

Technical Response: Class C1 Aparthotel Development at 136-137 Friar Street

1. This note is to respond to consultation queries raised by Environmental Protection Officers at Reading Borough Council, in connection with the proposed Class C1 aparthotel development at 136-137 Friar Street – application reference 231266.
2. Each query is set out in blue italic text, with the applicant's response as informed by its technical consultant team in line below.

Background

3. Relevant background includes that:
 - An Environmental Noise Assessment, prepared by Sustainable Acoustics, was submitted with the planning application, which concludes that:
 - o noise mitigation measures are necessary to achieve the desirable internal ambient levels;
 - o recommended mitigation is for thermal double glazing and a mechanical ventilation with heat recovery (MVHR) system for all hotel rooms;
 - o the MVHR system should not yield higher levels of noise internally;
 - o with mitigation, the proposed development will provide a suitable environment of future occupiers of the hotel and would not be detrimental to living conditions of nearby existing residents.
 - An Air Quality Assessment, prepared by Air Quality Consultants, was submitted with the planning application, which concludes that:
 - o the calculated 2025 annual mean NO₂ concentration that future occupiers will be exposed to is 29.5 µg/m³, which is below the annual mean NO₂ objective of 40 µg/m³.
 - o there have also been no exceedances of the PM₁₀ and PM_{2.5} objectives within the borough in recent years;
 - o future occupiers and users of the proposed development will experience acceptable air quality;
 - o the proposed development is consistent with the National Planning Policy Framework, being appropriate for its location in terms of the air quality conditions for future occupiers. It will not affect compliance with relevant limit values or national objectives. The proposed development is also consistent with Policy 'EN15 Air Quality' of Reading Borough Council's Local Plan.

Response to Queries

4. Queries from Environmental Protection Officers:

Noise

The noise assessment proposes certain glazing and ventilation for the front and rear facades; however, the rear façade is affected by plant noise therefore a penalty should be considered for non-anonymous noise. Is

the front affected by night-time music noise? The ventilation strategy has not been confirmed in the report, has this now been finalised?

5. With regard to sound reduction at the rear facade, a total of 24 dB is required before considering any penalty. Typically, the strictest penalties that would be applied to very distinctive plant noise character would be 6 dB, as per BS 4142, and would only be higher for very impulsive plant noise.
6. Whilst the character was not considered highly distinctive when observed subjectively, the 6 dB can be applied for a worst-case. Once this is taken into account, 30 dB becomes the target level difference for facades at the rear. As MVHR is proposed for the development, glazing can be specified to exceed this 30 dB target level by a good margin.
7. With regards to music noise at the front, none was observed specifically whilst on site, though it is possible there is some during late evening hours. The front requirement is driven by maximum noise levels which provides a criterion 5-8 dB higher than what it would otherwise be when only considering measured continuous day/night-time noise levels. Meeting the maximum requirement would therefore yield suitable overall absolute ambient levels for 'anonymous' noise. Whilst it is noted that music noise can have distinctive character and temporal variations, any hypothetical music noise may not necessarily be inaudible, but it would be expected to be at least 5 dB lower than the requirements for internal resting/sleeping levels suggested in BS 8233.
8. It is expected that development will be subject to conditions to secure final acoustic attenuation details of glazing along with the MVHR system.

A suitable noise limit has been proposed in the assessment, which is stated to be achievable, however the actual plant to be installed should be assessed in case mitigation is required that affects the proposed plans.

9. Final details and specification of the plant to be installed as part of the development are not currently available, typical for many projects and consistent with RIBA stages of design. Therefore it would be reasonable to impose a condition on the planning permission to require an appropriate BS4142 assessment of the plant and acoustic attenuation to ensure its rating level is sufficiently below background level. This is common with many other schemes.

Air Quality

The air quality assessment demonstrates that the air quality at the site is not likely to exceed the objective limit values therefore no mitigation is required. However, as the development has proposed to incorporate mechanical ventilation, further details should be submitted to confirm the location of the air intakes as this should avoid the more polluted Friar St façade.

10. It is recognised that it is best practice to locate the air intakes at roof level, away from road traffic pollution. Given sufficient floor to ceiling heights to allow for horizontal ducting, and alignment of hotel rooms on each floors, the architecture of the scheme would readily accommodate the MVHR system and allow for air to be taken from the rear of the building.

The air quality assessment concludes that as this will be a car free development, there should not be a negative impact on air quality as a result of the development. However, the impact of the use of taxis to the site should be considered.

11. The site is located in an extremely accessible location, within the town centre, entirely suitable for hotel development. Against the large number of existing taxis in the town centre, which regularly travel along Friar Street, the modest scale of development would not have a material increase in vehicles.
12. A significant number of trips are expected to be by walking and public transport.

13. Relevant too is Reading Borough Council's 'Hackney Carriage and Private Hire Vehicle Strategy 2023-2028'. This requires that all cabs and private hire vehicles are to be electric or hybrid by 2028, as well as prioritising access to taxi ranks for low-emission and electric-only vehicles in the future.

[14/03/24]