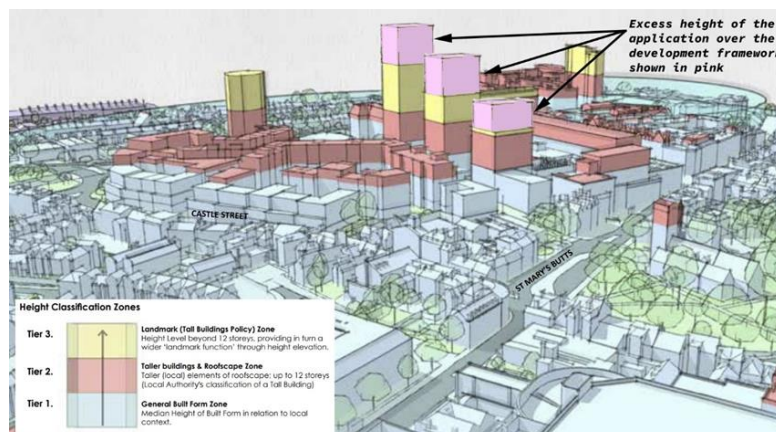
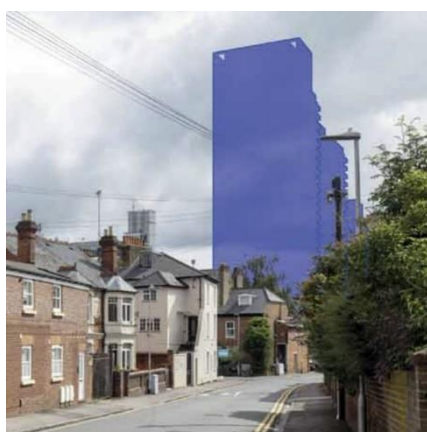


Planning Application 240173: Broad Street Mall (BSM), Reading, RG1 7QG

Comments by: Baker Street Area Neighbourhood Association (BSANA)



Images showing the significant detrimental visual impact of the proposal on the adjacent conservation areas and historic heart of Reading and the huge increases in height over the development parameters.

BSANA strongly objects to planning application 240173 and recommends its refusal on the following grounds:

The application is contrary to both the main criteria of the corresponding development framework and several key planning policies.

Height, Massing and Impact

- The application proposes towers that substantially exceed the maximum heights specified in the development framework, the proposed tallest tower reaches 87m above the BSM (142.855m AOD) and is 45% greater in height than the 60m maximum specified (115.590m AOD). This would result in a 30-storey tower block overshadowing BSANA's low rise neighbourhood.
- The proposed towers are on an entirely different scale to those envisaged by the development framework, BSANA calculates them to be up to 73% larger than permitted under the extant consented application, which were scaled down to adhere to the development framework.
- The applicant justifies the proposed increase in height in paragraph 3.101 of Broad Street Mall Environmental Statement: Volume 1 - Chapter 3 Alternatives and Design Evolution ***"The maximum height of the buildings has increased during the design process of the Proposed Development from the Extant Consent. The maximum height presented in Pre-Application Meeting 1 was 135.250m AOD, however, following feedback from RBC which welcomed further increases in height, the height of the Proposed Development was increased to 142.855m AOD (Figure 3.8). The proposed AOD of the tallest tower is 142.855m, which is approximately 20m below the 163m of the tallest building of Plot C of the Station Hill Cluster"***.
- The applicant's justification for the height and scale increases over the development parameters is at odds with the very foundations of the UK's planning system. The determination of the

development parameters and of planning policy were the result of following democratic due process and can't be overridden during private pre-application meetings.

- The applicant's development site sits between two conservation areas and next to the historic heart of Reading. This sensitive setting was given very careful consideration during the creation of the development framework and many interested parties were involved in helping to determine the development parameters by assessing the impact of building heights and scale.
- Reading's planning policy and the development framework need to be respected by all parties and due process needs to be followed. Applicants should adhere to planning policy or guidelines and planning officers should judge applications by it. The pre-application process should be used to help applicants adhere to planning policy regardless of external factors.
- This proposal if consented would have a significant detrimental visual impact on the setting of the historic heart of Reading and on BSANA's conservation area, it would overshadow large parts of two conservation areas and dominate the skyline for miles around, it could also set a new precedent regarding the permitted height and scale of buildings in the entire Minster Quarter development area.

Open Space / Play Areas

- This application provides inadequate provision of open space and play areas for the proposed 644 dwellings and it fails to meet policy requirements.
- The development site sits in an area significantly deprived of public open space and play areas.

Environment

- This application requires the demolition of the southern section of the BSM which carries with it a significant environmental cost. The development framework envisaged and the extant consented application was to build on top of the BSM without this demolition.

Affordable Housing

- The proposal provides just 7.5% affordable housing which is a quarter of the 30% policy requirement. Reading has an acute lack of truly affordable housing, this application provides 145 fewer dwellings for key workers and for those on the social housing register. Meeting policy requirement helps create a proper mixed community.

Mitigation

- This proposal is for a large, gated community that sits within the centre of Reading, targeted at well paid professionals. The applicant seeks to impose significantly on Reading's skyline, but offers nothing in return for neighbouring communities and to Reading as a whole. BSANA expects an open development that helps foster greater community cohesion and that offers substantial long-term benefit to the wider community of Reading.

Potential Conflicts of Interest

- RBC has a long term lease on much of the applicant's development site and has selected the applicant as their development partner for their Minster Quarter development site. BSANA is concerned that the application may be viewed more favourably than if this relationship didn't exist, especially given the strategic importance of the Minster Quarter to RBC's own plans. Even with stringent safeguards in place it will be very difficult for planning officers to be entirely isolated from any unintentional undue influence whether external or internal. Only by adhering to planning policy and development parameters can this risk said to be truly mitigated, otherwise consideration should be given to independent scrutiny from a planning inspector/ombudsman.

1 Introduction

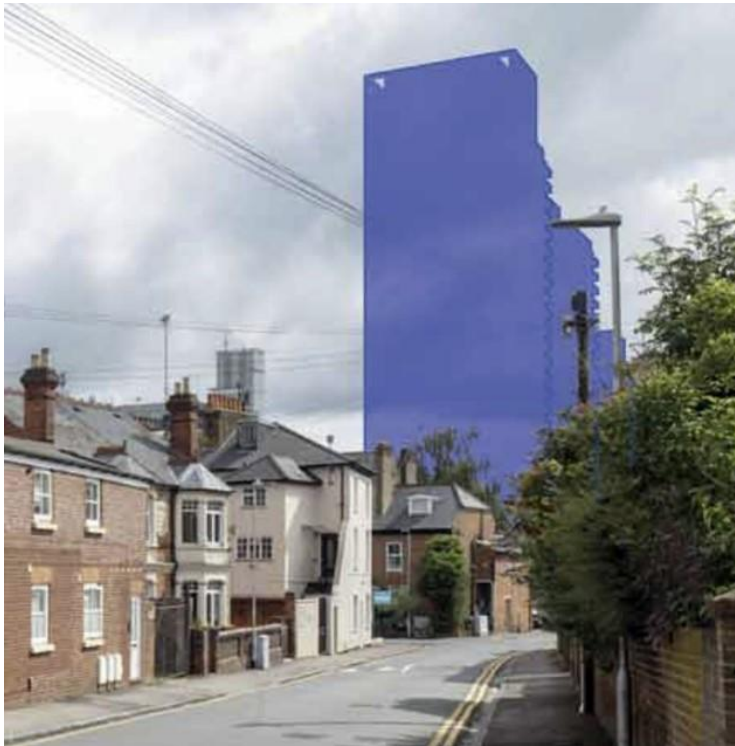


Figure 1: View of the proposed development from the corner of Jesse Terrace and Baker Street (credit: Environment Impact Assessment)

- 1.1 The Baker Street Area Neighbourhood Association (BSANA) represents a diverse community with a rich cultural heritage in an area located directly to the west of the proposed development site. The BSANA neighbourhood is almost entirely contained within the Castle Hill/ Russell Street/Oxford Road Conservation Area (CHRSORCA) which is listed on Historic England's Heritage at Risk register due to loss of character features. The proposed enlarged development would have a significant visual impact on CHRSORCA residents, overshadowing large parts of the Conservation area and would dominate the skyline.
- 1.2 The Broad Street Mall (BSM) development site sits next to the historic heart of Reading. As shown in figure 2 below, it lies between two conservation areas, the CHRSORCA to the west and Saint Mary's Butts/Castle Street Conservation Area (SMBSCA) to the east and south. Neighbouring historic assets include the statutory listed Reading Minster(Grade I), Saint Mary's Church (Grade II*) and multiple Grade II buildings.



Figure 2: Figure 3: BSM development site sits next to two conservation areas

- 1.3 The BSM development site represents a significant share of the development area referred to as the Minster Quarter Area (MQA), also included within the MQA is the old civic centre site, the police station (who are currently relocating from this site) and Reading Magistrates' Court and Family Court (who have not declared an intention to relocate).
- 1.4 Due to the historic importance of the area surrounding the MQA, the challenging development site and the need for a coherent design and implementation strategy from the different owners, the Minster Quarter Area Development Framework (MQADF) was produced by RBC.
- 1.5 The boundaries of the MQADF are given in figure 3 below.

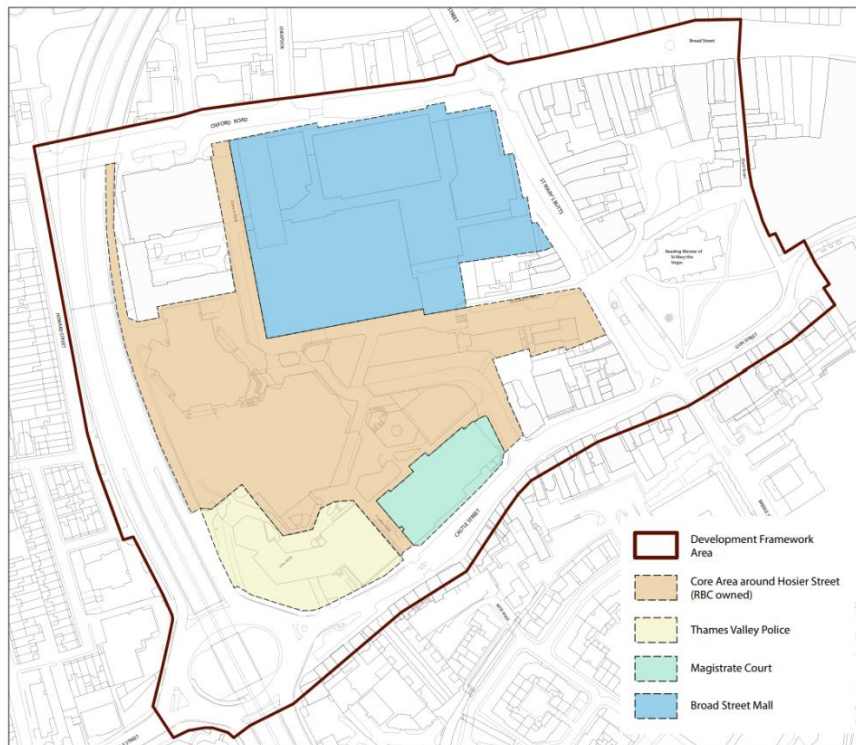


Figure 3: Minster Quarter Area Development Framework Boundary and Ownership. Image from MQADF.

- 1.6 BSM is owned by AEW, a substantial \$86.5 billion international property investment company, the civic centre site is owned by RBC and the police station site is owned by S2 Estates, a UK based development company. RBC has a long term leasehold agreement on the car park within the BSM which represents a significant part of the BSM development site .
- 1.7 BSM has extant (current existing) consented planning applications for the following developments:
 - 1.7.1 Application 182137 - 422 dwellings within 3 new towers and an additional building on top of the BSM.
 - 1.7.2 Application 211177 - 48 dwellings through the conversion of the existing Fountain House office building that also sits on top of the BSM.
- 1.8 Application 182054 is an expired consented application for a 101 bedroom hotel.
- 1.9 Application 240173 seeks to replace 182054 and 182137.
- 1.10 Consented application 182137 falls at the outer limits of the MQADF in terms of development parameters and the expected number of dwellings.
- 1.11 Neither RBC or S2 Estates have submitted planning applications. But RBC have indicated a development of over 600 dwellings and a 102 bed hotel and S2 Estates have indicated a development of 260 dwellings.

2 Scale and Height

2.1 Scale

- 2.1.1 This application seeks a huge 53% increase in the number of dwellings over the current consented application, from 422 to 644.



Figure 4: Building identification. Image from application.

- 2.1.2 The number of buildings remains the same at four, the buildings are identified by sites A , B, C and D/E. Sites as identified in figure 4 above, A, B and C are tower blocks that sit upon the BSM and site D/E is a smaller building within the site.

Building	Extant	Proposed	% Increase
Site A	148	246	66%
Site B	134	209	56%
Site C	98	154	57%
Site D/E	42	35	-17%
Total	422	644	53%

Figure 5: Increase in proposed number of dwellings by site over current approved

- 2.1.3 Figure 5 above shows that towers sites A, B and C see a substantial increase in the number of dwellings proposed, whereas site D/E sees a decrease in the number of proposed dwellings.
- 2.1.4 The significant increase in the proposed number of dwellings per tower is directly reflected in the increased size of the tower blocks.

Dimension	Extant	Proposed	% Increase
Height (m)	64.86	87.27	35%
Width (m)	25.00	27.50	10%
Depth (m)	22.50	26.25	17%
Foot print (sqm)	563	722	28%
Volume (m³)	36484	62994	73%

Figure 6: Dimensions of Site A above BSM (the width and depth have been approximated from the applicant's designs)

- 2.1.5 Figure 6 above shows a significant increase in all dimensions of the proposed site A above the BSM over the consented application.
- 2.1.6 Please note that height is calculated from the top of the BSM rather than street level, so as to calculate the additional massing over the approved application as the BSM is a monolithic structure. Also of note is that the towers in the consented application sit upon the BSM whereas the towers in the proposal start from street level and require the demolition of the southern edge of the BSM.

2.2 Height

Site	Extant			Proposed			Increase			
	Height (m)		Storeys	Height (m)		Storeys	Height		Storeys	
	AOD	Above Street		AOD	Above Street		Metres	%	Storeys	%
A	120.45	75.35	23	142.86	97.76	30	+22.41	30%	+7	30%
B	114.45	69.35	21	130.36	85.26	26	+15.91	23%	+5	24%
C	103.00	57.90	18	106.18	61.08	19	+3.18	5%	+1	6%

Figure 7: Tower Heights

- 2.2.1 Site A is now proposed to reach 30 storeys above Düsseldorf Way (street level) a 30% increase over the 23 storeys of the current consented application. With each additional storey being roughly 3.2m in height.
- 2.2.2 Above Ordnance Datum (AOD) is a measure roughly equivalent to sea level, the AOD heights at the corner of Düsseldorf Way for site A is 45.1m AOD street level and 55.59m AOD at the top of the BSM.

2.3 Permitted Development Parameters – significantly exceeded in the planning application

- 2.3.1 The MQADF sets out specific development parameters for the BSM site, restricting towers within the MQA to a maximum of 20 storeys and a maximum height of 60m (20 storeys at 3m each). An exception was given to BSM in that it was expected that the towers would sit upon the existing structure, so the storeys would be counted from the top of the BSM rather than street level. The MQADF adds a further condition that the towers should reduce proportionally in height from site A to site C i.e. towards Reading Minster, from 20 storeys to an implied 10 storeys above BSM, with site B being 15 storeys above BSM.

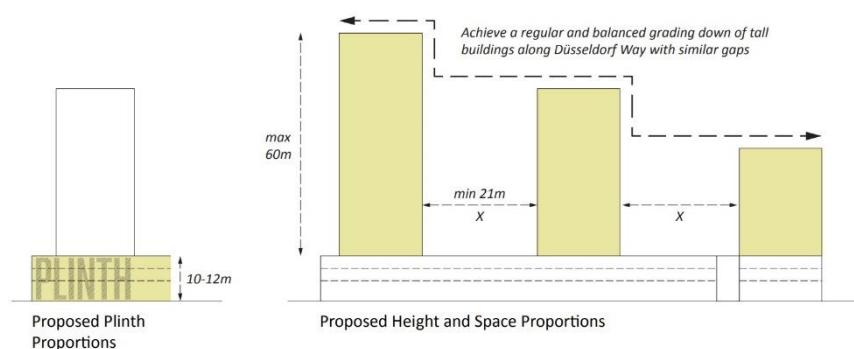


Figure 8: MQADF - BSM maximum permitted development height and grading down.

- 2.3.2 The MQADF states ***“A threshold of 20 storeys above podium is considered the maximum permissible height for tall buildings generally within the site and this should be considered as a maximum to which other buildings step up to.”*** ***“Slender building forms are encouraged, for reasons of overall skyline appeal, reduction of overshadowing and improvements to distances between blocks.”***
- 2.3.3 The MQADF specifically demands that careful consideration be given to the height and massing of the towers due to the potential visible harm to the neighbouring Conservation Areas, ***“applications should demonstrate that the height, layout and massing of development has been designed to avoid or minimise harm to the character or appearance of the adjacent conservation areas, including impacts on their settings.”*** ***“The massing and orientation of these structures will need to minimise impacts on local views, daylighting and shadowcasting.”***

- 2.3.4 The MQADF provides indicative number of dwellings from each development site within the MQA. The BSM is given a guide of between 280 to 420 dwellings. The extant consented application falls at the outer bounds of the guide with 422 dwellings. This proposed application seeks an over 50% uplift over guide with 644 dwellings, there are also an additional 48 dwellings to be potentially provided from the approved Fountain House application, thus there could be almost 700 dwellings within the BSM site, almost double the anticipated number.

Site	MQADF		Proposed		Deviation			
	Height (m)	Storeys	Height (m)	Storeys	Height		Storeys	
	Above BSM	Above BSM	Above BSM	Above BSM	Metres	%	Storeys	%
A	60	20	87.27	27	+27.27	45%	+7	35%
B *	45	15	74.77	23	+29.77	66%	+8	53%
C *	30	10	50.59	16	+20.59	69%	+6	60%

Figure 9: MQADF height parameters v proposed (*parameters for sites B and C are implied from the MQADF)

- 2.3.5 Figure 9 above shows a substantial deviation of the proposal from the permitted development parameters as provided within the MQADF. So much so that even site B is considerably higher than the permitted 60m and site C is now just 10m beneath the permitted height.

Site	MQADF		Extant		Deviation			
	Height (m)	Storeys	Height (m)	Storeys	Height		Storeys	
	Above BSM	Above BSM	Above BSM	Above BSM	Metres	%	Storeys	%
A	60	20	64.86	20.00	+4.86	7%	+0	0%
B *	45	15	58.86	18.00	+13.86	31%	+3	20%
C *	30	10	47.41	15.00	+17.41	58%	+5	50%

Figure 10: MQADF height parameters v extant consented application

- 2.3.6 Figure 10 above shows that the extant consented application site A is compliant with MQADF in terms of the number of storeys with a marginal deviation in terms of overall height due to each floor being 8% higher than 3m. BSANA believes that sites B and C were outside the MQADF expectations as both the number of storeys and heights weren't explicitly provided but were implied and that there was a misinterpretation of these parameters as witnessed by the significant negative visual impact from the Environment Impact Assessment (EIA) of the application versus those provided within the MQADF.

2.4 Planning Applications Committee Report for Consented Planning Application 4 April 2020

- 2.4.1 Planning consent was provided after changes were made to heights and scale of the initial application, tower A was reduced by 2 storeys.

- 2.4.2 Section 6.19 – ***“Avoid bulky, over-dominant massing; the towers have been reduced in height and width during the course of the application to seek to achieve a slender vertical design considered to avoid bulky, over dominant massing”***
- 2.4.3 Section 6.20 ***“It is accepted that not every criterion is met in full but the majority are and there is a suitable policy basis for tall buildings as proposed in this location. It is also noted that the height of Block A has been reduced to 20 stories to accord with the MQADF. It is therefore considered that the amended scheme with the scale of the proposed tower at Site A reduced to in height to within 5m of the maximum anticipated by the MQADF has enabled officers to accept that on balance the proposal sufficiently meets policy requirements to be recommended for approval.”***

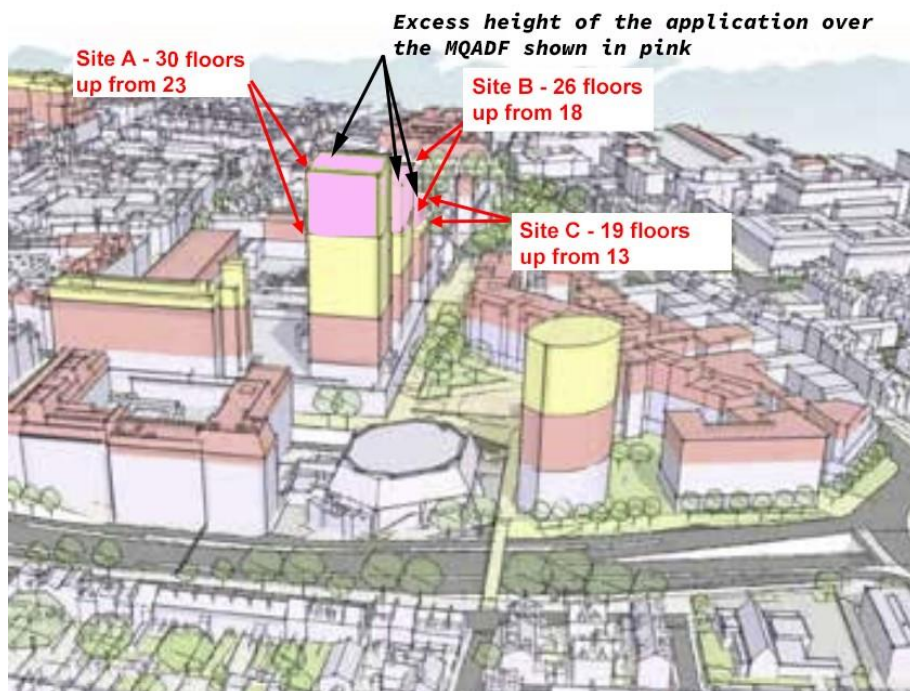


Figure 11: The areas in pink above the towers have been added by BSANA to show how much the applicant exceeds the MQADF permitted heights of the towers (the images do not show the increase in mass of the towers). Aerial view above Baker Street. Image taken from MQADF and modified by BSANA.

2.4.4 The impact on the aerial view of the additional storeys is clearly demonstrated in figure 11.



Figure 12: Tower height deviations displayed in pink by BSANA. Note that the significant increase in the footprint of the towers is not represent in this image and the proposed towers are significantly more bulky. Image taken from MQADF and modified by BSANA.

2.4.5 Figure 12 above shows the dominating effect that the proposed towers will have on the historic heart of Reading and will be visible for miles around.



Figure 13: The area highlighted in red by BSANA shows the increase in scale of the proposed towers compared to the extant consented application (based on an image from the EIA from the end of Baker Street)

- 2.4.6 The significant visual impact of up to 73% increases in scale of the proposed towers from the top of the BSM can clearly be seen in figure 13 above, where with the extra bulk of the towers they start to merge into one from many angles.
- 2.4.7 BSANA supports Berkshire design review panel paragraph 3.2 ***“We do however think the towers could be more elegant, and we are concerned that from some viewpoints the southern elevation will read as a single, continuous façade, making the towers read as one mass.”***

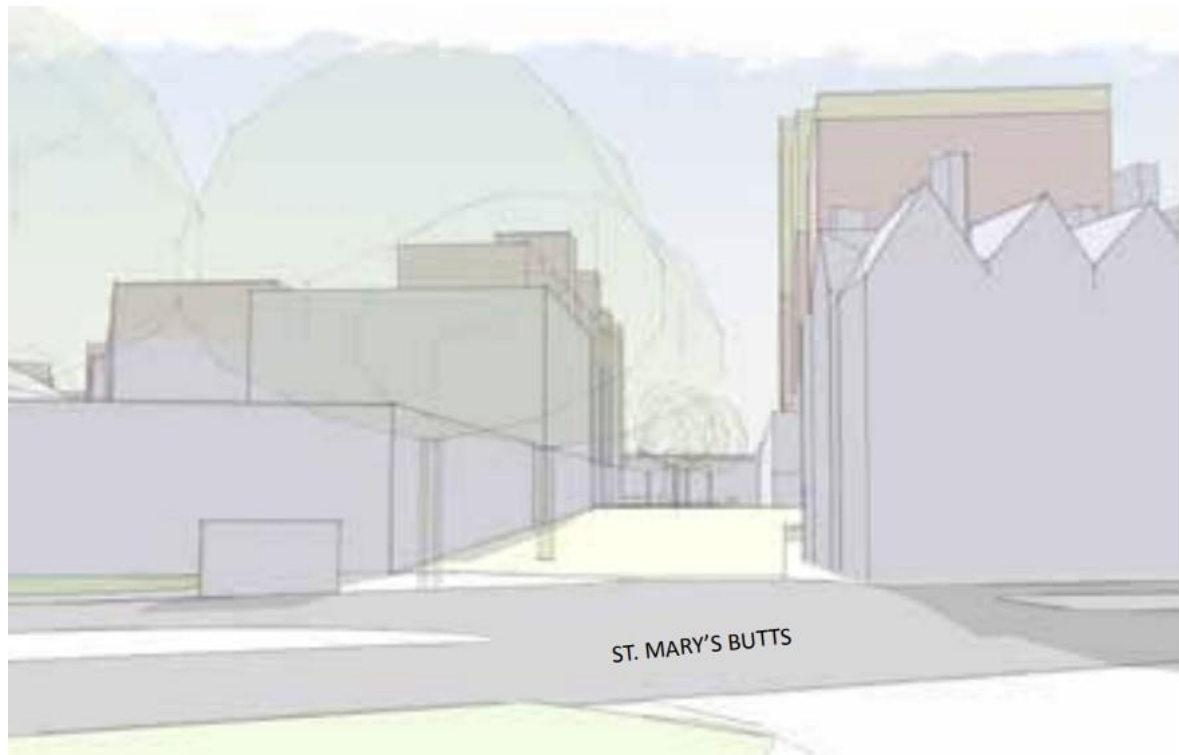
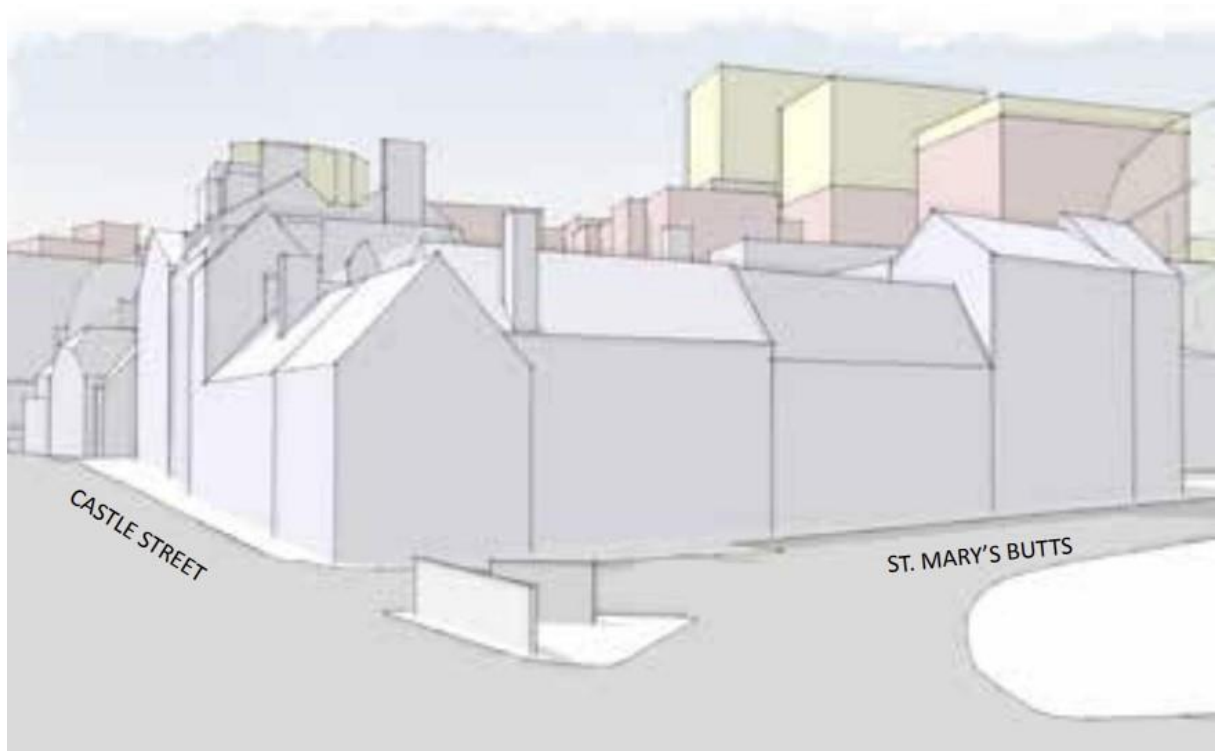


Figure 14: The MQADF goal was to minimise the visual impact of the towers from the front of Grade I listed Reading Minster



Figure 15: The visibility of the proposed towers from the steps of Grade I listed Reading Minster – image EIA



VIEW FROM CASTLE ST / ST. MARY'S BUTTS

Figure 16: MQADF require towers that don't dominate the views from the CA



Figure 17: An image from the proposals EIA clearly demonstrating the jarring contrast between the overbearing BSM towers and the historic heart of Reading.

- 2.4.8 Figures 14 to 18 show significant visual harm caused by the proposed towers when viewed from within the SMBSCSA and the effect of the addition of between 6 to 8 storeys to the tower blocks, over the MQADF development parameters. If 7, 8 and 6 storeys are removed from towers A, B and C respectively and there is a reduction of their footprints then the impact of the towers would be significantly reduced (adhering to the MQADF).



Figure 18: View towards the grade II* listed Saint Mary's Church from Castle Street, showing the dominant massing of the proposal on the setting from Castle Hill - image from EIA

2.5 Historic Context - Reading's Historic Area Assessment (HAA) (Approved March 2023)

- 2.5.1 ***“St Mary’s Butts/Castle Street Conservation Area forms the most historic area in Reading, with a history of settlement stretching back to the Saxon period. The Reading Minster of St Mary the Virgin is the parish church, together with listed structures surrounding it and the churchyard provide the focal point for this character area.”***
- 2.5.2 The establishment of Reading as an urban settlement is largely unclear, but it is noted in the Anglo-Saxon Chronicle of 870-871 AD categorised as a Vil which is the smallest administrative unit, a hoard of Saxon pennies dating to circa 875 AD was found in a coffin dated to the 9th century in the graveyard of Reading Minister. Clearly indicating the claim of the Reading Minister being at the historic heart of Reading.
- 2.5.3 By the 11th century Reading had achieved elements of the ‘borough’ status. Available evidence suggests the late Saxon Borough was probably focused around St Mary’s Butts, where the two main trading routes crossed (Oxford to Winchester/ Southampton and London to Bath).
- 2.5.4 The HAA identifies many key views, these views are adversely affected by the proposal both within the SMBSCSA and from the edges of the CHRSORCA.

2.6 Policy Breaches

- 2.6.1 EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT – ***“All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located.”***
- 2.6.2 EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT – ***“a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space); b. Sensitivity to historic context;”***
- 2.6.3 CR10:TALL BUILDINGS – ***“Avoid bulky, over-dominant massing”. “Conserve and, where possible, enhance the setting of conservation areas and listed buildings”. “Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and nighttime lighting;”***
- 2.6.4 National Planning Policy Framework (NPPF) Paragraph 201:.. ***“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”***

3 Open Space / Play Areas

3.1 Figure 19 below shows an increase in family sized 3 bedroom dwellings, yet the proposal fails to provide sufficient and suitable open space and play areas for a development of this size, despite the development site existing in an area deprived of both, of note is BSANA has no public open space or play areas within its boundaries.

Bedrooms	Extant	Proposed	% Increase
1	201	298	48%
2	199	297	49%
3	22	49	123%
Total	422	644	53%

Figure 19: Number of dwellings v bedrooms

3.2 Figure 20 below highlights that the closest public play areas are approximately 1 kilometre walk away from the development site. Play areas are accessed by crossing busy roads. The proposal highlights Reading Minster's grave yard and County Lock as seating areas, but there is currently only a single bench in each location, this compares to the 644 dwellings of the development site.

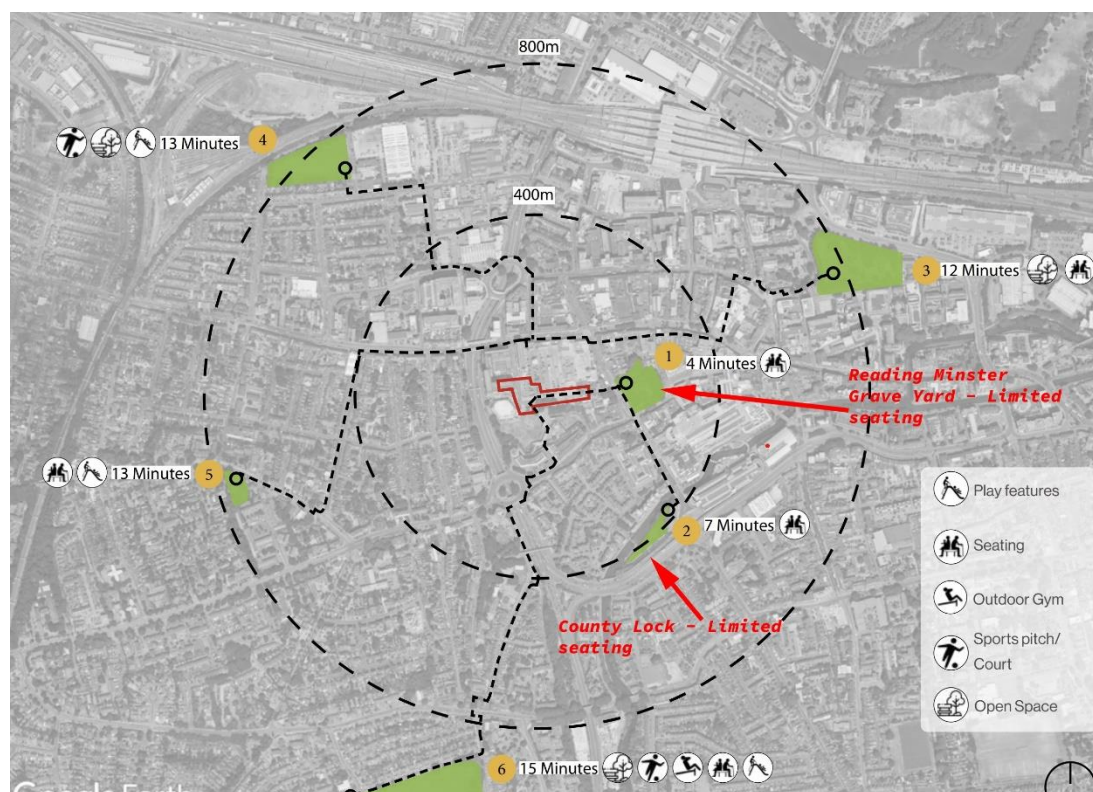


Figure 20: Proximity of open space and play areas from the development site, highlighting very limited seating of nearby greenspace – image from the application modified by BSANA

3.3 Private open space provided within the proposal is both fragmented and minimal, much of it will be in shade during the day due to being located between the towers. Doorstep and fixed play to private terraces (0-11 years) - 440.95 sqm and informal play-on-the-way in public realm (0-11 years) - 174.30 m2, so only 615.25 m2 for 644 dwellings has been identified next to or within the site.

- 3.4 The COVID-19 lockdowns which occurred after the extant consented application was approved, further highlighted the importance of public open space and child play areas on mental health and quality of life for residents. The climate emergency also highlights the need to connect people with nature. Of note is that this application offers no mitigation in terms of trying to address the deprivation of public open space and play areas. It simply references the use of S106 monies, so passes the problem onto RBC without seeking to address it.



Figure 21: Internal greenspace at level 1.

- 3.5 Figure 21 above highlights that given the size and proximity of the towers to each other that much of the proposed internal open space at level 1 of the sites will be in the shade throughout the day and how inadequate the play areas are for such a large development with no public play areas nearby. Building D's open space would get even less sunlight.

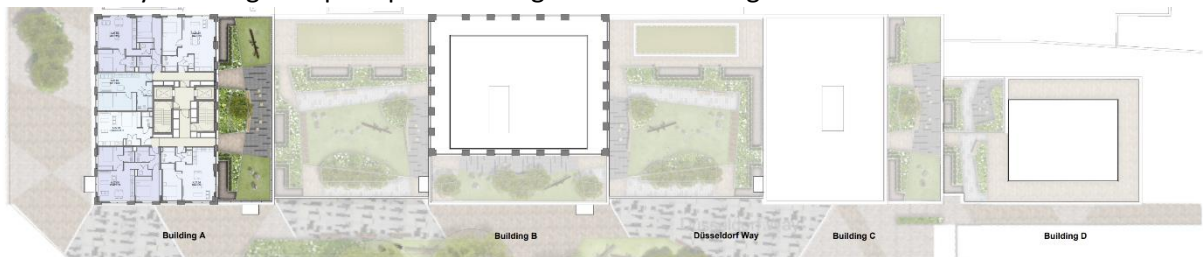


Figure 22: Internal space at roof level 27

- 3.6 Figure 22 above shows internal space at level 27 of site A. Internal open space is provided 2 to 3 floors below roof level for each of the towers (at levels 27, 24 and 17 for towers A, B and C respectively). Given how exposed these open spaces at their respective heights then their suitability for use will be restricted to windless days.

- 3.7 Berkshire design review panel, paragraph 4.6 ***“The play spaces are very small and difficult to access. Thought needs to be given to how these spaces are used and accessed. It should be possible for children to go from an apartment to a play space unaccompanied, but the convoluted route prohibits this. Locating the play space at street level, as Elephant Park in Southwark, London, would make it more accessible.”***

3.8 Gated Community

- 3.9 Having open spaces that are private to a development creates a gated community and provides a barrier to fostering wider community cohesion. In this case the proposal also fails to help alleviate the significant open space and play area deprivation that exists for the immediate neighbouring communities.

3.10 **Loneliness**

3.11 Local open public spaces allow for repeated interactions to take place and friendships to form and for feelings of loneliness and isolation to diminish and this proposal fails to address this need.

3.12 **Policy Breaches**

3.13 EN9: PROVISION OF OPEN SPACE – *“On sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new provision will be sought. Development must ensure satisfactory provision of children’s play areas and neighbourhood parks.”* – *“It is essential that new developments make provision for open space to meet the needs of the residents/occupiers of the development.”*. *“9 The Open Spaces Strategy states that, ‘All guidelines recommend that at least some open space for children to play, whether publicly or privately owned, be available within 100-200m of every home. This will primarily affect very high-density developments, like flats’*

3.14 EN10: ACCESS TO OPEN SPACE – *“In areas with relatively poor access to open space facilities (including as a result of severance lines), new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/or facilitate the creation or linking of safe off-road routes to parks.”*

3.15 **Mitigation**

3.16 BSANA believes that the applicant must mitigate for the public open space and play area deprivation in the local area before planning permission can be determined for this substantial proposal. Mitigation could be provided through either the decking over of the IDR or through the conversion of the entirety of the top level of the BSM car park into a landscaped/amenity area for public use. It is worth noting that figure 23 provides an approximate view of green space above the IDR in line with Reading’s 2050 Vision statement.



Figure 23: Decking over of the IDR could provide much needed public open space and help contain vehicle pollution.

3.17 BSANA fully endorses Berkshire Design Review Panel paragraph 1.4 *“One of the most impactful changes would result from the conversion of the parking deck into a new amenity space to benefit residents of this development and the wider community. If this is not feasible, recommend working with the council to reduce the quantum of car parking. This would have immediate benefit to residents living in the north-facing apartments.”*

3.18 Figure 24 below shows an almost empty car park at roof level. BSANA has visited this level of the car park on different days of the week and at various times of the day and find that this low usage is typical. This space could provide ample amenity space not only for residents, but also help address public play area and open space deprivation in the area. It would also help to address the contradiction of having a primarily carless community surrounded by a public car park.



Figure 24: The BSM Car Park is often devoid of cars at roof level and offers significant opportunity for providing amenity space for both residents and the wider community.

3.19 Figure 25 below indicates that the BSM car park is currently promoted by RBC to commuters who park there all day, rather than those who use the BSM shopping facilities, this again signifies that the upper deck car park could be used as amenity space if the BSM becomes a primarily residential site as this promotion is at odds with a residential location.



Figure 25: Promotion of the BSM car park to commuters i.e. drivers not using BSM as their destination.

4 Affordable Housing

- 4.1 There is an acute shortage of affordable housing in Reading.
- 4.2 The application provides for only 7.5% affordable housing, the MQADF expected the site to produce a policy compliant 30%. Instead of providing almost 200 affordable dwellings the application seeks to provide less than 50 dwellings out of a total of 644 dwellings.
- 4.3 The application is a Built To Rent (BTR) development of which a number have recently been constructed or are under construction in Reading.

BTR Development	Studio			1 Bedroom			2 Bedroom			3 Bedroom		
	Rent PCM	Rent PA	Min. Income	Rent PCM	Rent PA	Min. Income	Rent PCM	Rent PA	Min. Income	Rent PCM	Rent PA	Min. Income
Station Hill	£1,495	£17,940	£44,850	£1,650	£19,800	£49,500	£2,010	£24,120	£60,300	£2,895	£34,740	£86,850
Thames Quarter	£1,300	£15,600	£39,000	£1,600	£19,200	£48,000	£1,995	£23,940	£59,850	£2,600	£31,200	£78,000

Figure 26: BTR - Rental starting costs per dwelling type and required minimum income

- 4.4 Figure 26 above shows rental prices within the Station Hill and the Thames Quarter BTR developments, the table also shows standard affordability criteria of an income that is 2.5 times rent. BSANA would expect BSM rental charges to be similar to those for Thames Quarter given their respective locations.
- 4.5 Affordable housing is available to key workers and to those who meet social housing requirements. Currently only 10% of those on the social housing register are allocated affordable housing each year
- 4.6 Figure 27 below shows NHS pay grades for 2023 – 2024, illustrating that current Reading's BTR developments are outside the typical affordability criteria for staff on band 6 and lower.

Band	Staff include	Years Exp.	Pay	Years Exp.	Pay	Years Exp.	Pay
2	Healthcare assistants, receptionists, phlebotomists, administrative staff, domestic staff and catering staff.	0-2	£22,383	2+	£22,383		
3	Clinical support workers, therapy assistants, pharmacy assistants, administrative workers and clerical staff.	0-2	£22,816	2+	£24,336		
4	Nursing associates, associate practitioners, pharmacy technicians, bed managers and senior clerical staff.	0-3	£25,147	3+	£27,596		
5	Nurses, newly qualified midwives, paramedics, physiotherapists, occupational therapists and speech therapists.	0-2	£28,407	2-4	£30,639	4+	£34,581
6	Junior sisters, charge nurses, midwives, paramedics, newly-qualified pharmacists and biomedical scientists.	0-2	£35,392	2-5	£37,350	5+	£42,618
7	Ward sisters, charge nurses, senior physiotherapists, occupational therapists, pharmacists and senior midwives.	0-2	£43,742	2-5	£45,996	5+	£50,056
8a	Matrons, advanced clinical practitioners, service managers and speciality leads.	0-5	£50,952	5+	£57,349		
8b	Psychologists, lead pharmacists and lead clinicians.	0-5	£58,972	5+	£68,525		
8c	Heads of clinical service, senior HR managers, tactical response leads and service owners	0-1	£70,417	5+	£81,138		
8d	Deputy directors of clinical services, deputy chief nurse, consultant clinical scientists and departmental heads.	0-5	£83,571	5+	£96,376		
9	Nurse consultants, director of clinical services and chief nursing officers.	0-5	£99,891	5+	£114,949		

Figure 27: NHS Pay Grades with years' experience 2023 – 2024 – unaffordable to those highlighted in orange

NJC pay spine 2023-24

SCP	£ per annum	£ per hour	SCP	£ per annum	£ per hour
1	Deleted wef 01 Apr 23		23	£32,076	£16.63
2	£22,366	£11.59	24	£33,024	£17.12
3	£22,737	£11.79	25	£33,945	£17.59
4	£23,114	£11.98	26	£34,834	£18.06
5	£23,500	£12.18	27	£35,745	£18.53
6	£23,893	£12.38	28	£36,648	£19.00
7	£24,294	£12.59	29	£37,336	£19.35
8	£24,702	£12.80	30	£38,223	£19.81
9	£25,119	£13.02	31	£39,186	£20.31
10	£25,545	£13.24	32	£40,221	£20.85
11	£25,979	£13.47	33	£41,418	£21.47
12	£26,421	£13.69	34	£42,403	£21.98
13	£26,873	£13.93	35	£43,421	£22.51
14	£27,334	£14.17	36	£44,428	£23.03
15	£27,803	£14.41	37	£45,441	£23.55
16	£28,282	£14.66	38	£46,464	£24.08
17	£28,770	£14.91	39	£47,420	£24.58
18	£29,269	£15.17	40	£48,474	£25.13
19	£29,777	£15.43	41	£49,498	£25.66
20	£30,296	£15.70	42	£50,512	£26.18
21	£30,825	£15.98	43	£51,515	£26.70
22	£31,364	£16.26			

Figure 28: Local government pay grades 2023-2024 – unaffordable to those highlighted in red

- 4.7 Figure 28 above shows NJC pay grades, RBC uses this to set its pay structure. A search of RBC open job vacancies on 29 April 2024, shows of 89 jobs, 10 carry a potential salary of £40,000 or more a year, thus the proposal will provide accommodation unaffordable for the majority of teachers, carers and the many other roles that much of society depends upon.
- 4.8 BTR developments in Reading appear to be targeted at young professionals with relatively high disposable incomes, this is of significant financial benefit to Reading, but the sharing of the success that this brings is realised through the supply of affordable housing and the provision of shared facilities such as open public spaces and play areas for the benefit of all.
- 4.9 The BSM currently provides many shops for cost conscience shoppers, with a new population with higher disposable incomes living directly above this structure it will provide market pressure to transition towards serving residents with higher disposable incomes.

4.10 Policy Breaches

- 4.11 H4: BUILD TO RENT SCHEMES – ***“Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.”***

5 Other

5.1 Environment

- 5.1.1 The proposal requires the demolition of the southern edge of the BSM in order to allow the towers to be constructed from street level rather than sitting on top of the BSM as is the case with the extant consented application. Thus this proposal has a far greater environmental impact than the approved application, due to the carbon footprint embodied in the existing structure and in the energy required for demolition, transportation and rebuild of a substantial structure.
- 5.1.2 The construction of the BSM took place just over 50 years ago and itself carried significant environmental cost through the demolition of historic buildings and infrastructure and in the construction of the concrete building itself.
- 5.1.3 Berkshire Design Panel paragraph 2.2 ***“Whilst we accept there are technical challenges, the decision to demolish the car park has serious implications for the sustainability of the development given the embodied carbon in the existing concrete structure.”***
- 5.1.4 The carbon footprint of building such large tower blocks is significant and a long term view must be taken to maximise their lifespan, so very careful consideration must be given to their approval. This not only comes from the very careful consideration of materials used, but also their aesthetics and how well buildings will fare the test time, so that subsequent generations don’t feel compelled to tear them down as they are a significant visual detriment to the setting in which they reside or offer an unattractive living environment.

5.2 Clean Air

- 5.2.1 The development is located near to a heavily used dual carriageway and right next to a public car park. Both sources of vehicle pollution from tyre and brake particulates and engine emissions.

5.2.2 Policy Consideration - EN15: AIR QUALITY – ***“Development should have regard to the need to improve air quality and reduce the effects of poor air quality.”***

5.3 Road Infrastructure

- 5.3.1 Reading’s road infrastructure is at breaking point in terms of its limited capacity and the increasing demands placed upon it. This development will only add to that pressure. The issues of road access during site clearance and then re-development will add a huge strain to the limited roads capable of servicing the site.
- 5.3.2 The demolition of a large number of parking spaces may negatively impact the ability to transform the top level of the BSM into an area of amenity especially as parking is a significant issue on a number of streets in central Reading.
- 5.3.3 Once developed if residents require the use of any form of road transport directly or indirectly then this will provide additional strain on the existing road infrastructure.

5.4 Car Free Living / 10 Minute City

- 5.4.1 The residents of any development that takes place within the BSM development will be primarily car free, along with many thousands of other residents from the developments that are taking place in central Reading. BSANA is concerned that Reading isn’t geared up for this new population as it does not appear to have embraced the concept of a 10 minute city. With the past closure of the central swimming pool and the imminent closure of the largest supermarket within central Reading (Aldi), this situation has worsened and there is a lack of clarity as to how this would be addressed.

- 5.4.2 BSANA would like to RBC review this concept and see what it can do to improve the provision of amenities and essential local services in central Reading to make them easily accessible by foot wherever possible.

5.5 Schools / GPs / Dentists

- 5.5.1 MQA development sites could produce well over 1500 dwellings with this proposal of 644 dwellings and an extant consented application for 48 dwellings within Fountain house along with indicative developments of 600+ dwellings from RBC and 260 dwellings from S2 Estates. This goes significantly beyond what was planned in the local plan and could overwhelm existing local services, creating a significant negative effect for existing residents.

5.6 Fire

- 5.6.1 Fire Fighter Access - The tall buildings proposed have significant access restrictions in terms of the sides that are accessible to fire fighting vehicles.
- 5.6.2 Vehicle Fire Risk – The towers are located next to a car park, vehicles whether electric or internal combustion engine, carry their own specific risks.

5.7 Wind Tunnel Effect

- 5.7.1 Queens Walk in particular suffers significantly from the wind tunnel effect, the proposed tall buildings will exacerbate the situation further.

6 Democracy, Planning Policy, Safeguards and Transparency

6.1 Context

- 6.1.1 Figure 1 in the introduction is taken from the EIA of the application, the view is from within CHRSORCA, BSANA's Conservation Area. The image has produced a shocked reaction from BSANA's residents as it clearly shows the considerable visual damage caused by placing a very large 30-storey building next to a low rise conservation area.
- 6.1.2 Upset has come from the fact that there are several layers of protection within both local and national planning policy to protect and enhance the settings of historic environments. BSANA has been involved in the democratic process to make sure that our conservation area was recognised when the MQADF development parameters were set.
- 6.1.3 Much effort, scrutiny, debate and consideration goes into the production of development frameworks and planning policies. Anyone interested can have their say. This is democracy at work.
- 6.1.4 Time constraints for the determination of a planning application do not allow for organisations like BSANA to have the depth of consultation that a community should be afforded to contemplate such a significant development. This was also the case with the formation of the development framework, but BSANA has worked hard to engage with its residents within the time frame.
- 6.1.5 A planning application should not contain such significant surprises, it should be reflective of a development framework (if there is one) and local and national planning policies.
- 6.1.6 It is not the role of BSANA to have to justify existing development parameters to the applicant and it is not the role of the applicant to try and determine new development parameters.

6.2 Development Parameters

6.2.1 In paragraph 3.101 of Broad Street Mall Environmental Statement: Volume 1 - Chapter 3 of the Alternatives and Design Evolution document (file BSM_ESVol1_Chapter3_Alternatives and Design Evolution), the following is noted ***"The maximum height of the buildings has increased during the design process of the Proposed Development from the Extant Consent. The maximum height presented in Pre-Application Meeting 1 was 135.250m AOD, however, following feedback from RBC which welcomed further increases in height, the height of the Proposed Development was increased to 142.855m AOD (Figure 3.8). The proposed AOD of the tallest tower is 142.855m, which is approximately 20m below the 163m of the tallest building of Plot C of the Station Hill Cluster"***.

- 6.2.2 The MQADF clearly sets a maximum height of 115.590m AOD (60m above the BSM) as the permitted development parameter for the tallest building on top of the BSM. Heights of 135.250m AOD and 142.855m AOD are 33% (~20m) and 45% (~27m) respectively greater than the development parameter.
- 6.2.3 The role of RBC should be to advise applicants how to adhere to planning policy and guidelines not to encourage them to break them or disregard them altogether.
- 6.2.4 There is no indication who was representing RBC in that pre-application meeting, whether it was a sole planning officer or multiple people and whether any elected officials were present. No matter, democratic due process was clearly not being followed and there wasn't the authority to disregard development parameters on the fly especially for such a sensitive site. The process of defining this parameter for the MQA was a long and difficult process and was democratically determined and very transparent.

- 6.2.5 This application reads like a series of policy documents as it seeks to set out its case to redefine the development parameters set in the MQADF.

6.3 Potential Conflict of Interest

- 6.3.1 The applicant, McClaren (McClaren Living Limited / McLaren (Broad Street Mall) Limited), has been selected as the development partner for RBC for their part of the MQA. RBC also has long term leasehold agreement on the carpark within the BSM which is key to the applicant's development plans.
- 6.3.2 The interests of both RBC and the applicant are highly intertwined.
- 6.3.3 There are significant advantages of this partnership when it comes to trying to create a consistent look and feel across the MQA.
- 6.3.3.1 However, there are also significant areas for concern, for this relationship to work successfully RBC and McLaren have to work very close together and form a close bond. This is a significant disadvantage when it comes to transparency and the potential for conflicts of interest.
- 6.3.4 Where planning applications deviate so far from the development framework, as is the case with this application then additional protection should be put in place to address any concerns that could be raised regarding potential conflicts and due process.
- 6.3.5 There is additional pressure on RBC to look favourably on this application as the BSM will be significantly impeded in terms of site access if RBC development starts ahead of the BSM development or it causes delays to RBC own development.
- 6.3.6 BSANA is very concerned that any attempt to redefine the development parameters would be applicable to the site as a whole, set a new precedent and provide sufficient justification for RBC and S2 Estates to increase the height and scale of their own applications accordingly, and potentially impact other existing or future planning applications. To safeguard against any potential conflicts of interests BSANA would expect applications to fall within the development parameters that have been transparently and democratically set and adhered to over many years, and systematically developed over time.

6.4 Democratic Input

- 6.4.1 At the time of producing this document there had only been only one public comment published on the Planning Portal and that was from someone not living in close proximity to the development site. Tthis situation can only be seen as a failure in terms of an important democratic part of the planning application process. Typically within our neighbourhood even relatively minor changes to a property will result in many public comments which is a healthy democratic input.
- 6.4.2 BSANA has found a general lack of awareness of this application. No attention has been drawn to the substantial deviation from the MQADF development parameters. It was not announced in the local newspaper until a local journalist picked it up after BSANA announced it on its Facebook page and at about the same time as the closing of the 3 week comment period.
- 6.4.3 BSANA was informed by RBC that it had three weeks to comment on the application and this was a week before Easter holidays when many residents / local politicians are away for at least a week.
- 6.4.4 This application alone has over 200 documents which contain over 2000 pages. To review this application requires cross referencing it with the extant consented application and multiple policy documents. The sheer volume of documents required to be read and understood make this application both impenetrable and somewhat intimidating.

- 6.4.5 The planning portal software that RBC uses offers a very poor user experience when it comes to navigating large volumes of documents.
- 6.4.6 BSANA's input in the planning process principally takes place at the development framework level and policy level, where there aren't such restrictive time constraints to contend with. It takes time for BSANA to engage with its residents as our email list only covers a small subsection of residents and we have to leaflet drop to engage with everyone.
- 6.4.7 The MQADF is a democratically produced document, it was subject to the views of many interested parties, a great deal of attention was given to the balance of housing needs against the protection of the setting for Reading's historic heart. BSANA put a great deal of effort into providing the opinion of our community to help shape the development framework. The MQADF was approved by democratically elected councillors.
- 6.4.8 BSANA's comments for planning applications are thus restricted to observations to adherence to the planning policy and development framework.

7 Consultation in Support of this Document

- 7.1 With time restrictions of planning application determination, BSANA engaged with residents as best they could.
- 7.2 BSANA has ensured that this is a document of the neighbourhood by following the methods.
- 7.3 BSANA was fully engaged with residents during the period of the creation of the MQADF and with our comments on the extant consented planning application, thus BSANA's response to this application builds upon an existing dialogue with its neighbourhood.
- 7.4 BSANA worked with ward councillors to ensure that a separate session was held for local residents by the developer. Approximately 30 residents attended at very short notice and the exchange was respectful.
- 7.5 BSANA also used its community notice board to attract attention to the application and also reached out to residents via Social Media.
- 7.6 BSANA has a mailing list that covers a small number of the total residents in its neighbourhood, BSANA has to leaflet to reach all residents which time did not allow for.
- 7.7 BSANA requested the views of residents on its mailing list with the question sent to its mail group of which 62 recipients opened it and a third of these replied.
- 7.8 The question was "Would you like to at this stage provide comments about planning application 240173 - Broad Street Mall? If so. please detail below:".
- 7.8.1 *"Over development which will add to traffic issues, pollution and mean more strain on local services"*
- 7.8.2 *"Extremely strongly against it. Reading does not need this. It is totally at odds with visual amenity and the visual streetscape."*
- 7.8.3 *"I have concerns about the changing face of Reading due to the proliferation of flat building in the area. I'm particularly dismayed to learn that only a small percentage of residences will be reserved for social housing, when RBC have previously advised otherwise. There is also the concern about how this building will cast shadow across the Baker Street / Oxford Road area, as well as how this development will affect infrastructure such as water supply and sewerage networks."*
- 7.8.4 *"I'm beyond annoyed at the amount of flats they want to build in Reading without supporting hospitals and doctors and schools and traffic networks. Ridiculous lack of foresight from town planners who can't see beyond each application."*
- 7.8.5 *"I'm in favour of the development, I think it will help regenerate the area and hopefully have a positive impact to the area. I'd also like to push the council to follow up on plans to build over the IDR between Howard Street and the Hexagon, making a public space and safer crossing from Baker Street."*
- 7.8.6 *"In one word "appalling". In a few more, unsympathetic architecture, completely inappropriate. From the other side it will tower over St Mary's Minster."*
- 7.8.7 *"I am deeply concerned about the impact on the two neighbouring Conservation Areas. And also about the quality of life for residents of the development with no access to open space or family facilities. While recognising the pressure to create more homes, these must be of sufficient quality and not create the ghettos of the future."*
- 7.8.8 *"Ugly and it will ruin the landscape of the town centre"*
- 7.8.9 *"This proposal is shameful as it would change the whole area negatively in an area with many historical buildings. More towerblocks would block out natural light and be detrimental to the area. What about the infrastructure? It would create chaos with so many dwellings. Reading is being turned into a mini New York and will end up being a big wind tunnel and not fit for humans. "*

- 7.8.10 *"I think this is horrendous... it's one thing having these tall monstrosities on the outskirts of town, but right in the center like this is taking things too far!!!"*
- 7.8.11 *"Where will school places for the potential number of children in these flats come from? The buildings are too tall, making them a fire risk but also look awful in this area. Too many tower blocks being built in Reading now"*
- 7.8.12 *"It looks monstrous and will considerably and deleteriously affect the outlook of our house in Franklin St. A structure of this height and scale will totally change the outlook for many residents and businesses in the town centre; it will dominate the town and block light."*
- 7.8.13 *"I am strongly opposed to these plans which exceed the pre-agreed planning criteria so significantly. It will be visually obtrusive and will add an unreasonable number of extra residents to an area already lacking sufficient infrastructure - in particular schools, play areas/green space and parking. It will also add to the overall congestion of the area. Noting the significant amount of high volume accommodation which has been built in the town centre in recent years. The lack of appropriate levels of affordable housing proposed, and indeed the whole proposal, makes a mockery of the minster quarter development plans. I strongly believe this development, if it goes ahead as currently submitted, will have a significant negative impact on the environment and wellbeing of new and existing residents and will be to the detriment of the town."*
- 7.8.14 *"don't mind the height so much. Less blocky than the last design. Should be more affordable flats for local people"*
- 7.8.15 *"This seems exceptionally high and I would question the quality of living space and access to green spaces for residents. All seems rather depressing for residents of the space and residents of the surrounding area."*
- 7.8.16 *"As a resident I am proposing that the planning application is rejected. The proposed building is not at all fitting in with the local area and will pollute the skyline. Thank you."*
- 7.8.17 *"The height of the buildings completely dwarfs the housing at the east end of Baker St. It will block out a lot of light (and the sunrise). I think it will be detrimental to our neighbourhood."*
- 7.8.18 *"I have no objection in general to clusters of tall buildings in appropriate areas. I think that the height of the nearest block is completely overbearing at the Hexagon corner. The overall design of the blocks is uninspiring considering that it is between our conservation area and the Minster area. I welcome the improvements to Queens Walk and Düsseldorf Way."*
- 7.8.19 *"Will negatively impact the historical nature of the immediate area as well overshadowing this conservation area, thereby destroying the heritage which Reading has worked hard to promote and protect. Very disappointing that the planning application appears to ignore the permitted height as outlined in the area's developmental framework. Further more, studies from areas with similar density of very high rise dwellings show that they have a detrimental impact on social, emotional and mental health well-being, with residents reporting feeling isolated and 'trapped' in such high rise blocks (particularly children and their parents, the vulnerable and the elderly) with no easy recourse to outside green space and no sense of neighborhood or community. Indeed in other parts of the UK high rise blocks such as these have been demolished, with low rise blocks/houses erected in their place, the openness and space allowing residents to establish a pride in their community and a greater feeling of neighborliness. With the reported significant rise in mental health issues, everything should be done to lower the risk of people being confined to restricted spaces and to ensure easy access to nature for all. It appears that the development as currently proposed has no regard for the people who will live in these tower blocks, nor for the cultural heritage of the area."*
- 7.8.20 *"Don't feel the height being over the plan suggestion is an issue as it is in the town centre. Think it looks good when old and new are against each other and looks more spectacular"*

when buildings are tall as opposed to all low rise blocks. Feels reflective of the progress Reading is making. Do feel strongly that affordable units should be kept in line with plan suggestion. There aren't rent controls (should be arguably..) and this is one way of controlling out of control housing costs therefore I hope this can be enforced more than seems to be currently. Design of the building is just ok- nothing unique to Reading which is disappointing but nothing that could warrant real objection."

7.9 BSANA made two Facebook posts ...



BSANA - the Baker Street Area Neighbourhood Association

9 April at 14:11 · 🌐

A perspective of the proposed development from the end of Baker Street. Notably, the closest tower exceeds the permitted height by 7 storeys and approximately 27 meters (almost 90 feet), as outlined in the area's development framework.



👍❤️👍 7

6 comments

👍 Like

💬 Comment

Most relevant ▼



Linda [redacted]
That's monstrous... What an eyesore! 🤔👎

2 w



Chris [redacted]
Bloody ell... That's big. 🙄

2 w



Mark [redacted]
So I'm guessing once that's been permitted all the police station area will be the same ... goodbye sunlight 🙄

2 w



Chris [redacted]
How about providing a new and safe walking route over the IDR and around the roundabout. Seem to remember there were aspirations.

2 w



Claire [redacted]
Where can we comment on the consultation?

2 w



Author

BSANA - the Baker Street Area Neighbourhood Association
Claire Skelly The Baker Street Area Neighbourhood Association (BSANA) would like your views on the new planning application for the Broad Street Mall to help shape our response to it. This development forms part of the Minster Quarter area. BSANA have been granted an extended deadline of the 19th April.

For further information about this application please visit http://bsana.org/?page_id=1900

Click here to complete the survey: <https://us3.list-manage.com/survey...>



BSANA.ORG
Broad Street Mall Planning Application

2 w



BSANA - the Baker Street Area Neighbourhood Associatio...

BSANA - the Baker Street Area Neighbourhood Association

9 April at 14:07 · 🌐

The Baker Street Area Neighbourhood Association (BSANA) would like your views on the new planning application for the Broad Street Mall to help shape our response to it. This development forms part of the Minster Quarter area. BSANA have been granted an extended deadline of the 19th April.

For further information about this application please visit http://bsana.org/?page_id=1900

Click here to complete the survey: <https://us3.list-manage.com/survey.....> See more

A perspective of the proposed development as seen from the junction of Jesse Terrace and Baker Street.

👍👎🗨️ 5

5 comments 13 shares

Like

Comment

Most relevant ▾

Olly [redacted]

Ghastly. Brown envelopes must be involved if this gets a green light.

2 w

3

Frances [redacted]

Far too high. We need family homes and social housing not high rises/

2 w

Peter [redacted]

What a monstrosity! If I was still local I'd be shouting from the rooftops about this. Good luck!

2 w

1

Top fan

Terry [redacted]

Too high!

2 w

Kim [redacted]

Awful 🤢

1 w

7.10 BSANA sent a draft of these comments to its mailing list to allow residents to have further input if they disagreed with any of its contents.

29

8 Conclusion

8.1 The proposal should be rejected due to following:

- 8.1.1 The development site sits next to the historic heart of Reading, including two conservation areas, but unfortunately the applicant fails to respect the location. It proposes a development that would create a significant detrimental visual impact on the setting of two conservation areas and a significant number of Reading's historic assets, by adding dominant, bland, bulky towers up to 30 storeys in height against a low rise setting.
- 8.1.2 Failing to adhere to and respect the MQADF by substantially deviating from the development parameters, by proposing a development that is 73% greater in scale than what was previously consented (which itself was scaled itself back to meet the requirements of the MQADF).
- 8.1.3 Substantially failing to meet policy requirements for affordable housing. BTR developments in Reading are proven to be targeted towards a relatively affluent demographic and are therefore out of reach for many key workers that Reading's population depends upon e.g. nurses and teachers.
- 8.1.4 Failing to provide sufficient open space and play areas for such a large development.
- 8.1.5 This will be a gated community so what little open space is provided by the proposal is both private and compromised due to it being heavily fragmented and much being shaded throughout the day. The Station Hill development offers an example of a development that tries to open itself up to the benefit of the wider Reading community rather than shutting itself off from the outside world.
- 8.1.6 Failing to provide any mitigation to affected communities for such a dominant skyline development that will add additional strain on local resources.
- 8.1.7 BSANA would expect substantial mitigation in the way of open public spaces and play areas, both of which local communities are significantly deprived of and that would help lead to greater community cohesion. One possible solution would be the decking over of the IDR which could be jointly financed with the other developments within the MQA, this would help to reconnect central and west Reading after being badly severed by the IDR over 50 years ago and would help to contain vehicle pollution. This is not an outlandish proposal and the costs associated with such a proposal
- 8.1.8 Whilst there is very limited on site amenity, given the negative skyline impact of the proposal on the surrounding area there should be more community benefit included with any scheme whether the existing or the proposed.
- 8.1.9 The substantial environmental cost of demolishing the southern edge of the BSM rather than building on top of it as was the case with the extant consented application.
- 8.1.10 BSANA believes that the suggested development on top of the BSM within the MQADF was always a compromise solution even with an envisaged number of dwellings half that now being proposed, even the consented application would create the most incongruous development in Reading, this proposal amplifies that further and the division between central and east Reading. There would be a significant environmental impact of tearing these towers down after a relatively short period because they are deemed an eyesore by future generations and/or not attractive place to live.

8.2 Other considerations:

- 8.2.1 Due to RBC's heavily intertwined relationship with the applicant and so much to be gained by all parties from a back door increase in development parameters, RBC has to be very

sensitive to this. BSANA believes the only way to avoid potential conflicts of interest or undue influence in this relationship is by all parties adhering to the MQADF.

- 8.2.2 The MQADF development parameters were produced following democratic process. BSANA was one of many interested parties who put considerable effort into this process, making sure our conservation area (RSCHORCA) was given due consideration. In the determination of these development parameters all parties followed a transparent and democratic process. BSANA expects this agreement to be honoured by all parties in the same spirit and no attempt to undermine the democratic process should be allowed.
- 8.2.3 Within the proposal the applicant asserts that during the pre-application process RBC indicated that the MQADF development parameters should not be seen as a constraint and that RBC encouraged the applicant to further increase the height and scale of the buildings significantly beyond the parameters. No indication was given as to who was involved, but no one person or group of people can determine or override policy without following due process. This would undermine trust and confidence in the transparent and democratic nature of the planning process.
- 8.2.4 BSANA expects RBC to adhere to high ethical standards in its decision making process and should be open to independent scrutiny from a planning inspector/ombudsman if any concerns are raised.