at 52-55 Friar Street and 12 Greyfriars Road, Reading ("the site").

1.2 The purpose of this planning statement is to describe the proposed development and to demonstrate how it accords with National and Local Planning Policy Guidance. The statement also provides a review of recent pre-application discussions with officers and a review of recent planning applications in the area, to set the context for the scheme.

1.3 This statement provides information to support and justify the proposals and is structured as follows:

- Section 2 – Description of the site, surroundings and planning history;
- Section 3 – Details of the proposed development;
- Section 4 – Planning policy context;
- Section 5 – Assessment of relevant planning issues;
- Section 6 – Assessment of relevant planning issues;
- Section 7 – Summary and conclusions.

Aspirations for the site

1.4 The applicant's objective for the site is to secure a full planning permission for its redevelopment, reflecting that their tenant, Sainsbury's, lease expires in 2017 and that the site, in its present form, is not achieving its maximum beneficial development potential.

Proposed Scheme

1.5 A full planning application is submitted for a mixed use redevelopment. The approach is to develop a courtyard scheme, with the footprint of the proposed scheme facing the perimeter of the site. Active ground floor uses are proposed (retail, leisure and offices) with residential development in the form of apartments on the upper floors. Reflecting its context the proposed building ranges in height

from seven to ten stories. An element of basement/undercroft car parking is provided, reflecting the site's topography.

Pre-application Discussions

1.6 A number of pre-application meetings have been held with Reading Borough Council (RBC) to discuss the scheme proposals. A first meeting was held on 23rd November 2015 to discuss the principle of development and inform the Council on the applicant's intentions for redevelopment. The LPA was supportive to the principle of redevelopment.

1.7 Having further progressed the detailed design for the redevelopment, a second pre-application meeting was held on 25th July 2016. RBC provided a formal written pre-application response supporting the proposals. A separate discussion between the project architects and RBC's Crime Prevention Design Advisor at Thames Valley Police has also informed the scheme.

Environmental Impact Assessment Screening

1.8 A request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted by the applicant on 5th October 2017. It was confirmed in a letter dated 17th November 2016 from RBC that an EIA is not required.

Other Supporting Information

1.9 In addition to the application forms and certificates, a number of documents are submitted in support of the planning application where further information can be found. These documents were agreed by officers in their pre-application letter and are summarised below:

- Drawings and Illustrative Material;
- Design and Access Statement, which includes details on materials and proposed lighting;
- Supporting Planning Statement – including statement on community consultation and affordable housing provision (this document);
- Archaeological Assessment;
- Daylight/Sunlight Assessment;
- Energy Statement (includes a Utilities Statement and Broadband Statement);

- Flood Risk Assessment;
- Air Quality Assessment;
- Drainage Assessment;
- Noise and Vibration Statement;
- Transport Assessment;
- Sustainability Statement including BREEAM pre-assessment and BRE home quality assessment;
- Heritage Statement;
- Biodiversity/Ecology Statement;
- Landscape Statement – including reference to open space and surrounding landscape;
- Desktop Microclimate Statement; and
- CIL Additional Information Form.

2.0 APPLICATION SITE AND SURROUNDINGS

2.1 The application site extends to approximately 0.26 hectares. The site comprises a building built in circa 1965 to accommodate a Sainsbury's foodstore and related servicing, storage and office accommodation, with the building fronting onto both 52-55 Friar Street and 12 Greyfriars Road. A site location plan is provided as **Appendix 1**.

Planning History

2.2 The planning history for the site relates to the modifications and requirements by the occupier of the building and is set out below:

Table 1: Planning History

Planning Reference	Description of Development.	Date	Decision
050462	Installation of new plant on roof.	16/11/2005	Permitted
050831	Installation of a new ATM and relocation of existing exit door to front elevation.	16/11/2005	Permitted
050752	Replacement of existing finger sign below canopy with enlarged illuminated metallic finished finger sign.	14/11/2005	Permitted
051154	Modifications to front entrance including new glazed screen and installation of metal fencing with gate to back elevation.	21/10/2005	Permitted
051273	Replacement of existing signage with illuminated signage and installation of wall and banner signage to front elevation.	13/10/2005	Split decision
051285	Replacement of existing signage with illuminated signage and installation of new illuminated wall signage to front elevation.	6/10/2005	Permitted
980125	Installation of additional cooling units on the roof of the building.	10/06/1998	Permitted

Surrounding development

2.3 The recently completed Central Studios student accommodation is located directly adjacent and to the west of the application site.

2.4 To the east of the site lies Telecom House, which was granted outline planning permission for a mixed use redevelopment in July 2016. The approval is for a series of 'Development Parameters' that reserved matters must respect. The permitted scheme (application reference: 151426) is for mixed use redevelopment of Plot E of the Station Hill site and neighbouring Telecom House site (48-51 Friar Street and 4 to 20 Garrard House) to comprise the demolition of existing buildings and erection of new buildings/structures to provide residential units, a range of town centre uses, including retail and related uses (Use Class A1-A5), associated infrastructure, public realm works and ancillary development.

2.5 The majority of Station Hill development lies to the north east of the application site. Outline planning permission was granted in 2015 for the demolition of existing buildings and erection of new buildings/structures to provide residential units, a range of town centres uses including retail and related use (Use Class A1-A5), associated infrastructure, public realm works and ancillary development. The Station Hill scheme is very large and, once complete, will fundamentally change the street pattern, character, density, and skyline of central Reading.

3.0 THE APPLICATION PROPOSAL

3.1 The planning application is seeking detailed consent for the following:

> *"Demolition of existing building and erection of new buildings to provide 137 residential units, commercial and retail use (Use Class A1-A5, B1(a) (offices) & D2 (gym only)) on the ground floor, with associated access, car parking, servicing, landscaping and engineering works".*

3.2 The existing site provides approximately 2,086sqm (GEA) of Class A1 floorspace, used as food retail store (Sainsbury's), with ancillary offices and staff facilities on the upper levels.

Quantum of Development

3.3 The development proposal comprises 137 residential units split across three (linked) buildings of between seven and ten storeys, above street level. A layout plan prepared by LDA is provided as **Appendix 2**. The proposed scheme is laid out as follows:

- Building A fronts onto Greyfriars Road and proposes approximately 120 sq. m of commercial floorspace (B1/D2 use) on street level with 44 residential units above.
- Building B lies on the eastern side of the site and runs parallel to the eastern boundary, adjoining the recently approved Telecom House site (see above). The scheme proposes 73 residential units facing internally into the proposed courtyard.
- Building C fronts onto Friar Street and proposes 540 sq. m of retail floorspace on the ground floor (potentially for the re-provision of the foodstore – subject to commercial agreement), with 20 residential units proposed above.
- The basement of the development will be accessed from Greyfriars Road and proposes cycle and car parking provision for both residents and users of the commercial units, along with refuse storage etc.

3.4 The scheme details are set out in Table 2 and 3 overleaf.

Table 2: Proposed Residential Floorspace

Unit Type	Number	Percentage
Studio	1	1%
1 bedroom flat	60	44%
2 bedroom flat	69	50%
3 bedroom flat	7	5%
Total	**137**	**100%**

Table 3: Proposed Commercial Floorspace

A1- A5 Retail	540 sq. m
A1-A5 Retail/B1(a) Office/D2 Gymnasium	120 sq. m
Total	**660 sq. m**

Design

3.5 The development proposes a perimeter block layout approach which seeks to have regard to the neighbouring proposals and the adjacent development in terms of height, scale, massing and materials. The development also seeks to orientate in such a way as to optimise daylight and sunlight with the creation of a private residential courtyard.

Transport

3.6 The development will front onto both Friar Street and Greyfriars Road. On Friar Street, there will be separate pedestrian entrances for the A1-A5 retail unit and the residential block above the retail unit.

3.7 The development will provide a vehicle entrance to the loading bay and basement car park as well as pedestrian entrances to the commercial/employment unit and a ramped access to the courtyard within the centre of the development from Greyfriars Road.

3.8 The scheme proposes 22 car parking spaces (17 disabled and 5 standard) to be provided within the basement car park for the use of residents and staff of the commercial unit. No visitor parking will be provided.

3.9 Residential cycle parking will be provided in secure cycle stores on the basement and ground floors and will cater for 108 cycles, which exceeds the minimum

required provision of 72 cycle parking spaces. Cycle stores will provide a combination of Sheffield-type stands and double stacking stands.

3.10 A Transport Statement has been prepared to accompany this application and reflects pre-application discussions held with Reading Borough Council's Highways Department.

Sustainability and Energy

3.11 The proposed development has a number of key sustainability benefits that include using previously developed land and providing high quality residential and commercial scheme in an area with excellent access to public transport. The measures described in the accompanying Sustainability Statement outline the general strategy for achieving required objectives.

Daylight & Sunlight

3.12 A Daylight & Sunlight Assessment has been completed and accompanies the application. The report identifies that the proposed development will have no adverse effects on the student accommodation directly adjacent to the proposed developments.

3.13 The report highlights that a high level of daylight and sunlight amenity would be achieved for future occupants. The degree of compliance is considered consistent with the site location and orientation, having regard for the need to provide private amenity space.

Flood Risk

3.14 The site is located in Flood Zone 1, where all development is appropriate. The applicant has prepared a Flood Risk Assessment and a Sustainable Urban Drainage System to identify measures to reduce the flow into the public sewer.

CIL and Section 106 Heads of Terms

3.15 Reading Borough Council introduced its CIL charging schedule in April 2015. The whole of the floorspace of the existing building is anticipated to be deducted from the calculations of CIL. Under Regulation 40 of the CIL regulations, the existing

building has been in lawful use for a continuous period of at least six months within the period of three years prior to the anticipated date of planning permission.

3.16 The residential floorspace is liable to CIL at a rate of £120 per sq. m and the B1 office floorspace at a rate of £30 per sq. m, with the retail and ancillary uses proposed not subject to CIL. Accompanying the planning submission is further information to inform the approach to CIL.

3.17 The applicant is prepared to enter into discussions with RBC on the potential requirements of Section 106 Agreement, where these can be justified. Negotiations will be ongoing in parallel with the determination of the planning application.

4.0 PLANNING POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant Development Plan, unless material considerations indicate otherwise. The planning application will therefore need to be considered against the following policy documents:

- National Planning Policy Framework (NPPF) (March 2012);
- Reading Borough Council Core Strategy (2008);
- Site and Detailed Policies Document (2012);
- Reading Central Area Action Plan (RCAAP) (2009); and
- Other supplementary Planning Guidance/Documents (listed below).

National Policy – National Planning Policy Framework (March 2012)

4.2 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The framework confirms that proposals that accord with up to date local plans should be approved. Paragraph 14 states that there is a 'presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking'.

Reading Borough Council Core Strategy (Adopted in 2008, Altered in 2015)

4.3 The Reading Borough Council Core Strategy sets out the adopted planning strategy for the Borough and provides a framework for accommodating the anticipated growth of Reading.

4.4 According to the Council's policy documents, the site is shown to fall within, Reading Central Area, Central Core, an Office Core Area, Primary Shopping Area, area of Archaeological Potential, an Air Quality Management Area. A cycle route is shown outside of the site. As detailed below, the site is also designated within the AAP as being within the Station River Major Opportunity Area.

4.5 The following policies are of relevance in the determination of these proposals:

Policy CS1 states that proposals for new buildings and the redevelopment of existing stock, will be acceptable where design of buildings and site layouts

incorporate energy, water, minerals, materials and other natural resources appropriately, efficiently and with care.

Policy CS7 states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Applications, including minor ones, should be accompanied by a Design and Access Statement.

Policy CS24 states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.

Policy CS25 states that major retail and main town centre leisure and culture development will take place in, or as an extension to, the centre of Reading.

Policy CS29 states that all new development should make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space.

Sites and Detailed Policies Document (SDPD) (Adopted in 2012, Altered in 2015)

4.6 This document sets out detailed policies for use in decisions on planning applications and identifies sites for development and protection. The specific policies form part of the development plan for the purpose of determining planning applications. In accordance with the NPPF, Policy SD1 applies a presumption in favour of sustainable development, stating that:

> ***"A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework…Planning applications that accord with the development plan (including, where relevant, with policies in neighbouring plans) will be approved without delay, unless material considerations indicate otherwise…"***

Reading Central Area Action Plan (RCAAP) (2009)

4.7 The RCAAP consists of different elements, which together form a comprehensive basis for managing change in the Central Area of Reading up to 2026.

4.8 The RCAAP envisages Reading becoming a 'dynamic and creative core of the capital of the Thames Valley and an important regional hub' (3.1). The centre is expected to provide a high quality, safe environment with a range of services.

4.9 The application site lies within the Central Core, as defined by the Proposals Map. It also falls within the East Side Major opportunity Area.

4.10 The RCAAP also defines the site as being within Reading's Central Core. Policy RC6 states that 'Other main town centre uses will take place in the Central Core, as defined by the Proposals Map'.

4.11 The site also falls within, but right on the south western edge, of the Station / River Major Opportunity Area, in an area allocated as RC1b the Primary Shopping Area. It states:

> *"RC1b, FRIARS WALK & GREYFRIARS ROAD:*
>
> *Development in this area will be of a mixed use with a significant leisure element. Active retail and leisure uses will be on the ground floor, particularly along Friar Street, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction at a single level into the Station Hill area and through to the station. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment."*

4.12 In addition to the AAP, the Council also prepared a Reading Station Area Framework, which set out principles and guidelines for how development around the station should take shape. This Framework illustrates a pedestrian route from Friar Street to the station passing through a new public space. The site fall within plot references S7 and S8, which indicate a density plot ratio of 200-500% or (2:1 - 5:1). The benchmark for heights is six storeys.

4.13 RBC's Housing mix policy is contained within 'RC9: Living in the Centre'. It sets out that proposals for residential development within the Central Area will be required to:

i. Contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.

ii. Demonstrate how the issue of potential noise disturbance from neighbouring land uses and other sources, and air quality implications of residential development, have been considered and if necessary, mitigated. New residential development should not be located next to existing town centre uses where those uses would give rise to unacceptable levels of noise and disturbance to the occupiers of the new scheme, unless this can be mitigated.

iii. Contribute towards affordable housing in line with Policy CS16 of the Core Strategy. In the central area, an over-concentration of social renting for single persons will be avoided.

iv. Provide mitigation measures in line with the scale of the impact.

Other Allocations

4.14 In addition to the land use allocations set out above, the site is also subject to the following planning policy allocations:

- Area of Archaeological Potential (Policy CS33 (Core Strategy). As noted above, planning permission will only be granted where development has no adverse impact on historic assets and their settings; and
- Cycle Route (Policy SA14). This sets out provision of an east/west cycle link that runs to the south of the proposal site.

Other supplementary Planning Guidance/Documents

4.15 RBC has produced various Supplementary Planning Guidance (SPGs) and Supplementary Planning Documents (SPDs) that have been considered as part of the scheme development. The following SPG's/SPD's are also of relevance to the consideration of the proposals:

- Sustainable Design and Construction SPD (2011);
- Revised Parking Standards and Design SPD (2012);
- Planning Obligations under Section 106 Supplementary Planning Document (adopted April 2015); and
- Community Infrastructure Levy Charging Schedule (Approved January 2015).

5.0 ASSESSMENT OF RELEVANT PLANNING ISSUES

5.1 This section sets out an assessment of the proposals against relevant planning policy issues.

Principle of Development

5.2 The location of the site is in central Reading. It is in principle therefore a sustainable location for main town centre uses, which include retail, leisure, offices and residential, as proposed. The Council's pre-application letter received on 7th September 2016 (see **Appendix 3**) confirms this.

Detailed Design

5.3 The design of the proposals have been informed by analysis of the surrounding area, comments provided by planning officers and has responded to the local context, matching the recent planning permissions adjacent to the site. The accompanying Design and Access Statement addresses the approach to each key design areas as follows:

- The perimeter block development seeks to mirror the approach to the approved Station Hill Site E and Telecom House. The proposal creates a central private courtyard whilst retaining active frontage on both Friar Street and Greyfriars Road.

- The proposed development seeks to retain active frontage along Friar Street with retail use (A1-A5 use) being provided a ground floor with residential floorspace above.

- The proposed development seeks to introduce an active frontage along Greyfriars Road for both the commercial use on the ground floor and the residential floorspace above whilst retaining the existing access for servicing and car park entrance.

- The elevation is proposed to be divided vertically and set back along the road frontage with the height and massing relating to the adjacent buildings of Central Studios and Greyfriars House.

- On the eastern boundary, the Station Hill scheme is set 1m off the boundary stepping up from 6-storeys on Friar Street to 12 storeys towards the station.

- At the planning pre-application stage, officers considered that they considered that the proposal should extend to the boundary on the proviso that no windows or outlook is provided within the eastern elevation with the courtyard increasing in width by 1m.

- The design of the north elevation of Block B, responds to the proposed approach taken by the approved Station Hill Site E and Telecom House scheme. The neighbouring parameter plans show their 12-storeys (plus basement) proposal approximately 1m off the northern boundary

Height & Massing

5.4 The design response to the northern boundary on the application site is to mirror the consented approach on the neighbouring site with a 1m offset from the northern boundary. The neighbouring parameter plans show their 12-storeys (plus basement) proposal approximately 1m off the northern boundary.

5.5 The proposal ranges in height to reflect the surrounding developments. It ranges from 4 storeys in height fronting building along Friar Street, seven storeys fronting onto Greyfriars Road and up to 10 storeys to the north of the site.

Impact on Neighbours

5.6 There are no windows or openings proposed on the eastern elevation and the scheme is designed to be constructed out of facing brickwork to be robust and maintenance free.

Active Frontage

5.7 The Central Area Action Plan Policy RC10 ‘Active frontages’ seeks to require the ground floor along the designated active frontages (which includes both Friar Street and Greyfriars Road) to be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors.

5.8 The scheme proposal seeks to comply with the policy requirement in that the proposed scheme fronts onto both Greyfriars Road and Friar Street (designated active frontages) to provide an active building frontage with a display window or glazed frontage at ground floor level. The scheme design is considered to contribute to the vibrancy of the Town Centre, and provide visual interest on both roads.

Housing Mix

5.9 RCCAP policy RC9 seeks a mix of units in major development and in development of 15 units or more, a maximum 40% of the units should be one-bed and a minimum of 5% should be at least three-bed, unless there is clear demonstration that this would adversely affect the viability of the development. The proposed mix of the proposal is outlined in Table 2, below.

Table 2: Proposed Residential Floorspace

Unit Type	Number	Percentage
Studio	1	1%
1 bedroom flat	60	44%
2 bedroom flat	69	50%
3 bedroom flat	7	5%
Total	**137**	**100%**

5.10 The shape of the site and the design approach this results in mean that exact policy compliance cannot be achieved, but the scheme aligns closely with the policy objective. The 5% minimum 3-bed + requirement is met. The 1-bed maximum of 40% is slightly exceeded at 44%.

Affordable Housing Provision

5.11 The scheme proposal complies with Policy CS 16, which requires 30% on-site provision. The 30% on-site provision is proposed within Building A, accessed from Greyfriars Road. The unit types are set out in Table 4, overleaf:

Table 5: Affordable Housing Provision:

Unit Type	Number	Percentage
1 bedroom flat	22	50%
2 bedroom flat	19	43%
3 bedroom flat	3	7%
Total	45	100%
Overall scheme %	33% (45/137)	

Landscape

5.12 The accompanying Landscape Report and Design and Access Statement details the design proposal for the inner courtyard area. The scheme proposed has considered the comments made during the pre-application process and seeks to ensure that it provides a high quality level of residential amenity for residents. The approach is to provide both a courtyard on the ground floor with amenity provided in an informal in character, minimises hard surfaces and provides routs around the perimeter of the courtyard and a series of roof gardens will be provided to provide a consistent appearance when viewed by residents.

Transport

5.13 Whilst the proposed car parking standard is below the required car parking provision as set out in the Reading Borough Council's Revised Parking Standards and Design Document, considering the site's central location within Reading and its proximity to frequent public transport services, in addition to strong pedestrian links to a wide range of amenities, this car parking provision is deemed appropriate and will not result in overspill car parking on the public highway, due to the existing parking controls surrounding the area. The only way to increase car parking on-site would be to build an extra level of basement car parking, which would make redevelopment unviable. Reducing the scale of development to comply with available car parking numbers would result in not making the best use of the site.

5.14 The applicant is willing to enter into a legal agreement to ensure that future occupants would be prohibited from obtaining on-street parking permits.

Flood Risk

5.15 A Flood Risk Assessment Statement and Drainage Statement have been prepared and accompany the application. The report advises that the site is located in Flood Zone 1, where all development is appropriate. A Flood Risk Assessment has been completed confirming reference to the Strategic Flood Risk Assessment. Sustainable Urban Drainage System (SUDS) are proposed to be utilised in the form of green roofs and permeable paving to reduce the flow into the public sewer.

Sustainability and Energy

5.16 Full details of the Energy and Sustainability measures incorporated into the redevelopment proposals are provided in the Energy Strategy and Sustainability Statement that accompany the application.

5.17 The development will incorporate key sustainability measures, including:

- Use of sustainable, energy efficient building technologies to reduce CO^2 emissions;
- Incorporation of low and zero carbon technologies;
- Adherence to sustainable construction site management practices including:
- Sourcing timber from reclaimed, reused or responsible sources;
- Developing and implementing a Site Wide Management Plan (SWMP);
- Signing up to the Considerate Constructors Scheme; and
- Reducing environmental impacts of the construction site.

Noise

5.18 A Noise assessment has been undertaken and considers that the site is suitable for the proposed development with respect to noise when taking into account the existing mixed nature of the surrounding area, including residential and commercial uses, and assuming the adoption of mitigation measures and noise emission limits identified within the report. Planning policy requires development proposals to prevent new development from contributing to, or being put at unacceptable risk from, noise pollution. The proposals are considered to fully accord with planning policy.

Air Quality

5.19 An Air Quality assessment of the potential impacts on local air quality from construction activities has been carried out and accompanies the application. The assessment identified that. The impact is considered to be negligible but recommends that a mechanical ventilation system with appropriate filtration be installed to reduce the NO2 concentrations below statutory limit values.

Wind/microclimate

5.20 A Microclimate report has been completed and accompanies the application. Two cases were assessed. These were the 'existing' situation and 'with Telecom house permission implemented'. Both are considered favourable for the intended uses at street level.

Heritage and Archaeology

5.21 It is consider that the proposed scheme responds to its heritage context and a scheme of good architectural merit has been advanced. Good quality building materials, with the potential for longevity, have been selected to complement traditional materials used on surrounding heritage assets. The replacement of the 'highly detrimental' impact of the existing building on the listed building's setting is also an important benefit of the proposal.

5.22 Overall the proposed scheme is assessed as likely to enhance the setting and significance of the listed building.

Assessment Summary

5.23 The proposed scheme for a mixed-use development in a town centre location is considered to be generally consistent with the development plan policy for the site. In addition, the scheme is of a high quality design, which improves the quality and appearance of the surrounding environment. The proposals will provide a wide range of planning benefits for the site and surrounding area, which include:

- Provision of high quality residential floorspace in the town centre;
- Provision of much needed affordable housing;
- Retention of active ground floor frontages and uses;

- A high quality design;
- Meeting national and local requirements for sustainable development;
- Improving the street scene and heritage setting through a well designed building of good quality materials;
- Providing consistency with the wider Station Hill redevelopment resulting in assisting with the comprehensive regeneration of this part of Reading;
- Provision of modern, flexible office floorspace in the town centre which will help boost the local economy;
- Provision of high quality amenity space for residents; and
- The use of sustainable and efficient building techniques as well as renewable technology.

6.0 COMMUNITY CONSULTATION

6.1 In order to ensure the submitted planning application takes account of local needs, a leaflet drop to local residents was undertaken prior to the submission of the planning application. Local Ward Councillors where also sent a copy of the leaflet.

6.2 In addition, a web-site was created providing further details on the scheme, together with a survey page enabling visitors to provide their comments.

6.3 As such the applicant considers that consultation has been undertaken in accordance with the Council's Statement of Community Involvement.

6.4 A copy of the consultation leaflet is provided in **Appendix 4** at the time of submission there had been four responses with three of the four responses positive about the redevelopment of the site. The other response was disappointed with the redevelopment of the site and potential loss of Sainsbury's even though retail use is being re-provided on the ground floor of Friar Street but the fourth response focuses on the loss of Sainsbury's.

7.0 SUMMARY

7.1 This Planning Statement has been prepared in support of a planning application for the "demolition of existing building and erection of new buildings to provide 137 residential units, commercial and retail use (Use Class A1-A5, B1(a) (offices) & D2 (gym only)) on the ground floor, with associated access, car parking, servicing, landscaping and engineering works".

7.2 The proposed development on this site is supported in principle therefore a sustainable location for main town centre uses, which include retail, leisure, offices and residential, as proposed. The Council's pre-application letter received on 7th September 2016 (see **Appendix 3**) confirms this.

7.3 The proposed scheme for a mixed-use development in a town centre location is considered to be generally consistent with the development plan policy for the site. In addition, the scheme is of a high quality design, which improves the quality and appearance of the surrounding environment.

APPENDIX 1

Site Location Plan

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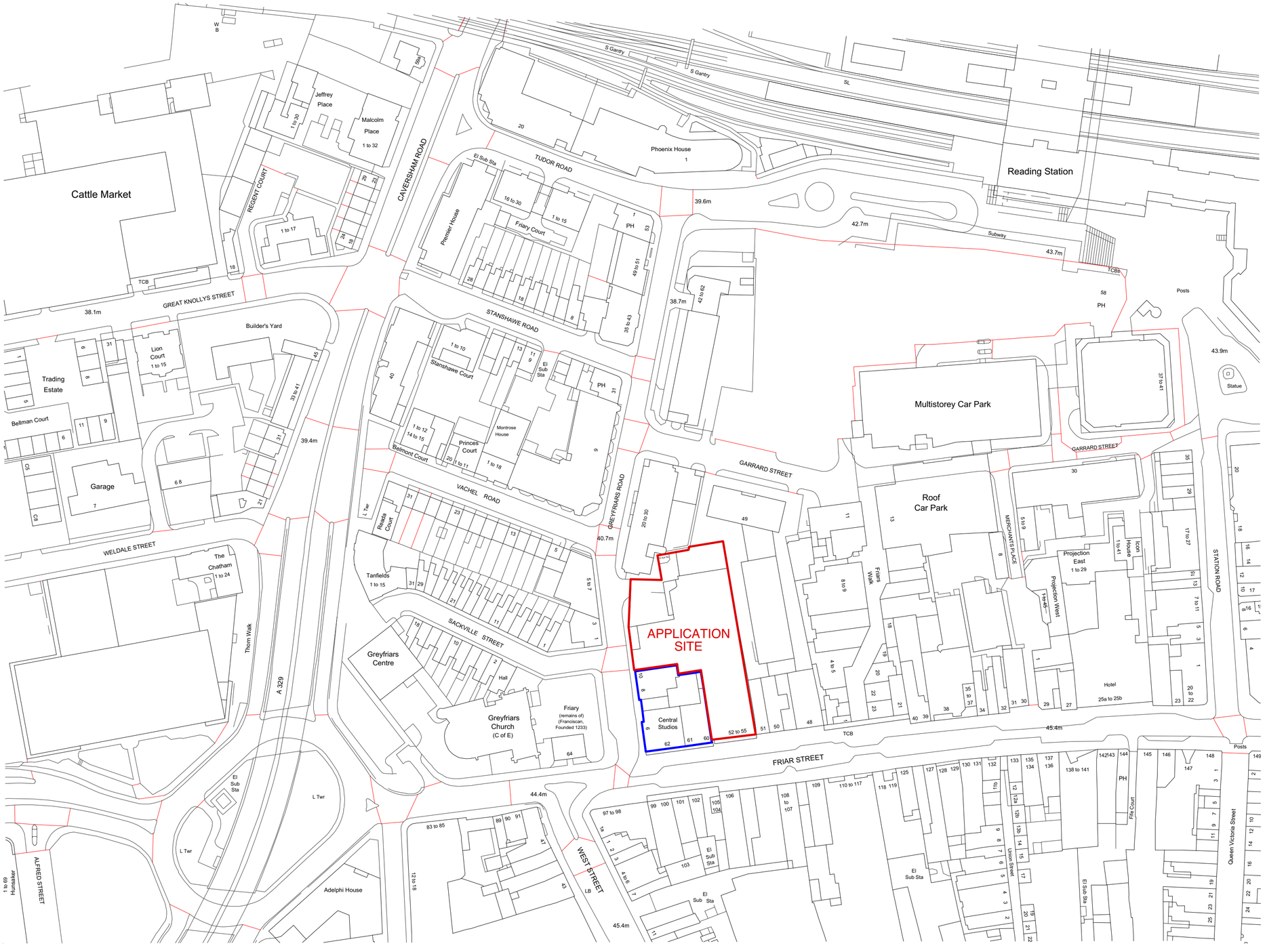

KEY

APPLICATION BOUNDARY
AREA 0.25ha

OTHER LAND IN APPLICANT'S CONTROL

PLANNING

REV.	DATE	DESCRIPTION

PROJECT
52-55 FRIAR STREET
& 12 GREYFRIARS ROAD
READING

DRAWING
SITE LOCATION PLAN

CLIENT
CIP PROPERTY (AIPT) LTD

SCALE	DRAWN
1:1250 @ A2	FM
DATE	CHECK
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APPENDIX 2

Proposed Layout Plan produced by LDA

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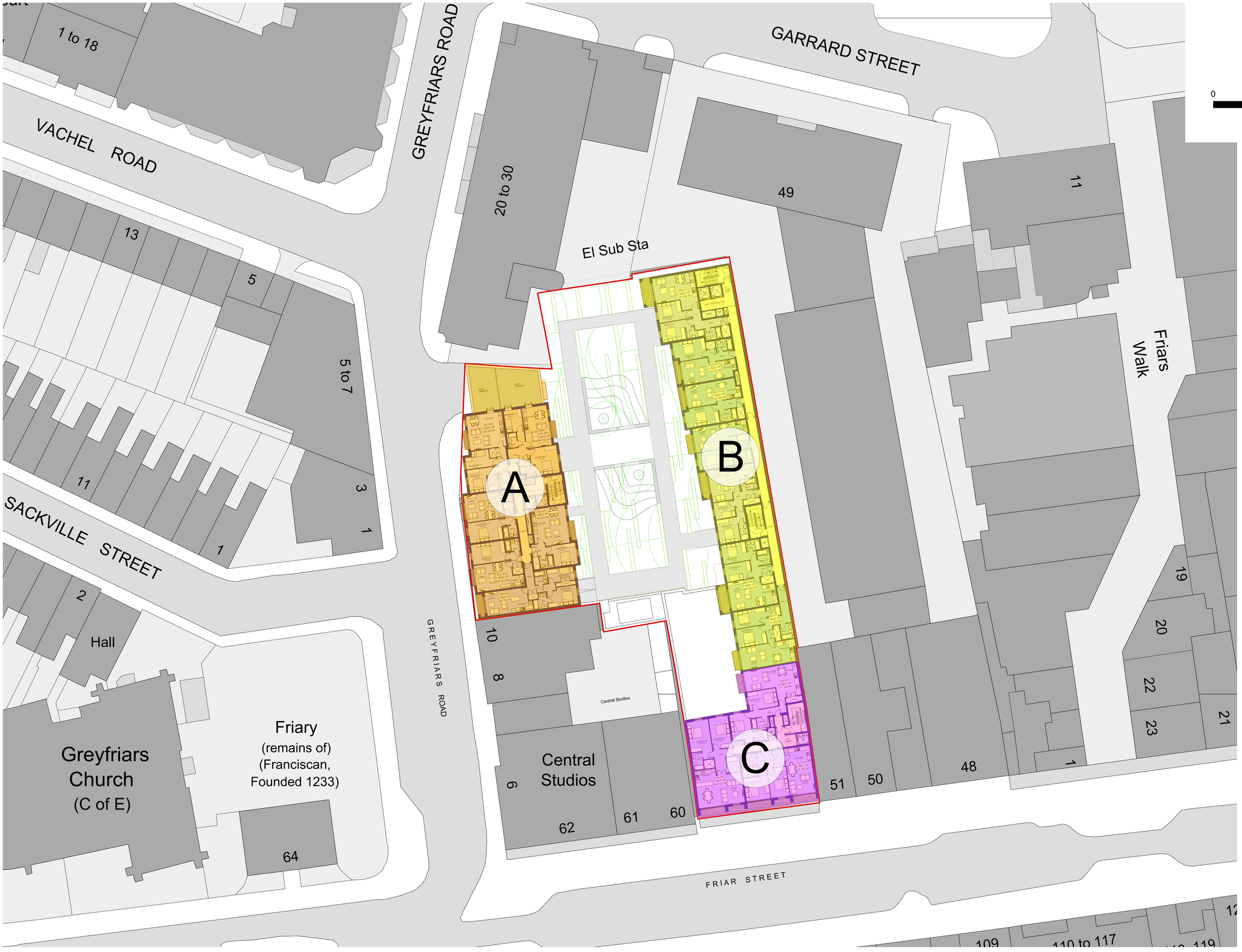

PRELIMINARY PLANNING

REV.	DATE	DESCRIPTION

PROJECT
52-55 FRIAR STREET
& 12 GREYFRIARS ROAD
READING

DRAWING
PROPOSED
BLOCK PLAN

CLIENT
CIP PROPERTY (AIPT) LTD

SCALE	DRAWN
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Nov 2016	PW
DRAWING No.	REVISION
1509-PL3-22	

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APPENDIX 3

Reading Borough Council's pre-application response (7th September 2016);

Giorgio Framalicco
Head of Planning, Development & Regulatory Services

Civic Offices, Bridge Street,
Reading, RG1 2LU

☎ 0118 9373787

Sarah Dawson
Associate
Barton Willmore
7 Soho Square
London
W1D 3QB

Our Ref: 161065/PREAPP

Direct: ☎ 0118 9372458

e-mail: jonathan.markwell@reading.gov.uk

7th September 2016

Your contact is: Mr Jonathan Markwell, Planning

Dear Ms Dawson,

TOWN AND COUNTRY PLANNING ACT 1990
Enquiry Reference & Address: 161065/PREAPP – 52-55 Friar Street and 12 Greyfriars Road, Reading, RG1.
Proposal: Mixed use redevelopment of the site. More specifically, erection of basement and 8-storey building fronting Greyfriars Road comprising 87sqm of commercial floorspace and 45 residential units (20x1, 24x2 and 1x3-bed); Erection of basement and part 9, part 11 storey buildings on Friar St / eastern boundary, comprising 540sqm commercial floorspace and 103 residential units (1x studio, 48x1, 53x2 and 1x3-bed); external courtyard space, basement parking and servicing (accessed off Greyfriars Road) and associated works, all following the demolition of the existing buildings. Total residential component is 148 units (1x studio, 68x1, 77x2 & 2x3-bed units). Total commercial component is 627sqm.
Meeting date: 25th July 2016
Those in attendance at the meeting: Lynette Baker, Jonathan Markwell & Richard Pike (Reading Borough Council); Robin Meakins (Barton Willmore); Mark Maurizi & Paul Winkworth (LDA Architects)
Information considered: Covering letter dated 2nd June; Design and Access Statement by LDA Architects Ltd, dated 26 May 2016 Issue 3; Proposed Ground Floor Plan 1509-PL2_24, as received 03/06/16; Proposed First Floor Plan 1509-PL2_25, as received 03/06/16; Typical Floor Plans & Accommodation Schedule 1509-SK105 Rev C, as received 03/06/16; Proposed Basement Plan 1509-PL2_23, as received 12/07/16; Email from Barton Willmore dated 12/07/16.

Thank you for your recent enquiry in relation to the above site. Further to the meeting on 25th July, please see below written advice summarising the advice provided at the meeting.

Background

Any planning application at the site would be considered within the context of the Council's LDF Core Strategy (2008, Altered 2015), Central Area Action Plan (2009) and Sites and the Detailed Policies (2012, Altered 2015) documents. Supplementary Planning documents would also be applied where relevant (in particular in this instance the Reading Station Area

Framework 2010 and Station Hill South Planning and Urban Design Brief 2007), together with national guidance (the NPPF). Please use this link to view the local policies and guidance.

Based on your submission, this response follows the matters you wished to be specified:

- Level of development
- Height and massing / Design (also incorporating active street frontages)
- Mix of units
- Affordable housing
- Type of application & level of information to be submitted

In addition, a number of other matters are also included in this response:

- Quality of accommodation for future occupiers & amenity impacts on nearby occupiers
- Transport comments
- Natural Environment & Ecology comments
- Environmental Protection comments
- Other matters

As such, each matter is detailed in-turn below:

Level of development

In terms of land use principles, it would appear that any proposal at the site would result in the loss of retail floorspace at the site. However, the retention of commercial uses on the Friar Street and Greyfriars Road frontages, within the context of policies RC1b, RC6, RC10, CS14, CS25, CS26 and CS27, means that in overall terms it is not considered that there are any fundamental land use concerns with the proposals.

As discussed at the meeting, the RC1b policy makes specific reference to leisure uses. You indicated at the meeting that the commercial unit on Greyfriars Road would be sought to be a flexible space, incorporating Class D2 uses (for example a gymnasium). I would suggest that such an approach is not uncommon, nor likely to be contentious in principle. However, different uses have different potential impacts (e.g. parking and servicing / plant / amenity impacts) and therefore all scenarios need to be accounted for in any future submission. For example, if you are seeking to include a Class D2 use, this covers a wide range of activities (each with potentially a wide array of implications). In this instance you would need to specify the exact uses within the D2 class and factor each in accordingly in terms of parking / servicing / amenity etc. If a leisure use is subsequently proposed, reference to policy RC7 should also be made.

In terms of the general layout approach, which seeks to provide a perimeter block scheme, it is advised that this raises no in-principle concerns. Although it is noted that this layout differs from that suggested in the Reading Station Area Framework, it is considered to be an appropriate response to the neighbouring proposals considered under application 151426 (as granted on 26/07/16).

Height and massing / Design (also incorporating active street frontages)

The proposals can be split into three elements: the building fronting onto Greyfriars Road; the element on the Friar Street frontage; the element to the rear of the site on the eastern boundary. It is first important to recognise that the site is located outside of the designated

tall building clusters. As such, in order to comply with policy RC13, no building should be more than 12 storeys (36m) in height. It will be expected for all your future plans to specify land levels and show the proposals accurately within the context of all existing nearby buildings (or the heights approved as part of permission 151436 at the neighbouring site).

In terms of the general scale and massing of the Greyfriars Road element, this is considered to be appropriate, responding sufficiently to the neighbouring buildings to the north and south. Furthermore, the brick led approach and narrow frontage buildings, as shown, appear appropriate in principle and are broadly welcomed.

At this part of the site you are specifically required, as per policy RC12d&e, to be particularly mindful of the potential impact on the small scale terraced housing within Sackville Street, Vachel Road and Stanshawe Road. It is also considered that the detailed design approach could take cues from some of the positive features which exist in these nearby streets, such as the patterned brickwork housing on Sackville Street.

In relation to other detailed design points, based on the visual at section 6.07 of the DAS, it is queried whether the reveals on the windows could be increased to provide a greater depth and richness to the façade? Based on the visuals the windows appear almost flush with the brickwork and providing deeper window reveals may assist in increasing the quality of the finished appearance.

Our discussions at the meeting also considered the ground floor approach, including the provision of multiple entrances at this point and the provision of colonnades. In terms of the entrances, it is queried (whilst acknowledging the constraint of the change in land levels) whether some of these could be co-joined to increase the width of the frontage for the commercial unit (to increase the 'active' nature of the frontage as a whole). For example, could the pedestrian steps and pedestrian ramp be combined at a single point? Furthermore, it is queried whether the servicing access is located at the optimal point, from the perspective of the future commercial operator to the Friar Street unit. It is considered that robust justification will need to be provided to demonstrate how the servicing would work in practice, to assist in seeking to ensure that the relatively large unit fronting onto Friar Street would be suitably attractive for a future occupier. Officers would not wish to assist in creating a situation whereby the unit fronting onto Friar Street is difficult to let and instead may be vacant for long periods of time.

In terms of the colonnades, it is queried whether this approach is justified from a design or crime/safety perspective. Furthermore, it is considered that such a space may make the commercial unit proposed less attractive to future occupiers (given it will be likely to reduce the visibility of the unit) and whether it would be actively used by pedestrians at this point. Given these multiple factors it is considered that you should explore alternative options which omit this element.

You are also advised to be mindful that there are north side elevation boundary windows serving the student accommodation on the junction of Friar Street and Greyfriars Road. However, these appear to serve corridors, rather than student rooms.

Turning to consider the building fronting onto Friar Street, the scale specified at section 6.04 of the DAS would not be supported. It would appear that you have inaccurately depicted the height approved at the neighbouring site (as part of 151426), by illustrating the height originally proposed in that application, rather than the height subsequently approved (which was reduced, as per the officer committee report and the approved plans). In short, it is

advised that at this part of the site a scale which is no greater than that approved as 151426 would be likely to be supported. This is in order to provide a satisfactory transition in scale in buildings along the streetscene at this point, also taking into account nearby listed buildings and conservation areas. As a result, it is considered likely that two-storeys of accommodation will need to be removed from the elevation shown at section 6.04, meaning there would be five floors of accommodation above the ground floor use. Based on the visual material provided, the general design approach appears appropriate, with the shown inset balconies being essential (rather than projecting balconies) owing to the nature of Friar Street.

It is considered that any proposal at the site as a whole will need to be particularly mindful of the potential impact on the Grade I listed Greyfriars Church (e.g. from long views at Chatham Street), in addition to other listed buildings / heritage assets close to the site (e.g. the former Greyfriars Vicarage (No. 64 Friar Street). The potential impact on the setting of the St Mary's Butts Conservation Area will also need to be carefully considered and demonstrated in any future submission. You will note from the officer committee report for application 151426/OUT at the neighbouring site that the original scale of that proposal on the Friar Street frontage was reduced partly as a result of these matters. The officer committee report also outlines the level and nature of information submitted in support of the neighbouring proposals in this regard. It is advised that a similar level/extent of information will be required to be submitted for proposals at this site.

Finally, in terms of the element of the scheme on the eastern boundary, it is advised that you will need to provide fully accurate plans demonstrating how this responds to the height approved as part of permission 151426 at the neighbouring site. It is considered that a scale and massing similar in nature to that approved at the neighbouring site is likely to be considered appropriate at this point in principle, subject to the necessary justification being provided in respect of impact on heritage assets (as per the previous paragraph).

It is considered that particular attention should be paid to the transition point between the block fronting onto Friar Street and that to the rear along the eastern boundary. It is considered that it may be necessary to incorporate a stepped approach in scale at this point.

In terms of the matter raised in respect of the proximity of the development to the boundary with the site to the east, officers consider that purely from a planning perspective there is no issue with your proposal extending to the boundary (and not being set 1m off the boundary, as the neighbouring scheme is). This is on the proviso that no windows or outlook is provided within your eastern elevation. Please also note that this advice is notwithstanding separate issues outside of purely planning considerations, such as party wall agreements, ownership issues and the management/maintenance of the building in due course. You specified at the meeting that if you were to propose a scheme up to the boundary with the adjoining land, this would result in the open courtyard space increasing in width by 1m too. It is advised that this should be followed in any future proposal, rather than increasing the width of the building at this point by 1m.

In relation to the detailed design of this block, as per section 6.11 of the DAS, this appears consistent with the other buildings proposed at the site. As such, the general approach is welcomed, taking into account comments already made (which equally apply in this instance). In addition, at section 6.10 it is shown that a variety of balconies are proposed. In this regard, particularly at high levels, it is considered beneficial if the materials are as lightweight at possible (e.g. single panes of glass with minimal fixings) to enable these to be as subtle in appearance as possible.

Prior to the submission of any application at the site you are strongly encouraged to engage Historic England and the Crime Prevention Design Advisor at Thames Valley Police. Contact details are as follows:

Marie Twomey
Business Officer South East
Planning Group
Historic England
195-205 High Street, Eastgate Court, Guildford, GU1 3EH
Direct Line: 01483 25 2030 | Fax: 01483 252001
www.historicengland.org.uk
Marie.Twomey@HistoricEngland.org.uk

Anne Chalmers
Crime Prevention & Design Advisor
Berkshire | Neighbourhood Policing & Partnerships
Thames Valley Police
Tel. 01753 835472 / Mobile: 07800703324
Email: anne.chalmers@thamesvalley.pnn.police.uk

Mix of units

Policy RC9 seeks for a maximum of 40% of units to be 1-bed and a minimum of 5% to be at least 3-bed. Your current proposal seeks to provide 46.6% 1-bed and 1.4% 3-bed units. As such, the proposed mix should be altered to reduce the percentage of 1-bed units and increase the percentage of 3-bed units, in order to comply with this policy. You will note that the policy specifies that this mix should be followed "unless it can be clearly demonstrated that this would render the development unviable". If you wish to pursue this, it would be most clearly demonstrated by running various viability scenarios, which cover both the proposed mix (demonstrating this to be viable) and a policy compliant mix (demonstrating this to be unviable). This would be subject to consideration by the Council's Valuer. The separate section below on affordable housing provides more detailed information concerning how viability matters are considered and assessed.

Affordable housing

The policy requirement is for 30% on-site provision, as per policy CS16. You will note that on-site provision is always sought in the first instance and this will be expected on a site of this nature. As per the input from my colleague Richard Pike at the meeting, further to the guidance stated affordable housing SPD, the current target tenure mix should be 70% rent /30% shared ownership. In terms of the unit size preference for affordable housing, the greatest need is for 2-bed units (c.60%), followed by 1-bed (c.35%) and finally 3+bed units (c. 5%).

If you are not seeking to provide a policy compliant level of affordable housing, a viability appraisal and report as per sections 1 and 27 of the validation information requirements (see link within 'Other matters' section below).

As of July 2015 the Council's valuer charges a separate fee for the assessment of viability matters (at either pre-app or application stage), as detailed below.

Type Initial fixed fee*

1-4 units £1,000 (excluding VAT**)
5-9 units £2,000 (excluding VAT**)

*If deferred to external consultants then their cost will be advised at the time of outsourcing.

All pre-application viability charges are subject to **VAT. Those considered at application stage are not subject to VAT.

Based on past experiences it is considered essential for at least the methodology for any future viability assessment to be discussed at pre-application stage. Leaving viability matters to be discussed solely at application stage is likely to significantly increase the time for the application to be determined. Therefore, if you are subsequently seeking not to be providing a policy compliant level of affordable housing then further pre-application discussions are very much encouraged.

Type of application & level of information to be submitted

As detailed at the meeting, a single full application for planning permission (rather than any outline permission) would be far preferable from the perspective of officers. The scheme appears to be well advanced in nature and would appear most suitable to be submitted as a full application. As discussed, officers have considerable experience of section 96a (non-material amendment) and section 73 (variation of condition – minor material amendment) applications, which would be applied as flexibly as possible should they be necessary subsequent to any permission at the site. Such an approach is considered to be a simpler and more efficient approach than an outline/reserved matters submission.

In terms of the level and nature of information to be provided at application stage, please see the 'validation requirements' heading in the 'other matters' section.

Quality of accommodation for future occupiers & amenity impacts on nearby occupiers

In terms of overlooking and loss of privacy, it is noted that the scheme previously sought a 20m gap between the blocks, whereas the current proposal incorporates an 18m gap. It is also acknowledged that this will potentially increase to 19m if the eastern block is moved to the boundary (as discussed elsewhere). You will be aware that Policy DM4 states that 20m is usually appropriate, while also stating there may be circumstances on individual sites which enable a closer distance to be considered appropriate. Therefore, should the distance between the perimeter blocks be below 20m, you are advised to submit detailed commentary (illustrated by a variety of visuals demonstrating the distances at various points) seeking to justify this.

In this regard you are advised to be particularly mindful of overlooking / loss of privacy around the corner of perimeter blocks, as this is traditionally the area where the loss of amenity is greatest. It is considered that the careful siting / orientation of windows / rooms / staircores can reduce instances of overlooking at these points.

Given the dense urban nature of the site, it is considered essential for any scheme to be supported with a fully BRE-based daylight/sunlight assessment. This is in terms of future occupiers of the proposed units, nearby existing occupiers (including the student accommodation) and sunlight requirements of amenity spaces. The information provided at 6.15 of the DAS appears to be an initial assessment, whereas in practice a full BRE assessment will be required to satisfy this element of policy DM4. Following on from this, you are also

advised to consider microclimate matters (more specifically a wind assessment), in light of the proposed heights of buildings and the limited space between buildings at this point.

It is noted that a significant number of the units will be single aspect flats, which is considered to be far from ideal. However, in respect of the block on the eastern boundary, this is acknowledged to be an inevitable consequence of the neighbouring scheme. Elsewhere, it would be far preferred if the units proposed were dual aspect to improve the quality of accommodation for future occupiers. It is advised that steps should be taken to seek to incorporate dual aspect units into the proposals.

In terms of the individual flat and bedroom sizes, you are advised to comply with the DCLG Technical housing standards – nationally described space standards. You are advised to specify on the proposed floor plans evidence of meeting these standards in all instances. Based on the information at section 6.13 of the DAS, both the 2 & 3-bed units appear to be undersized.

As per policy DM10, it will be fully expected for all units to provide private and communal open space. You will note that the policy and supporting text provides for flexibility in central Reading locations such as this. Nevertheless, spaces of the nature/size demonstrated within the DAS (balconies & a central courtyard space) will be expected to be provided. The layout of the courtyard appears on the floor plan to be dominated by hard landscaping and you are advised to instead maximise soft landscaping space for casual leisure and recreation.

Linked to the quality of accommodation for future occupiers, the Council's Core Strategy Policy CS29 (Provision of Open Space) states that "All new development should make provision for the open space needs of the development through appropriate on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities, including open space. New provision will be sought on residential sites of 50 or more units (emphasis added by officers), or for developments where the availability and quality of existing provision has been identified as deficient in the provision for open space." Policy DM16 is also of relevance, in particular the third bullet point of the policy that the open space be accessible to the general public (bearing in mind that it was stipulated at the meeting that the space would not be accessible by the general public).

Accepting that new provision is required in this instance, as there is in excess of 50 residential units, it is questioned at this stage whether the proposals provide sufficient open space for a development of this size. The policy states: "A good quality of life requires space for sport and recreation, leisure, quiet enjoyment and relaxation, children's play, educational experience, visual stimulus and amenity, and places in which to enjoy nature, biodiversity and the elements. People living in urban areas, need access to open spaces, to parks, to sports pitches, to places to relax in and places to play. In the current era of high-density developments that reduce external amenity areas and open space, the need for proper open space provision, and safe and easy access to such spaces, is even more imperative. Consequently it is essential that new developments make provision for open space to meet the needs of the residents/occupiers of the development. With a growing population resulting from new development, it follows that the amount and quality of open space in the Borough should increase over the plan period." This is linked in with the Council's Open Spaces Strategy.

Whilst the indication that on-site play equipment will be provided is welcomed in principle, the type of features and their location need careful consideration. Much more detail is required on the play spaces, including: whether these areas are fenced? How many access

points are included? What seating is being provided? Whether there is any conflict with vehicular movement?

The Council's Supplementary Planning Document (SPD) on "Planning Obligations under S106" (adopted in April 2015) is relevant to this development: http://www.reading.gov.uk/media/1067/Draft-Section-106-Planning-Obligations/pdf/S106-Planning-Obligations-SPD-Adopted-April-2015.pdf

Paragraph 4.2 the SPD advises that the Council will seek to address site specific impacts outside of the remit of CIL, provided associated contributions are clearly linked to the development and are needed to make a development acceptable. The table at the top of page 6 of the SPD clarifies that S106 and not CIL contributions will be used for the *"Enhancement and management of and access to local outdoor recreation and open space directly serving the development, including provision in line with adopted site-specific policy."* As such, to address the likely site specific impact, and to make the scheme acceptable in planning terms, a financial contribution is therefore likely in practice to be required.

Transport and waste services comments

First, please note that these comments are those provided in advance of our meeting on 25th July, and do not refer/relate to subsequent separate correspondence I understand has taken place between RBC Transport officers and Kamran Haider of Vectos (e.g. emails of 03/08/16, 31/08/16 and 01/09/16).

The site is located within the Reading Central Area and within Reading's primary shopping area. The site is located within Zone 1 of the adopted Parking Standards and Design SPD, which is an area at the very heart of Reading Borough, consisting primarily of retail and commercial office developments, with limited residential.

This area is well served by rail and bus links and also contains the largest proportion of public car parking spaces. In accordance with the adopted SPD, the development would be required to provide a parking provision of 0.5 spaces per 1-2 bedroom dwelling and 1 space per 3 bedroom dwelling. Plans submitted illustrate that a total of 28 car parking spaces will be provided made up of 16 disabled bays and 12 regular bays this would be deemed acceptable given the developments town centre location and good transportation links. However, it should be noted that Friar Street and the surrounding road network all have parking restrictions preventing on-street parking. Friar Street does not fall within a Resident's Permit Zone but the adjacent streets such as Sackville Street and Vachel Road are. Therefore, the shortfall in residential parking should not be accommodated on the surrounding roads where there is already significant demand for on-street parking. As such, parking conditions and informatives would be applied to prevent any future occupants of the new dwellings from obtaining a residents parking permit for the surrounding residential streets (where parking is under considerable pressure). This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

It is also noted that Friar Street itself is used by buses and has access restrictions in place during certain times of the day. There is a 24 hours restriction in place for Friar Street West Bound (except for buses and taxis) and time restricted access Friar Street East Bound.

In accordance with the adopted Parking Standards and Design SPD, the development is required to provide a minimum of 0.5 cycle parking spaces for a Class C3 1-2 bedroom flat and 1 cycle parking space for each 3 bedroom flat. These should be positioned in a conveniently located, lockable, covered store. The plans submitted indicate on site cycle storage located adjacent to the car parking area for 74 spaces for the flats and 6 for the retail unit and 1 for the office. Given the mix and number of units is likely to change, as noted elsewhere in this advice, it is advised that the cycle parking standards should be adhered to in any future proposal.

Plans indicate that the existing Sainsbury's Service Yard accessed from Greyfriars Road is to be modified for additional car entrance. It is also stated that the loading bay will also be used for servicing commercial space, furniture removals, deliveries and refuse vehicles. There appears to be an existing turning area for delivery vehicles. Therefore this is an existing provision that will be required to be maintained. Paragraph 4.8 of the Geometric Design Guidance for Residential Accesses on to Classified Roads and Commercial Accesses on to Adopted Roads states:

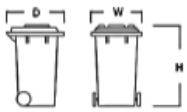
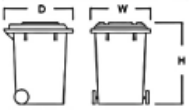
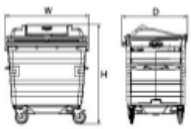
"All new commercial developments accessed from an adopted road, will be required to be provided with an adequate turning area to enable service vehicles including refuge vehicles and articulated vehicles the ability to enter and leave the site in a forward gear. If such an area is not provided it is likely that an objection to the proposals will be forthcoming".

Greyfriars Road is a one way street servicing residential streets as well as commercial areas. Visibility splays will need to be illustrated if a full application is submitted and details with regards to the use of barriers or gates. Clarification is also required as to how the retail unit is to be served.

Waste Container Dimensions

This appendix provides information on the dimensions of Reading Borough Council's waste receptacles that we supply and empty.

Please be aware that private waste contractors can use a range of various sized vehicles and containers for waste collection and should be consulted at the earliest stage of development.

Capacity	H (mm)	D (mm)	W (mm)	
240 - litre *Up to 5 Adults over 16yrs old in a house.* Colour requirements: Grey / Black - Landfill Red - Recycling. £41.20 each	1085	730	575	
360 - litre *For large families of over 5 adults in a house.* Colour requirements: Grey / Black - Landfill Red - Recycling £61.80 each	1090	880	580	
1100 - litre *Blocks of flats & communal bin areas.* *5 flats per 1100 on a Fortnightly collection or 10 flats per 1100 on a Weekly collection; Collection frequency to be determined by Reading Borough Council* Colour requirements: Grey / Black - Landfill & Green - Recycling £272.95 each	1295	1118	1370	

Plans indicate the provision for bin storage and recycling in the car parking area which would be serviced via the loading bay area. Bin storage should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings to avoid the stationing of service vehicles on the carriageway for excessive periods. Please also see the RBC requirements below. If you wish to receive a full copy of these Waste Management Guidelines, please email me.

Natural Environment & Ecology officer comments

The Natural Environment officer has considered the Design & Access Statement submitted and responds as follows:

- The proposed new landscaping indicated (courtyard and green roofs & terraces) will be an improvement to the site as it currently stands; the green roofs being consistent with that proposed on adjacent Plot E, Station Hill (151426).
- The courtyard is over the basement car park and this is likely to result in planting constraints, e.g. soil volume & hence tree species. It would be useful to have further information on this at the pre-app stage.
- The choice of species (both trees and shrubs) will require careful selection to allow for the likely environment within the courtyard, e.g. shade tolerant species and those tolerant of reflected heat and light.
- In terms of courtyard maintenance, given that the soil in the courtyard will not be naturally maintained, specific maintenance requirements will be required, e.g. fertilisation and potentially additional watering (consideration could be given to directing rainwater runoff into soft landscape areas).
- It is also noted that tree planting is proposed along Greyfriars Road, which will be a positive contribution to the street scene, which is considered to currently lack greenery. Again, species will have to be carefully selected. In this instance this is to ensure they do not outgrow their confined location and to be tolerant of this urban environment, e.g. reflected heat and light and pollution. It would be useful to know if services checks have been carried out in this location to confirm that tree planting in the ground is actually feasible? Specific tree pits designed for hard landscape areas will be required, e.g. with root cells and root directors to allow sufficient rooting volume so that the trees can achieve their optimum size whilst not affecting adjacent structures.

You are strongly encouraged to consider the above points and provide further feedback on these points at the pre-application stage. If not, all the above will need to be addressed in application submissions along with full hard and soft landscape details.

The Ecology officer advises that there are unlikely to be any significant ecological constraints to the proposals, but due to the size of the scheme you are required to submit a preliminary ecological appraisal, including a preliminary bat roost assessment, with any application. A high quality and wildlife friendly landscaping scheme will need to be provided, as will biodiversity enhancements such as swift bricks and other integral bird nesting features. It is advised that such elements are included in any future submission, to avoid the need for such matters to be secured via condition.

Environmental Protection (EP) officer comments

EP officers have potential concerns about possible noise, air quality and demolition / construction phase works.

More specifically in terms of the noise impact on development, it is advised that a noise assessment should be submitted in support of any application for new residential proposed in existing noisy areas (such as this). The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (L_{AMax}) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB $L_{Aeq,8hour}$	
Living rooms (07:00 – 23:00)	<35dB $L_{Aeq,16hour}$	
Gardens & Balconies	<50dB $L_{Aeq,T}$	<55dB $L_{Aeq,T}$

It may be possible through clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Noise mitigation is likely to focus on the weak point in the structure; glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather, however non-openable windows are not considered an acceptable solution due to the impact on living standards. A condition would be likely to be included in any permission specifying that the mitigation measures shall be installed in accordance with the approved specifications prior to occupation.

In terms of noise generated from the development, it is advised that applications which include noise generating plant (when there are nearby noise sensitive receptors, including future residential occupiers – the most likely scenario in this instance) should be accompanied by an acoustic assessment. This should be carried out in accordance with BS4142:2014 methodology.

Within Reading there is strong justification for requiring the plant noise rating level to be at least -10dB below the measured background level. More specifically, this is sought to prevent cumulative impact from the addition of plant over time. Such instances could result in background levels creeping up to levels which might cause adverse health impact, which is more likely in a densely occupied town such as Reading. Levels of -10dB ensure that the background level is not increased and nuisance is unlikely.

However, it is acknowledged that there may be some situations where this cannot be achieved. As such, there may be some flexibility where this is justifiable (e.g. where there are very low background noise levels, etc). Reasons should be clearly stated within the assessment conclusion if you are seeking to provide plant which would be within 10dB below the measured background level. Furthermore, the assessment report should include any mitigation measures required in order to meet our criteria.

Moving on to consider air quality measures, the proposed development is located within an air quality management area. EP has identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO2) and introduces new exposure / receptors. An assessment and mitigation measures should be provided as part of the application. You are advised that the assessment will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality. The following list of potential measures is by no means an exhaustive list:

Mitigation against increased exposure:

- Mechanical ventilation – inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones – consider increasing distance of the building façade from very busy roads
- Habitable rooms – consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
- Mixed use – locate any sensitive uses on higher floors, allowing commercial use on lower elevations
- Balconies – consider avoiding use in areas of exceedance, especially on ground and first floor level
- Non-opening front windows – this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants

Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

Finally, from an EP perspective, officers have concerns about potential noise and dust associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). EP recommends that details of how they will be controlled are submitted as part of a Construction Method Statement (either submitted at application stage or secured via condition).

<u>Other matters</u>

- In terms of sustainability/energy requirements, the 20% carbon emissions reduction referenced under Policy CS1 has been superseded, as per paragraph 2.2 the Sustainability SPD. The current target is instead 19% over the 2013 Building Regulations.

- An energy strategy should include decentralised energy provision (as per policy DM2) and also ensure that it is future proofed for connections to other sites which may come forward in the medium/long term close to the site. Furthermore, you should explore whether links to/from the wider Station Hill area could be included in your strategy.

- At the time of any application, it is likely that the following conditions would be applied (supplied for your information):

Construction shall not commence until written documentary evidence has been submitted to, and receipt acknowledged in writing by, the local planning authority demonstrating that 50% of the dwellings hereby permitted will achieve a minimum of a 19% improvement in the dwelling emission rate over the target emission rate, as defined in The Building Regulations for England

Approved Document L1A: Conservation of Fuel and Power in New Dwellings (2013 edition). Such evidence shall be in the form of a Design Stage Standard Assessment Procedure (SAP) Assessment, produced by an accredited energy assessor.

The development hereby permitted shall not be occupied until written documentary evidence has been submitted to, and receipt acknowledged in writing by, the local planning authority demonstrating that 50% of the dwellings hereby permitted have achieved a minimum of a 19% improvement in the dwelling emission rate over the target emission rate, as defined in The Building Regulations for England Approved Document L1a: Conservation of Fuel and Power in New Dwellings (2013 edition). Such evidence shall be in the form of an As Built Standard Assessment Procedure, produced by an accredited energy assessor.

- With the withdrawal of code for sustainable homes in 2015, this is no longer required for the residential component of the development, although the development will still be required to demonstrate its sustainability credentials in line with the relevant LDF policies.

- The non-residential elements will be required to accord with the relevant BREEAM standards, with the sustainability SPD specifying the requirements at application stage and the subsequent likely conditions (including details about the timing of such conditions).

- The proposals would be likely to be CIL liable, with CIL having been introduced from 1st April 2015. Please see the website for the approved charging schedule.

- The proposals will require a S106 legal agreement for any future affordable housing component. Please see the Planning Obligations SPD (April 2015) for more information. It is also likely that a number of other elements may be required to be secured via legal agreement, such as a construction stills and end user employment contribution for example. Such matters will be able to be considered further upon the submission of any application at the site.

- In line with paragraph 189 of the NPPF, you are strongly encouraged to engage with the local community (and ward councillors) prior to the submission of any application. Moreover, please see sections 4 and 7 (in particular) of the Reading Borough Statement of Community Involvement, which reinforces the need to consult with the local community before submitting any application. It is strongly advised that for this proposal, pre-application discussions with the local community and wider stakeholders are undertaken as specified previously in my email of 29th June.

- PPA – as per my email of 29th June, I would again encourage you to consider entering into a pre-app and/or application stage Planning Performance Agreement, in line with paragraph 195 of the NPPF. There are considered to be several benefits of a PPA. First it provides a structured framework for steering development proposals through all the necessary stages of identifying issues, consultation and negotiation in order to arrive at a well informed decision at application stage. Entering into a PPA also leads to a more collaborative approach between the developer and local planning authority in which issues, timescales, costs and requirements such as community involvement or specialist supporting evidence are agreed at an early stage. Furthermore, at application stage, it provides an alternative route from the standard 13 week time-constraint that would otherwise be imposed for determining Major Applications in line with Government targets.

- Validation requirements – Based on the information provided and the nature of the proposals, it is envisaged that the following documents would be required for any future application, in line with the validation checklist document:

  All necessary part 1 requirements (in particular the SuDS information, which based on previous experiences is often overlooked by applicants)

  1. Affordable housing statement
  2. Air quality assessment
  3. Archaeological assessment (as the site is within an area of archaeological importance)
  5. Daylight/sunlight assessment (in terms of future occupiers, existing nearby occupiers and the proposed amenity space)
  6. Ecological survey and reports
  7. Energy efficiency statements
  8. Environmental impact statement (you are advised to consider submitting an EIA screening request, given the closeness of the number of units proposed to the EIA screening threshold)
  9. External lighting
  10. Flood Risk-assessment (depending on the size of the site)
  11. Heads of Terms proposal
  12. Heritage Statement
  13. Landscape principles
  14. Materials details
  15. Noise & vibration impact assessment
  16. Open Space Statement
  17. Planning Statement
  18. Plans and drawings
  19. Superfast Broadband Strategy Statement
  20. Sustainability Statements
  22. Transport Assessment & Travel Plans
  23. Tree Survey (in relation to the TPO trees to the west of the site)
  24. Utilities surveys and proposals
  25. Vehicle (including cycle) parking and waste collection details
  26. Vent/flue & ventilation details
  27. Viability Appraisal & report

A microclimate assessment is also likely to be required, owing to the nature of the proposals.

CIL information is also required, in particular the need for you to demonstrate the methodology for the floorspace figures you state. This is typically provided in a separate schedule of scaled plans, highlighting the areas included and omitted from the calculation.

You are strongly advised to make use of the part 1 and part 2 checklists as part of any future submission.

Concluding remarks

In conclusion, it is considered that there is scope to progress your proposals further, although it is likely that a number of alterations will be required in line with the advice above. Ideally your proposals should progress through further pre-application discussions (in particular

regarding affordable housing proposals), prior to the submission of a full application thereafter.

Please note that the advice contained within this letter is that of an officer of the Borough Council and is provided without prejudice to the decision of the Borough Council, in the event of a formal application for planning permission. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council.

Yours sincerely

Jonathan Markwell (via email only)

Jonathan Markwell - Principal Planning Officer
LEB

APPENDIX 4

Community Consultation Leaflet

Land at 52-55 Friar Street & 12 Greyfriars Road, Reading

On behalf of **Aviva Investors** we would like to make you aware of their intention to redevelop the site, which is located within Reading Town Centre near to the corner of Friar Street and Greyfriars Road.

Aviva Investors intends to redevelop the site and provide a residential scheme with commercial and office space on the ground floor fronting onto both Friar Street and Greyfriars Road.

Aerial View

Scheme Proposals

The proposals seek to provide approximately 140 residential apartments and around 620 sq m of commercial/retail floorspace on the ground floor. The scheme proposes to provide a range of 1, 2 and 3-bedroom units, provide around 30% affordable housing on site together with a range of energy efficiency measures, a landscaped courtyard and high quality materials.

A planning application will be submitted to Reading Borough Council in late autumn 2016, although before it is submitted we would welcome your views on the proposals.

If you wish to comment, please write to:

Land at 52-55 Friar Street & 12 Greyfriars Rd consultation
Barton Willmore LLP
7 Soho Square
London
W1D 3QB
or visit: **www.friarstreetdevelopment.com**

APPENDIX 5

Extract from consultation website

52-55 &12

Land at

52-55 Friar Street
&12 Greyfriars Road

Reading

INTRODUCTION
PROPOSALS
FEEDBACK

Introduction

This website has been set up following the circulation of a consultation leaflet to share our proposals. The site is located within Reading Town Centre near to the corner of Friar Street and Greyfriars Road.

It is owned by Aviva Investors who intends to redevelop the site and provide a residential scheme with commercial and office space on the ground floor fronting onto both Friar Street and Greyfriars Road.

SITE PLAN

52-55 &12

Land at

52-55 Friar Street
&12 Greyfriars Road

Reading

INTRODUCTION
PROPOSALS
FEEDBACK

Proposals

The proposals seek to provide approximately 140 residential apartments and around 620 sq m of commercial/retail floorspace. The scheme proposes to provide a range of 1, 2 and 3-bedroom units, provide around 30% affordable housing on site together with a landscaped courtyard and high quality materials.

A range of energy efficiency measures are proposed. The residential units will strive to meet 3 Star under the newly developed Home Quality Mark assessment, which replaces the previously adopted Code for Sustainable Homes and the proposed retail unit will strive to achieve a BREEAM rating of Very Good.

The scheme seeks to enhance the appearance but also improve the quality of the built and landscape environment to a site which lies within a town centre.

THE SITE AS PROPOSED

52-55 &12

Land at

52-55 Friar Street
&12 Greyfriars Road

Reading

INTRODUCTION
PROPOSALS
FEEDBACK

Feedback

Thank you visiting the website and we hope you found it useful and informative. Please take a moment to fill in the feedback form or alternatively email your response to sarah.dawson@bartonwillmore.co.uk.

Your views are important to us and will be taken into consideration prior to the submission of the planning application to Reading Borough Council. In order to ensure that we are able to take your comments into account we would be grateful if your comments could be provided by Monday 14th November 2016.

1. Do you support the proposals?

- Yes
- No
- Undecided

2. What do you like about the plans for the redevelopment of the site?

- Regeneration of the site
- Residential accommodation (apartments)
- All of the above
- Other (please state below, max 4,000 characters)

Add comment..

3.Do you have any comment to make on the type of building materials shown? (max. 4,000 characters)

Add comment..

4.Do you have any other comments you wish to make in relation to the plans presented? (max 4,000 characters)

Add comment..

Thank you for taking time to complete this feedback form.

SUBMIT

BARTON WILLMORE