
Planning Statement

20-30 Greyfriars Road, Reading, RG1 1NS



Executive Summary

Proposed Co-Living Building

- 13-storey building delivering 266 co-living units and associated communal amenity space
- Affordable Housing in the form of 30% on-site discounted market rent co-living units aimed at key workers

Amenity Space

- Internal communal amenity areas comprising shared kitchens, lounges, gym and co-working space comprising 823 sqm (3.09 sqm per resident)
- Shared external amenity areas measuring 423 sqm (1.59 sqm per resident)
- Improved public realm along Greyfriars Road and Garrard Street

Residential Amenity

- No unacceptable sense of enclosure, loss of privacy or loss of outlook
- Vast majority of surrounding windows would meet BRE guidance in terms of VSC and NSL
- Majority of rooms achieve excellent levels of internal daylighting
-

Energy and Sustainability

- 40.6% reduction over baseline carbon emissions
- Carbon off-set payment of circa £95k to be secured
- Overheating assessment shows compliance with standards

Landscaping and BNG

- Hard and soft landscaping scheme to terraces and public realm
- Biodiversity Net Gain of 146%
- New tree planting

Air Quality and Noise

- No adverse impact on air quality of local area
- Compliant with day-time residential internal noise limits

Transport, Servicing & Fire Safety

- Car-free
- 72 cycle spaces
- Refuse collection and servicing undertaken on Greyfriars Road
- 2 Staircases in compliance with Gateway One & Fire Statement included to demonstrate fire safety measures

Potential Heads of Terms

- Air Quality
- Energy (carbon off-set) payment
- Car-free development (restrict parking permits)
- Transport & Highways Improvements
- Landscape management
- Monitoring fees
- Payment of the Council's reasonable legal costs

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1. Introduction

1.1. Proposal Introduction

1.1.1. This document has been prepared by Savills, on behalf of Elder Developments (Greyfriars) Ltd ('the applicant'), in support of a full-planning application to Reading Borough Council ('the Council') in respect of development proposals at 20-30 Greyfriars Road for demolition of the existing building and erection of a thirteen storey building for provide 266 co-living units and communal amenity space.

1.1.2. Elder, is real estate developer that plays an active role in the sustainable regeneration of our urban landscape. Elder believes that through the reimagination of underutilised commercial buildings and sites, they can create thriving new co-living communities and provide the affordable and accessible housing that is highly needed, acting as a catalyst for sustainable regeneration and creating a positive, enduring legacy.

1.1.3. The application proposes the following:

"Demolition of the existing building and the erection of a part-7, part-13 storey building comprising 266 co-living units (Sui Generis) and associated communal amenity facilities, refuse storage, cycle parking and plant equipment."

1.1.4. The key aspects of the proposals are summarised below:

- Demolition of existing building;
- Erection of part seven, part thirteen storey building;
- Provision of 266 co-living units;
- Provision of co-working space and gym facilities at ground floor level;
- Provision of communal internal amenity space at ground and twelfth floors;
- Provision of external amenity space at ground, seventh and twelfth floors;
- Provision of secure cycle storage facilities;
- Waste and servicing facilities;
- Plant equipment, principally at roof level of the building;
- Landscaping enhancements to ground floor and at roof levels.

1.2. Structure of Report

1.2.1. In this Planning Statement we describe the site, set out the planning history, provide planning context and define and asses the application proposals. This Planning Statement takes the following format:

Section 1 – Introduction
Section 2 – Site Description & Context
Section 3 – Pre-Application Engagement
Section 4 – Environmental Impact Assessment
Section 5 – Planning Policy Context
Section 6 – Planning Assessment
Section 7 – Planning Conditions & Obligations
Section 8 – Planning Balance

Section 9 – Summary & Conclusions

1.3. Application Submission Content

1.3.1. The planning application material which accompanies the planning application is set out below:

- Affordable Housing Statement including Viability Appraisal, prepared by DS2;
- Application Form, prepared by Savills;
- Air Quality Statement, prepared by Savills;
- Archaeological Assessment, prepared by RPS;
- Biodiversity Net Gain Assessment, prepared by Greengage;
- BREEAM Pre-Assessment, prepared by Greengage;
- Co-living Need Assessment, prepared by Savills;
- Co-living Operational Management Plan, prepared by Vervlife;
- Community Infrastructure Levy Form, prepared by Savills;
- Daylight & Sunlight Assessment, prepared by Point 2;
- Design and Access Statement, prepared by Darling Associates;
- Desktop Contaminated Land Assessment, prepared by Lustre;
- Drainage Statement, prepared by Form Structures;
- Ecological Survey and Appraisal, prepared by Greengage;
- Energy Statement, prepared by Meinhardt;
- Fire Safety Statement, prepared by Orion Fire;
- Heritage & Townscape Visual Impact Assessment, prepared by Montagu Evans;
- Landscape Strategy, prepared by Henshall Green;
- Noise Impact Assessment, prepared by Sol Acoustics;
- Overheating Statement, prepared by Meinhardt;
- Social Value Statement, prepared by Savills Earth;
- Social Value and Economic Benefits Summary Report, prepared by Savills Economics;
- Statement of Community Involvement, prepared by Opus Works;
- Sustainability Statement, prepared by Meinhardt;
- Transport Assessment, prepared by TTP; and
- Wind & Microclimate Assessment, prepared by RWDI.

1.3.2. The application submission includes the following plans and drawings:

Reference	Name	Size and Scale	Author
GFR-DAA-XX-XX-DR-A-01000-P1	Site Location Plan	1:1250 @ A1	Darling Associates
GFR-DAA-XX-XX-DR-A-01001-P1	Existing Site Plan	1:500 @ A1	Darling Associates
GFR-DAA-ZA-XX-DR-A-01002-P1	Existing Topographical Survey	1:100 @ A1	Daring Associates
GFR-DAA-ZA-B1-DR-A-01100B1-P1	Existing Basement Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-00-DR-A-01100-P1	Existing Ground Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-01-DR-A-01101-P1	Existing First Floor	1:100 @ A1	Darling Associates

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Reference	Name	Size and Scale	Author
GFR-DAA-ZA-02-DR-A-01102-P1	Existing Second Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-03-DR-A-01103-P1	Existing Third Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-04-DR-A-01104-P1	Existing Fourth Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-05-DR-A-01105-P1	Existing Fifth Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-06-DR-A-01106-P1	Existing Sixth Floor	1:100 @ A1	Darling Associates
GFR-DAA-ZA-07-DR-A-01107-P1	Existing Roof Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01301-P1	Existing Cross Section	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01302-P1	Existing Long Section	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01201-P1	Existing South Elevation 1	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01202-P1	Existing South Elevation 2	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01203-P1	Existing East Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01204-P1	Existing North Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A-01205-P1	Existing West Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-00-DR-A- 03000-P1	Proposed Site Plan	1:500 @ A1	Darling Associates
GFR-DAA-ZA-00-DR-A- 03100-P1	Proposed Ground Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-01-DR-A- 03101-P1	Proposed First Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-02-DR-A- 03102-P1	Proposed Second Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-03-DR-A- 03103-P1	Proposed Third Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-04-DR-A- 03104-P1	Proposed Fourth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-05-DR-A- 03105-P1	Proposed Fifth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-06-DR-A- 03106-P1	Proposed Sixth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-07-DR-A- 03107-P1	Proposed Seventh Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-08-DR-A- 03108-P1	Proposed Eighth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-09-DR-A- 03109-P1	Proposed Ninth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-10-DR-A- 03110-P1	Proposed Tenth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-11-DR-A- 03111-P1	Proposed Eleventh Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-12-DR-A- 03112-P1	Proposed Twelfth Floor Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-13-DR-A- 03113-P1	Proposed Roof Plan	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03201-P1	Proposed South Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03202-P1	Proposed East Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03203-P1	Proposed North Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03204-P1	Proposed West Elevation	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03301-P1	Proposed Section A-A	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03302-P1	Proposed Section B-B	1:100 @ A1	Darling Associates
GFR-DAA-ZA-ZZ-DR-A- 03303-P1	Proposed Section C-C	1:100 @ A1	Darling Associates
GFR-DAA-XX-XX-DR-A- 21500-P1	Façade Detail - Brick	1:20 @ A1	Darling Associates
GFR-DAA-XX-XX-DR-A- 21501-P1	Brick Façade	1:50 @ A1	Darling Associates

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Reference	Name	Size and Scale	Author
GFR-DAA-XX-XX-DR-A- 21502-P1	GA Detail Elevations	1:50	Darling Associates
GFR-DAA-XX-XX-DR-A- 21503-P1	Render Façade	1:50	Darling Associates
GFR-DAA-XX-XX-DR-A- 21504-P1	Render Façade	1:50	Darling Associates
GFR-DAA-XX-XX-DR-A- 21505-P1	Facade Axonometric	NTS	Darling Associates
126-HGL-XX-00-DR-L-0001-P01	Illustrative Landscaping Masterplan	1:100 @ A1	Henshall Green
126-HGL-XX-00-DR-L-0002-P02	Ground Floor and First Floor Landscape General Arrangement	1:100 @ A1	Henshall Green
126-HGL-XX-00-DR-L-0003-P02	Level 7 Landscape General Arrangement	1:100 @ A1	Henshall Green
126-HGL-XX-00-DR-L-0004-P02	Level 12 Landscape General Arrangement	1:100 @ A1	Henshall Green
126-HGL-XX-00-DR-L-0005-P02	Illustrative Landscape Sections	1:50 and 1:100 @ A1	Henshall Green

1.3.3. The next section provides the application proposals.

2. Site Description & Context

2.1. Site Description

- 2.1.1. The site currently accommodates a part six part seven storey building understood to have been built in the 1980s. The site is situated on the eastern side of Greyfriars Road on the corner with Garrard Street to the north and opposite Vachel Road. The site comprises of approximately 3,000sqm of office floorspace and is partially vacant, albeit the entire building's lawful use is considered to be offices (Class E(g)(i)). The building accommodation is poor quality and offers little in townscape terms to the local area which is undergoing significant regeneration at Station Hill. The ground floor particularly provides no active frontages and activity at street level.

2.2. Site Context

- 2.2.1. The site is located within central Reading, and is situated approximately a 5-minute walk from Reading Train Station. The town is well connected to central London benefiting from the Elizabeth Line and National Rail services, which provides services to London Paddington in approximately 23 minutes. The train station also provides further National Rail services connect Reading to the rest of the UK. There are a number of bus stops with buses serving the local area.
- 2.2.2. Reading's neighbouring towns include Bracknell, Slough and Basingstoke all circa. 30 minutes away. Reading is also served by access to the M4.
- 2.2.3. The site is currently allocated within the Reading Borough Council Local Plan (2019) under Policy CR11 (Station/ River Opportunity Area) which states that the site provides the opportunity to be redeveloped for mixed-use and the site should capitalise on the accessibility of the location.

2.3. Surrounding Area

- 2.3.1. The surrounding area comprises a mix of commercial and residential uses due to the sites location in Reading town centre. The site is highly accessible to a plethora of amenities. The site is located approximate 10 minute walk to Broad Street, the centre of Reading town.
- 2.3.2. There is a significant level of development surrounding Reading Train Station, primarily known as Station Hill. The area is comprised of a number of tall buildings in a mix of building styles and forms. The heights of buildings in the surrounding area range from 3-4 storeys along Greyfriars Road to the west and 13+ storeys to the east of the site under construction.
- 2.3.3. The Station Hill Masterplan is shown in Figure 1, which identifies the three phases of development that are in the pipeline. Phase 1 was approved at outline in August 2021 (201536) with final reserved matters approved in August 2023 (201537). It comprises of a 12 storey building, plus basement, comprising of 415 Build to Rent residential units, 772 sqm (GEA) of flexible commercial and leisure and the following Sui Generis uses: Drinking Establishment and Hot food.

2.3.4. The application for Phase 2 (192032) comprises the demolition of existing structures and the erection of a 18 storey building containing office use and flexible retail, non-residential institution and assembly and leisure uses. Outline permission (all Matters Reserved) was granted in August 2021 for the final phase of development to demolish the existing building and structures to provide mixed-use redevelopment.



Figure 1: Image showing the Station Hill Masterplan and the proposed phasing

2.4. Planning History

2.4.1. A planning history search has been undertaken on the Council's website, which is summarised below:

Reference Number	Description of Development	Decision Date
200211	Change of use from Class B1(a)(offices) to C3 (dwelling houses) to comprise 43 flats. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (Permitted Development) Order 2015.	Approved 10/06/2020
170229	Change of use from Class B1(a) (offices) to C3 (dwelling houses) to comprise of 43 apartments comprising 23 one bed flats, 19 two bed flats and a single three bed flat. Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Approved 05/04/2017

2.4.2. Other relevant planning history includes:

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Address and Reference Number	Description of Development	Decision Date
162210 52-55 Friar Street and 12 Greyfriars Road (Sainsburys)	Demolition of existing building and structures (Class A1) and erection of 3 new buildings ranging between 6 - 12 (and basement) storeys in height to provide 135 (1xstudio, 54x1, 73x2 & 7x3-bed) residential units (Class C3), a flexible Class A1-A5 use at ground floor level fronting onto Friar St, a flexible Class A1-5, B1(a) or D2 (gym only) use at ground floor level fronting onto Greyfriars Rd, with associated access, parking, servicing, landscaping and engineering works (amended description).	Approved 20/03/2018 Understood to not have been implemented and now lapsed
220933 35-39 Friar Street	Demolition of existing buildings and installation of basement and erection of part 7, part 11 storey mixed use building comprising 103 upper floor residential units (Class C3) and Class E uses at part basement, part ground floor and Class E(g)(i) at part first floor level plus landscaping and other works.	Resolution to grant subject to legal agreement 04/09/2024

2.4.3. The next section provides details of the pre-application discussion that have been undertaken.

3. Pre-application Engagement

3.1. Reading Borough Council Consultation

- 3.1.1 In this section, we set out the comprehensive pre-application consultation that has been undertaken with regard to the development of the site. A Statement of Community Involvement has also been prepared and is set out in the next section of this Planning Statement.

Pre-application Consultation	Date
Pre-application Meeting 1	16 January 2024
Pre-application Meeting 2	13 June 2024
Pre-application Meeting 3	18 July 2024
Design Review Panel – Frame	14 August 2024
Pre-application Meeting 4	17 October 2024

Pre-application Meeting 1 (16 January 2024)

- 3.1.2 An initial pre-application meeting was held with Officers on 16 January 2024 for the conversion and extension of the existing building to provide a mixed-use development comprising of commercial (Class E) and residential co-living units and shared amenity spaces (Sui Generis). The scheme discussed at this pre-application principally related to the retention, conversion and extension of the existing building for co-living use.
- 3.1.3 Written pre-application advice was received on 20 March 2024. The written advice established that the principle of a co-living scheme on the site would be acceptable, subject to a future application demonstrating that the quantum of residential units proposed in the Local Plan could still come forwards on other parts of the allocated site and the loss of office space is robustly addressed. Officers assessed the design approach as not being acceptable and that re-cladding and extending an unattractive building would not be sufficient to provide the high quality design required to integrate with Station Hill.
- 3.1.4 Following the pre-application meeting and written advice, further analysis was undertaken on the existing building's structure in relation to the retention and adaptive reuse of the existing building. In order to accord with building and fire regulations, it was identified that significant interventions would have to be undertaken which presented challenges in achieving a successful design outcome which responded to the first pre-application written advice. Elder reconsidered the approach to the site with the design team, and also partnered with VervLife, a nationwide co-living operator who will manage and operate the scheme on behalf of Elder.

Pre-application Meeting 2 (13 June 2024)

- 3.1.5 The second pre-application was held with Officers on 13 June 2024 and formed part of an agreed PPA with the Council. The second pre-application related to new proposals for the Site comprising the demolition of the existing building and erection of a new-build scheme at part 6- and part 12/13-storeys consisting of 253

Co-living units (Sui Generis) with associated internal and external amenities and a self-contained commercial unit fronting Greyfriars Road (Class E). Verbal pre-application advice was provided rather than written pre-application advice.

- 3.1.6 The second pre-application advice was constructive with Officers setting out that the proposals were a marked improvement to the first pre-application with comments concerning the overall height and massing, layout and location of amenity spaces and affordable housing.

Pre-application Meeting 3 (18 July 2024)

- 3.1.7 The third pre-application was held on 18 July 2024 and presented further design development responding to previous pre-application feedback and technical aspects of the scheme including landscaping, noise, sustainability and transport. Officers welcomed the design changes to respond to previous feedback, including updates to materiality and the internal layouts, as well constructive comments on the approach to landscaping, noise, transport and sustainability.

Design Review Panel (14 August 2024)

- 3.1.8 The proposed development for the site was presented to the Frame Design Review Panel on 14 August 2024, made up of five panel members. The feedback received from the panel members was constructive with comments focused on the following core themes:

- A need to provide sections and context elevations with full application to enable an understanding of the ground / first floor interaction with the street.
- Review floor-to-floor heights to explore opportunities to increase this at G/F and amenity levels.
- Review G/F and 1/F layout including back-of-house areas, location of Class E unit and improving quality of accommodation for 1/F rooms particularly on Greyfriars.
- Review opportunity to add windows to the corridors to improve quality of circulation areas.
- Class E unit should be replaced with more amenity space or rooms.
- Access to cycle store and bin store should be reviewed with sections to demonstrate level access.
- Main entrance should be reviewed to create a better entranceway with double height space to improve quality of this area.
- Explore opportunities to provide terrace at top floor level instead of 11/F, alongside reviewing its layout and quantum. Explore full floor of amenity at top of the building with greater size terrace.
- Prioritise quality of resident experience and areas rather than lower quality public access areas.
- Southern block and elevations could be improved to increase visual interest.
- Wheelchair accessible units to be shown to comply with requirements.
- Incorporate technical aspects such as fire, overheating, and M&E/energy – particularly for window bays.
- Review landscaping opportunities on streetscape and planting species in courtyard.
- Explore colour palettes of brickwork and detailing.

- 3.1.9 The feedback from the Design Review Panel have been considered and addressed as part of the submitted application with key changes including improvements to the main entrance, incorporation of technical aspects, revision of the upper floors to relocate amenity space to the top floor and to occupy the full floor and a review of the colour palette and brickwork detailing.

Pre-application Meeting 4 (17 October 2024)

3.1.10 A final pre-application meeting was held on 17 October 2024 and presented a final scheme taking into account comments raised at Design Review Panel as set out above. The final scheme presented to Reading included the following design changes:

- Amended ground floor entrance arrangement to introduce a chamfered edge to the building, addressing both Greyfriars and Garrard Street.
- Change to brick colour and introduction of different, darker brick colour on lower levels.
- Relocation of shared amenity space from 11th to 12th (top) floor level.
- Provision of further detail in relation to location of cycle and waste stores, and how these will be accessed from Greyfriars Road.

3.1.11 There were also discussions surrounding affordable housing, detailed transport comments including cycle parking ratio and requirement to provide a disabled parking bay, and confirmation of the proposed list of technical reports that would be submitted as part of the full planning application. Discussions were also held surrounding timescales for application submission and determination. Overall, Officers welcomed the design changes and detailed information that had been provided.

Other Key Stakeholders

3.1.12 Further engagement has been undertaken with other key stakeholders including Ward Councillors, Reading Civic Society, Reading Conservation Area Advisory Committee and members of public during a range of meetings, including public consultation events. A Statement of Community Involvement, prepared by Opus Works, provides further detail on this engagement and should be read alongside this Planning Statement.

4. Environmental Impact Assessment

- 4.0.1. It is understood that some of the outline permissions in the wider Station Hill area surrounding the site were considered EIA development, including the adjacent Phase 1 Development fronting Garrard Street, with Environmental Statements submitted for these applications. The site should however be considered in isolation as it does not form an integral part of the Station Hill outline area, it is an individual project, and it is also owned by a separate entity and is not submitted or linked in any way to any other application, consent or development. Furthermore, it is independent of any other development and can function or be delivered without reliance on any other development.
- 4.0.2. The proposal would not meet any of the thresholds contained with Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in being more than 1 hectare of urban development, or comprising more than 150 individual C3 dwellings. In respect of the latter, as highlighted above using both the HDT metric or 2021 Census data, when measures against equivalent C3 dwellings, the proposals fall below the 150 threshold. As such, it is not considered that the proposal would be considered EIA development, and notwithstanding this, it is considered that all environmental impacts of the proposal would be adequately assessed through the various technical reports which will be produced and submitted as part of any future planning application.
- 4.0.3. On this basis of the above, it is considered that the scheme proposals do not constitute EIA development and does not require an environmental impact assessment. During pre-application engagement with the Council, Officers confirmed that the scheme proposals did constitute EIA development and an EIA was not required.

5. Planning Policy Context

5.0. Planning Policy

- 5.0.1. Section 38(6) of the Planning Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. This section of the statement therefore sets out the relevant planning policy and context for the proposed development.
- 5.0.2. The adopted statutory Development Plan relevant to this planning application comprises the Reading Borough Local Plan (adopted November 2019).
- 5.0.3. Material considerations relevant to this planning application include the National Planning Policy Framework (NPPF) (a December 2023), the Council's emerging Local Plan Partial Update (LPPU) and Supplementary Planning Documents (SPDs) including the Affordable Housing SPD (2021) and the Station Hill South Planning and Urban Designs Brief (2007) and the Reading Station Area Framework (2010).

5.1. National Planning Policy Framework (NPPF) (December 2023)

- 5.1.1. The revised NPPF was published in 2023 and is a material consideration in the determination of planning applications. It sets out the overarching guidance against which development proposals will be judged and Local Plan policy should accord.
- 5.1.2. Paragraph 90 states that planning decisions "*should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth*" by recognising that residential development often plays an important role in ensuring the vitality of centres and encourage residential.
- 5.1.3. Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 129 of the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

5.2. Emerging National Planning Policy Framework

- 5.2.1. In regards to addressing the national need for additional housing and making the best use of sustainably located land, reforms are envisaged to the NPPF ('Emerging NPPF'). The reforms seek to promote and support effective use of brownfield land to deliver housing and other uses required to promote and support economic growth.
- 5.2.2. The reforms and changes to the NPPF were published by way of a consultation which took place from July – September 2024, whereby the primary changes proposed were to Section 5 (Delivering a Sufficient Supply of Homes). Of particular note is the recognition that an area should be responsible for meeting its own housing need, with removal of the "exceptional circumstances" which may have otherwise justified an alternative provision. Changes to the standard method for calculating housing need were also consulted

upon, whereby the revised standard method would result in housing need for Reading increasing from 878 homes per year to 1,023 homes per year.

- 5.2.3. The outcome of the consultation on the Emerging NPPF has not yet been published. It is expected that the Emerging NPPF will be published by the end of 2024. Presently therefore, the Emerging NPPF carries limited weight.

5.3. The Development Plan

- 5.3.1. The Development Plan for the site comprises the Reading Borough Local Plan which was adopted in 2019 and covers a plan period up to 2036. The key adopted Local Plan policies relevant to this application are set out below:

- 5.3.2. The site is allocated under Policy CR11 (Station/River Major Opportunity Area) which supports high-density mixed-use development to capitalise on the areas role as one of the most accessible locations in the South-East. The site is specifically allocated in a sub-area under Policy CR11B (Greyfriars Road Corner) for mixed-use development with active retail and leisure uses at ground floor level and a mix of uses on higher floors, with an indicative capacity for 90-140 dwellings. The plan states that development in this area should contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east.

- 5.3.3. The following are other relevant Local Plan Policies that will be further addressed in the Planning Assessment Section of this planning statement.

- Policy CC1 (Presumption in Favour of Sustainable Development)
- Policy CC2 (Sustainable Design and Construction)
- Policy CC6 (Accessibility and the Intensity of Development)
- Policy CC7 (Design and the Public Realm)
- Policy CR2 (Design in Central Reading)
- Policy EM3 (Loss of Employment Land)
- Policy EN1 (Protection and Enhancement of the Historic Environment)
- Policy EN2 (Areas of Archaeological Significance)
- Policy EN15 (Air Quality)
- Policy EN16 (Pollution and Water Resources)
- Policy H1 (Provision of Housing)
- Policy H2 (Housing Density and Mix)
- Policy H3 (Affordable Housing)
- Policy H5 (Standards for New Housing)
- Policy TR4 (Cycle Routes and Facilities)
- Policy TR5 (Cark and Cycle Parking and Electric Vehicle Charging)
- Policy CR2 (Design in Central Reading)
- Policy CR6 (Living in Central Reading)
- Policy CR10 (Tall Buildings)

5.4. Supplementary Planning Documents

Affordable Housing SPD (2021)

- 5.4.1. The Affordable Housing SPD (2021) seeks to support policies in the Local Plan (2019) relating to affordable housing. It provides additional guidance in regards to on-site affordable housing, off-site provision and viability. This document is reviewed in relation to the proposed development in the Affordable Housing section of the Planning Assessment chapter.

The Station Hill Planning and Urban Design Brief (Adopted 2007)

- 5.4.2. The Station Hill Planning and Urban Design Brief forms development principles for the area bounded by Reading Station, Greyfriars Road and Friar Street. The document states that the area is a gateway between the station and the rest of the city centre and provides the perfect opportunity for active frontages and tall buildings.

The Reading Station Area Framework (adopted 2010)

- 5.4.3. This framework sets out principles and guidelines for how development around the station should take place. It states that the site is a significant opportunity for redevelopment due to the site's accessibility to wider Reading town.

5.5. Emerging Development Plan

- 5.5.1. The Council is currently preparing a Local Plan Partial Update (LPPU) to update and eventually replaces the policies in the current adopted Local Plan (2019). The update is due to be consulted upon at Regulation 19 Stage from 6 November until 18 December 2024. The latest consultation version of the Local Plan includes a draft new policy for co-living (Policy H15) whilst the current Local Plan does not have a specific policy. This constitutes the last stage of public engagement before submitting a draft plan to the Planning Inspectorate.
- 5.5.2. Due to the pre-submission stage of the Local Plan, at present, the draft policies holds a limited weight as there are only an indication of the potential policies to be adopted and is subject to scrutiny and examination. There are also objections to different policies which further limit and reduce the weight that can be given to policies. However, we note that the new policy for co-living does indicate that the Council are aware of the growing demand for co-living, and that it is inferred that co-living can contribute towards housing supply in Reading.
- 5.5.3. All of the relevant policies are thoroughly assessed within the Planning Assessment section of this report.

6. Planning Assessment

- 6.0.1. The scheme proposals have been designed, progressed, and developed with the utmost care and attention to detail in respect of the surrounding area's context. This Statement identifies and evaluates the key considerations for this full planning submission.

6.1. Principle of Development

- 6.1.1. The site is allocated within the Reading Local Plan within a wider allocation known as the Station/River Major Opportunity Area (Policy CR11) which supports high-density mixed-use development to capitalise on the areas role as one of the most accessible locations in the South-East. The Opportunity Area is split up into sub-areas with the site located in 'CR11B Greyfriars Road Corner'. CR11B is allocated for mixed-use development with active retail and leisure uses at ground floor level and a mix of uses on higher floors, with an indicative capacity for 90-140 dwellings.

Demolition

- 6.1.2. As existing, the site comprises circa. 3,000 sqm of office and ancillary floorspace over 7 storeys. The site is mostly vacant with all remaining leases due to expire by December 2024.
- 6.1.3. The Reading Borough Local Plan Pre-Submission Draft Partial Update (November 2024) sets out under draft Policy CC2 (Sustainable Design and Construction (Strategic Policy)) that the demolition of an existing building should be accompanied by a full justification for demolition and demonstrate how 95% of all construction waste will be diverted away from landfill. Demolition will only be acceptable where the building is in such a poor state that it is not practical or viable to refurbish or re-use, would result in a similar amount or a greater amount of embodied carbon generation or would result in a building with poor thermal efficiency resulting in a greater lifetime carbon emissions than would arise from a re-build.
- 6.1.4. As set out in the pre-application section of this statement, an initial pre-application meeting was held with Officers on 16 January 2024 for the conversion and extension of the existing building to provide a mixed-use development comprising of commercial (Class E) and residential co-living units and shared amenity spaces (Sui Generis). Written pre-application advice set out that Officer assessed the design approach as not being acceptable and that simply re-cladding an unattractive building would not be sufficient to provide the high quality design outcome for the local area.
- 6.1.5. In response to this pre-application feedback, further analysis was undertaken on the existing building's structure in relation to the retention and adaptive reuse of the existing building. In order to accord with building and fire regulations (particularly meeting the definition of a high risk building) it was identified that significant interventions would have to be undertaken which presented challenges in achieving a successful design outcome which responded to the first pre-application written advice. Therefore, subsequent pre-applications focused on proposals for the Site comprising the demolition of the existing building and erection of a new-build scheme with Officers setting out that the proposals were a marked improvement to the first proposals presented to the Council and that the principle of demolishing the building was accepted on the grounds of challenges with meeting building and fire regulations alongside delivering a higher-quality design solution for this site.

- 6.1.6. It is considered that it is not practical or viable to refurbish the existing building, as tested through the thorough pre-application process which the proposed scheme. In addition, it is considered the proposed building will deliver a higher performing, more sustainable building in the long-term in respect of energy efficiency and thermal performance. Furthermore, recycling of building materials and operational carbon and Co2 has been considered as part of the energy strategy and BREEAM credits.
- 6.1.7. While Policy CC2 remains in draft and is not an adopted planning policy, it is acknowledged that the emerging local plan is advancing to Regulation 19 consultation and therefore holds limited weight. It is considered that due to the reasons set out above that the proposed development is compliant with emerging policy direction of draft Policy CC2.

Loss of Employment

- 6.1.8. As set out in the above site allocation, the site is allocated for a mixed-use development, with the principal aims of the site allocation being for residential dwellings. As such it should be considered that an alternative residential-akin use being the principle use of the site should be acceptable in this instance.
- 6.1.9. Local Plan Policy EM3 sets out a number of criteria against which the loss of employment land is assessed, namely:
- *Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?*
 - *Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?*
 - *Is there a surplus of a similar size and type of accommodation in Reading?*
 - *Would continued employment use of the site detrimentally affect the amenity and character of a residential area?*
 - *Is the need for alternative uses stronger than the need for the retention of employment land?*
- 6.1.10. When considering the immediate surrounding area, including the permissions granted within the Station Hill Masterplan which have consented a significant quantum of office floorspace (approx. 80,000sqm), it is clear that there is a significant provision of office floorspace of better quality and size existing and being developed to meet a range of business's needs. It should also be considered that the quality of the existing office space at the site is poor, and is of a far lower standard compared to the office/commercial floorspace which is being delivered as part of the Station Hill Masterplan. Against a backdrop of office occupiers increasingly demanding high-quality, sustainable Grade A office space, the existing office space would not be in demand by occupiers and would likely require significant investment and renovation to bring up to modern Grade A standards. As set out within the submitted Co-Living Needs Assessment and in the section below, there is a clear need and demand for single-person housing that is an alternative to owning a home or renting in the private rented sector. In combination with the wording contained within allocation CR11B which encourages a mix of uses on the site and principally residential uses, it is considered that it can be demonstrated that there is a need for a residential use on the site which is stronger than the need for the retention of employment land. Overall, it should be considered that the loss of employment land can be reasonably justified through Policy EM3.
- 6.1.11. Notwithstanding the above, the site does not lie within an area which is subject to an Article 4 direction restricting the use of Class MA permitted development rights for the change of use of the site from office

use to C3 residential (subject to compliance with conditions). This is particularly pertinent as changes to Class MA regulations made in March 2024 removed limits on the maximum quantum of floorspace which can be converted from office to residential use, as well as the requirement for the floorspace to have been vacant for at least 3 months prior to the date of the application. As such, it is considered that the entirety of the site could be converted to residential use under Class MA, which should be considered as a relevant fallback position in relation to the loss of the office use.

- 6.1.12. The scheme also includes 100 sqm of co-working space fronting Greyfriars Road, which will provide an office-type use within the building that activates the frontage along this elevation. As set out within the Social Value Statement, the applicant will explore opportunities to allow charities and SME-type businesses to use meeting spaces and co-working spaces within this space free of charge on a periodic basis.
- 6.1.13. Overall, considering the above and in combination with the clear need for housing, specifically single person households, in Reading, it is considered that the change of use of the site from office to co-living use should be considered acceptable, in line with Local Plan Policy EM3.

Co-Living Use and Need

- 6.1.14. Reading's adopted Local Plan does not contain any specific policies on co-living. However, Local Plan Policy H1 identifies at least 15,847 homes should be provided in the Reading Borough for the period 2013-2036 and that the majority of these should be provided on previously developed land.
- 6.1.15. As defined in the Government's Housing Delivery Test (HDT) Measurement Rule Book (2018), bedrooms in communal accommodation count towards a local authority's overall net home delivery target. The contribution is calculated by dividing the number of communal bedrooms by the average number of adults in households in England. The Rule Book used 2011 Census Data which supported a value of 1.8 for this metric. Effectively, for every 1.8 co-living units, this would represent 1 traditional C3 residential unit.
- 6.1.16. Alongside the HDT guidance, we can also consider the local Reading population because the HDT Rule Book (2018) metric excludes children, and if a traditional Use Class C3 residential scheme were to be pursued then it is likely some children could potentially reside in the proposed building. From the most recent Census dataset (2021), the average household size in Reading is 2.57 people.
- 6.1.17. Applying both metrics, the scheme contributes the equivalent of the following number of traditional C3 residential units: 147 (metric 1.8:1) or 103 (metric 2.57:1). Taking either calculation, the proposals would make a valuable contribution to Reading's target for housing delivery. In particular, the Berkshire Strategic Housing Market Assessment (February 2016, Tables 107 and 108) identifies a need for circa. 2,600 1-bedroom units to be delivered in Reading between 2013 to 2036. The proposed scheme would make a sizeable contribution towards this target in a highly sustainable location. Additionally, the delivery of 266 units would serve to freeing up larger homes that are currently being used as HMOs for use as family dwellings. Albeit there is a trend that private landlords are selling and this type of housing supply is also reducing, increasing the need for purpose built rental housing, as evidenced in the submitted Need Assessment.
- 6.1.18. Site Allocation CR11B also sets out an indicative capacity for 90-140 dwellings on the site, which includes the adjacent Sainsburys site at 52-55 Friar Street. In March 2018, planning permission was granted for the redevelopment of 52-55 Friar Street for a mixed-use development comprising 135 dwellings under

reference number 162210. An image from this planning consent is shown in Figure 4 below. This consent was not implemented and has since lapsed, however this provides an indication that just 52-55 Friar Street alone would be able to deliver the majority of the indicative capacity of the site allocation. In combination with the 266 proposed co-living units as part of the current proposals (equating to 103-147 C3 residential units), this would provide a total of the equivalent of up to 282 residential units within the allocation, far exceeding the indicative capacity as set out within the adopted allocation. It should also be considered that any new planning application that is brought forward at the adjacent site would likely seek to increase the quantum of development above the 135 units as previously consented. As such, it can be considered that any residential uses to be delivered as part of the current scheme would fully satisfy and exceed the indicative quantum of development as set out within adopted Site Allocation CR11B.



Figure 2: CGI showing consented development at adjacent site 52-55 Friar Street

- 6.1.19. It is noted that within the emerging Local Plan, the indicative capacity for residential dwellings within the site allocation has increased from 90-140 dwellings to 160-230 dwellings. As set out above, the maximum capacity of the emerging allocation can also be exceeded based on the current proposals and the lapsed consent at the adjacent site.
- 6.1.20. Whilst there is no adopted Local Plan policy regarding co-living, the Council have been preparing a partial update to the Local Plan, which was consulted upon at Regulation 18 Stage in January 2024, and is due to be consulted upon at Regulation 19 stage from 6th November to 18th December 2024. The Regulation 19 consultation version of the plan contains a policy on co-living, namely policy H15.
- 6.1.21. Whilst it is considered that this policy and the draft Local Plan only carries limited weight, it is considered relevant to assess the proposals against this policy.

6.1.22. Emerging policy H15 states that development for purpose-built shared living accommodation should meet all the following criteria:

It is located on a site that has not been identified for general residential (as plan allocations or extant permissions), unless the purpose-built shared living accommodation element would be in addition to the planned residential;	Adopted and emerging site allocations CR11b set out an allocation for mixed-use development, rather than purely for general residential. As set out above, the adjacent site at 52-55 Friar Street previously had consent for 135 residential units, which would almost entirely satisfy the indicative capacity for dwellings within the allocation. As such, it can be considered that the proposed co-living units would be in addition to the traditional C3 dwellings that could potentially be delivered on the adjacent site within the allocation, would not restrict or diminish the possibility of the full residential capacity of the allocation to be delivered in the future.
It is located within the town centre or a 15-minute walk of the town centre, unless a clear justification for an alternative location is provided;	The site is located within Reading's Town Centre.
It provides units for rent with minimum tenancy lengths of no less than three months;	The minimum tenancy period of the units will be no less than three months.
High quality, and well-placed on-site communal facilities and services are provided that are sufficient to meet the requirements of, and available to and easily accessible by, all residents of the proposal. At least 4 sq m of internal communal space will be provided per resident, decreasing to 3 sq m per resident where there would be more than 100 residents, which includes common work areas but excludes circulation space such as corridors and stairways. On-site communal facilities will offer at least: • Communal kitchen and dining facilities • Laundry and drying facilities • A concierge • Cleaning, maintenance and security services	High-quality and well-placed communal facilities have been provided throughout the building, including co-working space, concierge, gym, communal kitchen and lounges. Cleaning, maintenance and security services are also provided, as set out in the Operational Management Plan by VervLife. The provision equates to 3.09 sqm per resident.
The private units have an internal size of at least 18sqm, include a bathroom with shower, and are not capable of being used as self-contained dwellings;	All units will range between 18-32sqm. Residents will have to rely on communal amenities such as laundry rooms for washing clothes and the communal kitchens for the use of ovens and freezers, as such the units will not be capable of being used as self-contained dwellings.
It is under a single management regime;	The building will be under a single management regime.
The proposal is accompanied by a management plan, secured by Section 106 agreement, which demonstrates how the development, including the communal	A management plan produced by the operators, VervLife, has been submitted as part of this application.

facilities, will be managed and maintained over its lifetime;	
The proposal is accompanied by a security strategy, provided at planning application stage and secured by condition or Section 106 agreement, setting out how crime and anti-social behaviour will be mitigated through design and management measures; and	The submitted management plan contains relevant details on how crime and anti-social behaviour will be managed and mitigated. Given the limited weight that this policy carries, it is not considered necessary at this point to submit a supplementary security strategy.
A contribution is made to provision of affordable housing at an equivalent level to policy H3. This will form an off-site financial contribution, unless on-site self-contained affordable dwellings can be provided that do not rely on, and operate independently from, the internal communal facilities.	This point is noted, however given the limited weight of the emerging policy, and the discussions had to date with Officers, the affordable housing contribution is proposed to be in the form of on-site discounted market rent units, as discussed in further detail in the affordable housing section below.

- 6.1.23. Although the policy only carries limited weight, it is considered that the proposals would meet the criteria as set out within emerging policy H15.
- 6.1.24. The application is supported by a Co-Living Needs Assessment which has been produced by Savills Research, which assesses the need and potential demand for co-living within Reading.
- 6.1.25. The assessment finds that the housing market in Reading is becoming increasingly unaffordable, where the median house is now 9.5x the median salary. As such, many first time buyers are increasingly struggling to get on the housing ladder. On the other hand, the outlook for Reading's economy is positive, where Reading's working-age population is projected to grow by over 5,000 people in the next decade, with the fastest growth being in the Professional, Scientific and Tech sectors. Therefore, affordable homes are needed at a range of price points to facilitate growth in Reading's economy.
- 6.1.26. The assessment also finds that there has been a 32% reduction in the number of properties listed to rent in Reading compared to in 2018-19, creating a supply and demand imbalance. Reduced supply has resulted in large increases to rental values with average rents in Reading increasing by 36% between March 2020 and May 2024. In particular, only 5% of rental listings in Reading are studios, meaning few options for single-person households looking for affordable renting housing. It is estimated that renters in the Local Area would need incomes of around £40,200 and £53,500 to afford a median studio or 1-bedroom flat respectively, if spending 35% of income on rent and bills. As such, only those with high incomes can afford to live on their own in the Local Area.
- 6.1.27. In terms of target demographic, the assessment identifies that there would be around 15,700 people in Reading that can be defined as being within the co-living target market, which is the third largest target market in the southeast behind only London and Brighton & Hove.
- 6.1.28. Based on the average estimated rent of the proposed co-living units of £1,430 per month, this would represent a circa. 13% discount compared to the 'all-in' cost of the cost of renting a studio in the local area, including utility bills such as Council Tax, electricity, water and broadband. It can therefore be seen that the proposed co-living units would deliver much-needed, high-quality and affordable rental accommodation in a highly sustainable location in Reading's town centre.

Co-Living Accommodation

- 6.1.29. 266 co-living units are proposed, with all units measuring between 20-29 sqm. 23 of the units have been designed to be wheelchair accessible. The room sizes exceed the minimum requirement of 18sqm as set out within emerging policy H15. All rooms will contain an ensuite bathroom, kitchenette and dining, lounge and working spaces.
- 6.1.30. As set out within the Daylight and Sunlight Assessment produced by Point 2, 79% of the rooms will achieve or be close to complying with the target 150 lux for illuminance in terms of daylight. The majority of rooms will also meet BRE guidance in terms of access to sunlight. It is considered that this is a good level of compliance for daylight and sunlight for developments in a high-density urban areas, and given the nature of the proposals in being single-aspect co-living rooms. It should also be recognised that not all spaces within each co-living unit will be used equally where the kitchenettes and bathrooms will be set to the rear of the units. In the majority of rooms, the main habitable part of the units, which includes the living and sleeping areas, will be adjacent to windows and be well-lit. As elaborated upon below, residents will also have access to three high-quality external amenity areas. Given the complexities of developing a multi-unit scheme within a dense urban area, it is considered that the scheme generally provides a high level of internal lighting and quality of accommodation for future residents.
- 6.1.31. The development will also offer a range of communal internal and external amenity spaces, located at ground and top (12th) floor level within the building. At ground floor level, this includes a co-working space, gym and communal lounge, which open onto a communal courtyard which will include a range of seating options for lounging and working. On the top floor, there is a large communal 'Masterchef'-style kitchen, dining and amenity area, as well as a private event room that is bookable by residents and a media room. These spaces open onto a large south and east-facing terrace with seating. There is an additional south-facing terrace at 7th floor level which offers seating areas and communal gardening areas. The Design and Access Statement and Landscaping Masterplan provides further detail on how these spaces are laid out and how they can be utilised.
- 6.1.32. Overall, 823 sqm of internal amenity area is proposed, equating to 3.09 sqm per resident. This exceeds the requirement of 3sqm per resident as set out in emerging policy H15. The three external amenity areas total 423 sqm, equating to 1.6 sqm per resident.
- 6.1.33. As set out within the Daylight and Sunlight Assessment, the two terraces at 7th and 12th floor level will comfortably exceed BRE criteria in terms of sunlight availability. Owing to the layout and footprint of the building, it is difficult for the courtyard to meet BRE guidance in terms of sunlight. However, the assessment still finds that the three-quarters of the courtyard would received between 2-4 hours on June 21st, during the time of year which the courtyard would be used the most.
- 6.1.34. It is envisaged that the three outdoor amenity spaces will be used for different purposes, and residents will have a choice between which of the three spaces to use. As such, it is considered that the external amenity spaces will be high-quality and allow for residents to use them for a variety of different uses.

Affordable Housing

- 6.1.35. Local Plan Policy H3 states that on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing. It is however understood that this policy applies only to traditional C3 residential dwellings.
- 6.1.36. Section 5.21 of the Affordable Housing SPD (2021) states that co-living is a new form of accommodation which may gain traction in Reading. It states that co-living does not lend itself to on-site affordable housing provision, which would involve transfer to a registered provider, and therefore in most cases, regardless of size, an off-site financial contribution is more likely to be appropriate than on-site provision. The off-site contribution should be calculated by converting the bedspaces to dwelling equivalents (usually on the basis of four bedspaces equating to one dwelling, unless there is an alternative methodology which is clearly more appropriate) and applying the relevant percentage contribution as set out in policy H3 on the basis of GDV. It should be noted at this point that this is guidance, rather than adopted policy.
- 6.1.37. It is also noted that criteria 8 of emerging policy H15 sets out that co-living proposals will only be acceptable where a contribution is made to provision of affordable housing at an equivalent level to policy H3 in the form of an off-site financial contribution, unless on-site self-contained affordable dwellings can be provided that do not rely on, and operate independently from, the internal communal facilities. Similarly, given the early stages of this emerging policy, the fact it has not been subject to examination, and has unresolved objections, it is considered to carry very limited weight.
- 6.1.38. If using the methodology as set out within the Affordable Housing SPD, then the scheme would have to provide a financial contribution equivalent to 20 affordable housing units (266 co-living units equating to 66.5 traditional C3 units, then 30% of 66.5 units = 20 units).
- 6.1.39. However, in the case of build-to-rent developments, the Affordable Housing SPD allows for the affordable housing provision in these developments to be provided in the form of 30% of units being on-site 'affordable private rent', which is defined as being at least 20% below market rent.
- 6.1.40. The NPPF defines Build to Rent as 'purpose built housing that is typically 100% rented out', and that it will 'typically be professionally managed stock in single ownership and management control'. It is considered that co-living can also be defined in the same manner in being 100% rented out, and being retained in single ownership and management control. As such, operationally, there is no reason why the affordable housing provision in a co-living development cannot be delivered as on-site discounted market rent units. In our view, and as supported by other consents, discounted market rent co-living units meet the definition of affordable housing, as defined by the NPPF.
- 6.1.41. As noted above, there are a number of consented and operational co-living schemes around the UK where LPAs have agreed that on-site discounted market rent units can be provided instead of a financial contribution towards off-site affordable housing. These include schemes in Bristol, Woking, Guildford and Exeter.
- 6.1.42. Given this, from the first pre-application, the applicant has suggested that their preference would be to offer on-site discounted rent units instead of an off-site financial contribution. As such, the current proposals seek to deliver 80 on-site discounted rent units, equating to a 30% provision in line with the requirements of Local Plan Policy H3.

- 6.1.43. The key benefits in this instance would be the ability to offer affordable housing units in a town centre location for single-person households, which is a form of affordable housing that is not commonly offered, particular in such a central location close to Reading Station. In particular, the discounted co-living units would be able to support accommodation for key workers such as those working or training at local NHS Trusts, including Royal Berkshire Hospital (under 10 minutes' cycle from the site), interns working in the town centre as well as post-graduate students or those visiting the University of Reading and Reading College.
- 6.1.44. As set out within the Co-Living Needs Assessment, Reading has 27,000 workers employed as key workers, equating to 30% of the total workforce. The assessment finds that key workers have seen their pay fall relative to other workers, and this is particularly in relation to increases in rental values. The increase in rental prices means that homes in Reading are hugely unaffordable for key workers, and that living alone in the private rented sector in Reading is practically impossible for those on lower incomes.
- 6.1.45. Assuming key workers would spend 35% of their gross income on rent and bills, the assessment finds that an unqualified teacher or pharmacy technician would not be able to afford any studios or 1 beds on the market. A qualified teacher would only be able to afford 5% of studios and 1% of 1-bedroom flats.
- 6.1.46. To this end, the Applicants have engaged in a number of meetings prior to submission with relevant stakeholders, including with Ward Councillors, the Council Officers, as well as the local NHS Trusts and Foundations. The meetings with Ward Councillors and with the NHS have been positive, with all showing clear support for the on-site provision, noting the lack of affordable housing being provided in highly accessible, town centre locations.
- 6.1.47. In particular, in discussions it has been clear that discounted market rent on-site would help the NHS with staff retention and ensuring a stable workforce to be able to provide essential and important public care and services. Furthermore, the NHS have been supportive of the proposals as they have undertaken their own research and identified the need for purpose-built well-managed accommodation to not only help with staff retention, but also help the health and well-being of key-workers whose only option sometimes may be poor quality and unsuitable shared HMO-type accommodation. Equally, given the flexible tenancy lengths, the on-site provision will promote and support trainee doctors and nurses, or those doing placement rotations at Royal Berkshire Hospital or NHS facilities in the area.
- 6.1.48. As set out within the Affordable Housing Statement produced by DS2, the discounted units will be discounted over a range of discounts from 60-80% of market rent. The analysis finds that these units would be affordable to all the key workers assessed within the report. It is clear that the delivery of on-site affordable units would deliver tangible and demonstrable benefits in providing accommodation for key workers in a town centre location.
- 6.1.49. On the other hand, the Council's Policy and Housing Officers have acknowledged the benefits that the delivery of on-site affordable housing could bring, however they have indicated that the guidance contained within the Affordable Housing SPD and emerging policy explicitly states that co-living schemes can only contribute towards affordable housing through an off-site financial contribution.
- 6.1.50. It is acknowledged that the policy position is that co-living schemes in Reading can only contribute towards affordable housing through an off-site financial contribution. However, whilst they do form a material consideration, this guidance is only contained within the Affordable Housing SPD, which is guidance and

not adopted policy, and as such carries less weight. Similarly, given the early stage of the emerging policy, it can only carry very limited weight.

- 6.1.51. The Affordable Housing Statement also provides a theoretical calculation of the financial contribution that the scheme would be able to viably offer to the Council, which shows that it is far lower in value compared to the policy-compliant on-site offer.
- 6.1.52. As such, whilst it is acknowledged that the provision of on-site affordable housing is technically contrary to the Council's guidance, in the absence of any adopted policy indicating otherwise, it is not considered that the offer for on-site affordable housing is contrary to policy per se. When considering the absence of adopted development plan policy, weighing up the material considerations, the overwhelming benefits of the offer of a 30% policy-compliant level of affordable housing in a highly sustainable, town centre location for key workers such as the NHS who support these proposals, outweighs the perceived harm of the technical non-compliance with the Council's SPD guidance or emerging policy. It is our view that the clear and tangible benefits clearly and strongly outweigh the perceived harm.
- 6.1.53. In light of the above, weighing the policies and material considerations, it is considered that the redevelopment of the existing office building, to deliver 266 co-living units with 30% provision of discounted market rent units as 'affordable housing' to meet an identified need for key workers, supported by the NHS, in a highly sustainable brownfield location, will clearly make a valuable contribution towards Reading's housing targets and needs, complying with the NPPF and Local Plan Policies H1, H3 and EM1.

6.2. Design and Architecture

- 6.2.1. The adopted Local Plan includes various policies relating to design and architecture of future developments within Reading. These include Policy CC6 which states that scale and density of development will be related to its accessibility and location; Policy CC7 which states that new development must be of high quality design and enhance the character of the area; and finally, Policy H2 which states that development should maximise the efficiency of land use as well as minimising environmental impacts.
- 6.2.2. A Design and Access statement has been submitted alongside this application which sets out the site's location and how the proposed development has progressed and evolved to its design, scale and massing. As set out in the report, the proposed development's scale and massing is appropriate given the site's allocation within the Tall Buildings Cluster (CR10). It is also considered to be appropriate given the site's proximity to Station Hill, an area comprised of a number of tall buildings in a mix of building styles and forms. The heights of buildings in the surrounding area range from 3-4 storeys along Greyfriars Road to the west, and 13+ storeys to the east of the site (currently under construction). Therefore, the proposed development responds appropriately and contextually to the surrounding development in terms of scale and massing.
- 6.2.3. The proposed development is compliant with Policy CC6 which states that the densest and largest scale developments should be located in the most accessible locations, given the site's location within the centre of Reading Town. The site is served excellently by transport connections and is within a 5 minute walk from Reading Train Station.
- 6.2.4. Policy CR2 states that the developments within Reading are required to be of high quality design. As set out in the Design and Access Statement the design principles have been established based on analysis of

the existing context, key view points and detailed pre-application engagement with the Council, the Design Review Panel and Public Consultation.

- 6.2.5. The scheme proposes a careful use of traditional materials with contemporary detailing to respond to the site's context. The use of brick work and the specific colours and tones have been reviewed and considered to respond to the adjacent Station Hill development, as well as the surrounding character. The design incorporates active frontages at ground floor level to enhance the contribution of the site to the townscape and streetscene, as well as new public realm and landscaping. The overall design results in a building of a high quality which contributes positively to the area and immediate townscape of Station Hill and the station area.
- 6.2.6. Based on the sustainable and accessible location of the site and the need to optimise the land to meet identified housing needs, the overall scale and density of the proposed development complies with the provisions of the NPPF (paragraph 123 and 129) and Local Plan policy H1 and H2. The Design and Access Statement, together with accompanying various technical reports, demonstrates that the development has been appropriately informed by the surrounding context, engagement with the Council and is therefore compliant with policy.

6.3. Heritage and Townscape Visual Impact Assessment

- 6.3.1. A Built Heritage, Townscape and Visual Impact Assessment (HTVIA), prepared by Montagu Evans provides further details on the impacts of the proposal Proposed Development on nearby heritage assets, townscape and visual receptors.
- 6.3.2. Local Plan Policy CC7 states that developments must maintain and enhance the character and appearance of the area of Reading in which they are located. As set out in the HTVIA, the proposed development would introduce a high quality piece of architecture with a sympathetic stepped roofline that fits into the existing streetscape. The site currently accommodates a late 20th century building that has since undergone unsympathetic refurbishment, incorporating materials and detailing that are unrelated to the surrounding context. Consequently the HTVIA states that the proposed development would represent a vast improvement to the existing townscape and appearance of the immediate surrounding area.
- 6.3.3. Local Plan Policy EN1 states that historic features or areas of historic importance should have their settings protected and where possible enhanced. As identified in the HTVIA, the site is not located within a conservation area, or in close proximity to any historic assets. The closest heritage asset is the Grade I listed Greyfriars Church which is located approximately 245m to the south-east of the site. The report sets out that despite this the development remains appropriate and would preserve the setting and significance of the church.
- 6.3.4. Local Plan Policy CR10 defines tall buildings as 12 storeys or above, as such, the proposed development is categorised as a tall building. The proposals has responded to the context in which it is set, with the tallest point of the building located to the North East where there is a greater height and massing, and then steps down in height towards the southern edge of the site. The proposed development will fit sensibly into the edge of the cluster of the Station Hill development. The HTVIA sets out that the proposed development would be much lower than height than the cumulative schemes at Station Hill and is therefore appropriate and compliant with policy in townscape terms.

- 6.3.5. The HTVIA report concludes that the visual analysis undertaken within the report demonstrates that views beyond the immediate street would be limited. Given the site is not located within a conservation area and does not comprise of any heritage assets, neither is the wider area accommodating of many heritage assets it would not impact the setting of these assets. In agreement with the HTVIA's conclusions, the proposed development would introduce a high quality piece of architecture that fits into the existing setting along Greyfriars Road therefore complying with the NPPF and Local Plan policies CC7 and EN1.

6.4. Residential Amenity (including Daylight and Sunlight)

- 6.4.1. Local Plan Policy CC8 seeks to protect the living environment of existing residential properties and avoid unacceptable living conditions for new residential properties in terms of privacy, access to sunlight and daylight and harm to outlook.
- 6.4.2. A Daylight and Sunlight Assessment has been prepared by Point 2 and submitted as part of this application. The assessment finds that out of the 13 neighbouring properties assessed, all habitable windows within 11 of these properties comfortably comply with BRE guidance.
- 6.4.3. In relation to the adjacent building to the east on Garrard Street (part of the Station Hill development), it was identified early on that this property would be a sensitive neighbouring use, as such, the scheme has been designed sensitively by reducing the southern portion of the site to 7 storeys and including the courtyard to set the massing away from the boundary. The assessment has modelled the development based on consented plans, and finds that in terms of daylight, 72% of rooms would be compliance in terms of Vertical Sky Component and 99% rooms would meet No Sky Line criteria. Of the windows that fall short of VSC recommendations, all but 1 experience only relatively minor changes to their VSC, and each of these rooms that these windows serve would continue to meet BRE guidance. Therefore, the effects to these windows and rooms is not considered material, particularly considering that the site sits within the Reading Station Area which will undergo significant change over the coming years, and it would be considered that a more intense form of massing was always likely to come forward on the current site.
- 6.4.4. To the south of the site lies 60 Friar Street, which is in use as student accommodation. It finds that all rooms would meet VSC criteria and 93% of rooms meet NSL criteria. The 2 rooms that do not comply only fall slightly short of guidance and therefore in the context of a large-scale redevelopment site in the city centre environment, it is not considered to be an unacceptable impact.
- 6.4.5. In terms of outlook and privacy, the eastern elevation is set circa 30m away from the west facing elevation of the adjacent Station Hill development, and circa. 18m to the properties on the opposite side of Greyfriars Road. The east facing windows to the proposed co-living units will be angled slightly to avoid direct overlooking. Given the above separation distances, it is not considered there would be any unacceptable loss of outlook or privacy as a result of the proposed development.
- 6.4.6. Given the above, overall it is not considered there would be any unacceptable impact on the residential amenity currently enjoyed by neighbouring residents, and would therefore comply with the guidance contained within Local Plan Policy CC8.

6.5. Social Value and Economic Benefits

- 6.5.1. The Reading Local Plan sets out a vision to create a smart and sustainable town by 2050 that shares success to support and enable thriving communities, delivers a real sense of place and identity, thrives on cultural and cross-generational diversity, is recognised for its heritage and natural assets embeds technology to deliver innovation and low carbon living for all and welcomes ethical and sustainable businesses who support Reading.
- 6.5.2. An Initial Social Value Strategic Vision Document, prepared by Savills Earth and a Economic Benefits Summary Report, prepared by Savills Economics, accompanies this planning statement and provides an overview of the socio-economic benefits which will be delivered as part of the proposed development.
- 6.5.3. The proposed development will contribute to enhancing local skills and employment through work placements during the construction phase for up to 26 local students, 43 apprenticeships, creation of construction career events and £129,000 estimated social value of qualifications achieved as a result of the development. In regard to community benefits, the proposed development will reduce unemployment, support local businesses and provide much needed affordable housing. It is considered that the proposed development would deliver £8.0m of social value over a 30 year period.
- 6.5.4. The proposed development will support 100 on-site construction jobs and 50 net additional jobs during construction phase. Once operational, the proposed development £4.1m in cumulative public sector net income over 20 years, 55 homeworkers, £1.5m of additional local expenditure per annum at retail and food outlets, create 10 new retail or F&B jobs and 85 net additional operational jobs. It is considered that the proposed development will create a number of economic benefits, both directly and in-directly, as a result of the proposed development.
- 6.5.5. The benefits detailed within the Initial Social Value Strategic Vision Document and Economic Benefits Summary Report provides a detailed overview of the substantial benefits which will be delivered by the proposed development. These will contribute to the wider vision and objectives of the Local Plan and will enrich existing and future communities in Reading.

6.6. Landscape and Trees

- 6.6.1. Policy CC7 of the Local Plan sets out that 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, including landscaping. Policy CC3, relating to climate change, also sets out that use of trees and other planting should be used to provide shading of amenity areas, buildings and streets and to help to connect habitat designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions.
- 6.6.2. The existing site is characterised by limited landscaping features with small planters sited on Greyfriars Road in poor condition, contributing to a poor street frontage.
- 6.6.3. The proposed landscape strategy seeks to introduce high-quality landscaping features across the site to improve public realm, green infrastructure and contributing to a biodiversity net gain. At ground floor level, opportunities to enhance the streetscape are sought through use of high-quality materials and introduction of green infrastructure, including street trees utilising climate resilient species and moveable planters. Use of integrated lighting towards the entrance of the building and visitor cycle parking further activates the streetscene.

- 6.6.4. A ground floor courtyard to the rear of the site and terraces at seventh and twelfth floors provide external communal amenity spaces for residents with use of high-quality hardscaping materials and planters to accommodate raised beds and perimeter planting to enhance these spaces.
- 6.6.5. A Landscape Strategy and Drawings, prepared by Henshall Green, provide further details of the landscape design of the proposed development. The Landscape Strategy and Drawings should be read alongside this Planning Statement.
- 6.6.6. It is considered that the proposed development has sought to promote urban greening, integrate high-quality landscaping features in all available areas of the site, whilst utilising climate resilient and native planting where possible, complying with Policies CC3 and CC7 of the Local Plan.

6.7. Ecology

- 6.7.1. Policy EN12 sets out that new development should provide a net gain for biodiversity wherever possible. Under the Environment Act 2021, it is a statutory requirement for the majority of planning applications to demonstrate that a minimum net gain of 10% is achieved. The existing site comprises hardstanding and an existing office building with small planters formed of ornamental planting in poor condition. Therefore, it is considered that the existing site has limited ecological value.
- 6.7.2. An Ecology Survey and Appraisal and BNG Plan, prepared by Greengage, accompany this planning application and provide details of the ecological condition of the site and methods to ensure the proposed development achieves a minimum net gain of 10% in biodiversity. The Ecology Survey and Appraisal sets out the only vegetation present on site is ornamental introduced shrub planting in addition to three small trees. There are no protected or notable species recorded on site, and therefore no negative ecological effects are anticipated as a result of the proposed development. There is some limited potential for common nesting birds to be present within the trees and shrubs that are located at street level. Consequently, the only ecological protection recommendations relate to seasonal timing of clearance of this vegetation/or after a nesting bird check has been completed and a pre-demolition check is recommended.
- 6.7.3. The BNG Plan and accompanying metric demonstrates that the proposed development will achieve a 146.40% net gain in biodiversity, which significantly exceeds the statutory net gains in biodiversity required under the Environment Act 2021. This net gain is achieved through the proposed landscaping within the ground floor courtyard, upper floor terraces and rooftop level green roofs, which significantly increases the quantum of habitats on site.

6.8. Transport

- 6.8.1. Local Plan Policy TR1 states that major development proposals should implement measures to promote and improve sustainable transport facilities, through provisions to encourage walking, cycling and the use of public transport. Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 6.8.2. The Site is situated in a highly sustainable location, in the centre of Reading Town Centre and a short walk to Reading Train Station.

- 6.8.3. A Transport Statement, prepared by TTP, accompanies this planning application and sets out the baseline transport conditions of the site and the impact of the proposed development on the local highway network.
- 6.8.4. As set out with the Transport Statement, given the site is proposed as being car-free, there would be a significant decrease in vehicular trips associated with the co-living use compared to the existing office use. There would be an increase in trips taken by foot and public transport, however given the site's proximity to the train station and bus services in the area, it is not considered that there would be any adverse impact on the public transport network in the area.
- 6.8.5. In relation to standards for cycle storage, the Council does not have any specific standards for co-living accommodation. The Council's parking standards document sets out that for traditional C3 housing, 0.5 cycle spaces should be provided for 1- and 2-bedroom flats, and 0.2 spaces per room for student accommodation.
- 6.8.6. VervLife, the proposed operator of the scheme, has provided data from co-living schemes in London which they operate. It is considered that cycling is typically more popular in London than in other cities, and given the location of the site in the town centre and adjacent to the train station, it is anticipated that the majority residents will choose to walk or take public transport compared to cycling.
- 6.8.7. The data provided by VervLife (shown in table 4.1 of the Transport Statement) shows that within the 4 schemes provided as examples, there are 284 cycle spaces provided for 1,632 co-living units, and only 78 cycle spaces are occupied, providing an operational occupancy ratio of 0.048 cycle spaces per unit.
- 6.8.8. Given the above, the proposal seeks to provide 72 cycle spaces at a ratio of 0.27 spaces per unit, which is considered more than sufficient based on the anticipated mode share of cycling, the Council's Cycle Parking Standards and the highly sustainable location of the scheme. Furthermore, it is reasonable that the provision for this type of accommodation is between the provision required for C3 and student accommodation. The cycle store is located at first floor level at the southern end of the building, which can be accessed internally as well as directly from Greyfriars Road.
- 6.8.9. As mentioned above, the scheme is proposed to be car-free. As agreed with the Council's Highways Officer during the pre-application process, the site's and proposal's constraints mean that it would be excessively difficult to provide an off-street disabled parking bay without fundamentally altering the footprint and design principles of the scheme.
- 6.8.10. The refuse store is also located at first floor level and can be accessed directly from Greyfriars Road. It is proposed that the refuse vehicle will stop on-street to collect refuse which will be taken out of the refuse store by management staff. This arrangement is similar to the existing servicing arrangement for the office building.
- 6.8.11. The application is also accompanied by a Travel Plan, which sets out measures to encourage future residents to travel by active modes and public transport, as well as Delivery and Servicing Management Plan, which provides further detail on how deliveries and servicing will be managed by on-site staff.
- 6.8.12. The proposals are therefore considered to be in accordance with Local Plan Policies TR1 and TR5, and compliant in transport terms and will not result in any adverse highway impacts complying with the NPPF.

6.9. Energy and Sustainability

- 6.9.1. Policy CC4 sets out in meeting the sustainability requirements of this plan, developments of the sizes set out any non-residential development of over 1,000sqm shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. The Council's Sustainable Design and Construction SPD also sets out the importance of reducing energy consumption and mitigating the impacts of climate change through design.
- 6.9.2. An Energy Statement and a Sustainability Statement, prepared by Meinhardt, accompanies this planning application and details the energy and sustainability measures to be incorporated as part of the proposed development. The proposed development will incorporate mechanical and electrical systems, ensuring heating, ventilation and air conditioning systems are energy efficient and tailored for the co-living use. On-site energy provision has been incorporated through use of air source heat pumps. Overall, the development will achieve a 40.55% reduction in baseline emissions over Building Regulations Part L 2013, exceeding the 35% target as set out within Reading's Sustainable Design and Construction SPD. A carbon offset payment of £94,790 will also be secured through S.106 Agreement so that the scheme achieves net zero carbon.
- 6.9.3. A BREEAM Pre-Assessment, prepared by Greengage, accompanies this planning statement and sets out how the proposed development is environmentally considerate considering the embodied carbon of the proposals, whilst also meeting the requirements set out within the BREEAM V6.1 Mat 01 criteria. The proposed development seeks to achieve an 'Excellent' rating. The appraisal undertaken on the proposed design, including options for the superstructure, substructure, hard landscaping and building services, achieves 5no credits under BREEAM V6.1 Mat 01 plus a further exemplary credit, in line with the credits sought to be targeted at this stage.
- 6.9.4. Therefore, it is considered that the proposed development complies with Policy CC4 and the Sustainable Design and Construction SPD.

6.10. Air Quality

- 6.10.1. Local Plan Policy E15 requires that where development would introduce sensitive uses (such as residential) into an Air Quality Management Area, detrimental effects on that use will be mitigated, and such mitigation measures should be detailed.
- 6.10.2. An Air Quality Statement, prepared by Savills, accompanies this planning application and details the air quality impacts arising from the proposed development.
- 6.10.3. The Site is located within an Air Quality Management Area (AQMA) which covers much of central Reading and was declared in 2009 for exceedances of the annual mean NO₂ AQO. As such, this Assessment therefore identifies the mitigation measures that should be implemented during the construction phase of the project to minimise the impact of dust on air quality. When adhered to, the construction phase would not result in any unacceptable impacts on future residents.
- 6.10.4. During the site's operational phase, the proposed development will be car-free and will not produce a significant change in vehicle flow. Therefore, the indicative screening criteria presented by EPUK and IAQM

(2017) are not triggered and so the impacts for the operational phase are not considered to have significant effects.

6.10.5. Consequently, from an air quality perspective, the proposed development is acceptable and accords with Policy EN15 of the Local Plan.

6.11. Wind and Microclimate

6.11.1. Policy CC8 relating to amenity sets out that development should not cause detrimental impact on the living environment of existing residential properties in regard to wind where proposals involve new development more than 8 storeys. Policy CR10 also sets out that tall building proposals should mitigate any wind speed effects through design and siting.

6.11.2. A Wind and Microclimate Statement, prepared by RWDI, accompanies this planning application and details the proposed developments impact on wind and microclimates within the immediate vicinity of the site, given the proposed development and surrounding developments comprise of tall buildings. The Wind and Microclimate Statement sets out that the proposed development will not have an adverse impact on wind or microclimates in the local area and will integrate well from a wind and microclimate perspective with existing and future developments in the local area. It is considered that the Wind and Microclimate Statement demonstrates that the proposed development will not detrimentally impact the surrounding environment and complies with Policies CC8 and CR10.

6.12. Noise and Overheating

6.12.1. Local Plan Policy CC8 seeks to protect existing residents and future residents from the impacts of noise and vibration. Policy CC3 seeks to ensure that buildings maximise opportunities for ventilation to adapt to climate change.

6.12.2. A Noise Impact Assessment, prepared by Sol Acoustics, accompanies this planning application and assesses the impact of the proposed development on the amenity of both surrounding occupiers as well as for future residents within the co-living scheme.

6.12.3. A Noise Survey was undertaken in July 2024 and sets out the baseline noise conditions of the site. The survey found that one particular source of noise that is perceptible from the site is noise emanating from the Sainsburys service yard, which may have an impact on the south and east facing facades of the proposed development. The assessment concludes that in order to meet relevant internal noise criteria, windows should remain shut for east and south-facing facades overlooking the Sainsburys service yard.

6.12.4. Alongside the noise assessment, a TM59 Overheating Assessment has been produced by Meinhardt to assess overheating to co-living units. The assessment finds that there would not be any unacceptable overheating issues to the majority of the units, and where there is non-compliance, a mechanical ventilation strategy is recommended to provide ventilation to these units.

Agent of Change

6.12.5. Paragraph 193 of the NPPF states that planning policies should ensure that new development can be integrated effectively with existing businesses, and that existing businesses should not have

unreasonable restrictions placed on them as a result of development permitted after they were established. In the case of new development, the applicant (or 'agent of change') should provide suitable mitigation. In this instance, it is important to ensure that Sainsburys is not impacted negatively by the development via the imposition of unreasonable restrictions, and the business should remain viable and continue to grow.

6.12.6. As mentioned above, the south and east facing facades face towards the servicing yard serving Sainsburys, which receives deliveries and is active from the early hours of the morning, presumably relating to stocking and servicing the store prior to opening. As noted within the noise impact assessment, with relevant mitigation measures such as closed windows and mechanical ventilation, the rooms which these windows serve would not be unduly affected by operations at Sainsburys, whilst retaining compliant levels of internal noise levels and ventilation.

6.12.7. Given the above, it is considered that future residents would be adequately protected from impacts of noise and overheating, and therefore the proposals are in compliance with Local Plan Policies CC3 and CC8. The scheme would not prejudice operations at Sainsburys, in line with the guidance contained within NPPF Paragraph 193.

6.13. Archaeology

6.13.1. Policy EN2 Areas of Archaeological Significance requires an assessment of the archaeological impacts of development proposals to be submitted alongside a planning application.

6.13.2. A Desk-Based Archaeological Assessment, prepared by RPS, accompanies this application and details the archaeological potential of the site and the potential impact of the proposed development on archaeological remains. The Archaeological Assessment concludes that the proposed development will not impact any designated archaeological assets and is therefore compliant with policy.

6.14. Flood Risk and Drainage

6.14.1. Policy EN18 sets out that development will be directed to areas at lowest risk of flooding and all major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards.

6.14.2. Environment Agency (EA) data confirms that the Site is located entirely within Flood Zone 1 'Low Probability' and therefore the proposed development is located in an area at lowest risk from fluvial flooding. The EA mapping small areas of the Site are at a 'Medium' or 'High' risk of surface water flooding, however these are small areas of ponding associated with the existing infrastructure.

6.14.3. A Flood Risk Assessment and Drainage Strategy Report, prepared by Form Structures, accompanies this statement and sets out details of the drainage strategy and design for the proposed development. The proposed development will implement a new of surface water drainage network that will manage surface water runoff from the Site. The proposed surface water drainage strategy has been designed to manage runoff from the Site for all storm events up to and including 1 in 100 (1%) Annual Probability event, including a 40% climate change allowance. The design incorporates SuDS features to attenuate and treat surface water runoff, including use of permeable and porous paving and below ground attenuation tanks.

6.14.4. Therefore, the surface water flood risk identified in the baseline scenario will not be present in the post development scenario through use of SuDS features and the wider drainage design and it is considered that the proposed development is compliant with Policy EN18.

6.15. Land Contamination

6.15.1. A Desktop Contaminated Land Assessment, prepared by Lustre, accompanies this application and details the potential contamination risks arising from the site, based on historic land uses on the site and within the local area.

6.15.2. The Phase 1 Desk Study that is provided alongside this application concludes that it is unlikely that contamination is present on site in a circumstance which would lead to unacceptable risks to identified receptors. The sites most recent use as a commercial office represents a minor potential of contaminative land use. Therefore based no further works or mitigation measures are required for this application.

6.15.3. Local Plan Policy EN16 states that development should not be damaging to the environment and sensitive receptors through land pollution. Therefore, the proposed development is policy compliant in regards to a land quality perspective.

6.16. Fire Safety

6.16.1. A Fire Safety Strategy, prepared by Orion Fire, accompanies this application and sets out the fire safety strategy incorporated within the proposed developments design and how fire safety will be ensured once the development is operational. The Plan sets out the fire service access strategy, evacuation strategy, use of fire detection and alarm systems, horizontal and vertical means of escape (including use of two stair cores), smoke ventilation systems and sprinkler systems to safeguard the proposed development from fire risk. The Plan also sets out the measures incorporated into the design to limit fire spread, including structural wall specification and external wall materials in line with Building Regulations.

6.16.2. It is considered that the comprehensive strategy will ensure the safety of the building and its residents from risk of fire and enable safe evacuation and mitigation in the event of a fire.

6.16.3. The next section focuses on planning conditions and obligations.

7. Planning Conditions & Obligations

7.1. Planning Conditions

- 7.1.1. Paragraph 55 of the NPPF states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 7.1.2. The PPG notes (paragraph 007, ID 21a-007-20140306) that it is important the local planning authority limits the use of conditions that require their approval of further matters after the permission has been granted unless they are specifically justified. Such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed and that these conditions ensure that the timing of submission meets the planned sequence of developing the site. From October 2018, planning permission for the development of land may not be granted subject to pre-commencement conditions without agreement of the applicant.
- 7.1.3. Planning conditions that unnecessarily affect the ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission, should not be used. If the Council requires additional information in order to fully assess the proposal, we would welcome the opportunity to be able to provide this to the Council during the consideration of the application to avoid the need for pre-commencement conditions which would otherwise prohibit our client from meeting their programme.
- 7.1.4. At this stage, in addition to the standard time **limit and approved documents conditions**, it is anticipated that **planning conditions may be necessary in respect of the following matters:**
- Materials
 - Refuse and cycle storage
 - Noise and plant equipment levels
 - Delivery and servicing details
 - Accessibility design and delivery
 - Demolition Method Statement
 - Construction Management Plan
 - Ventilation strategy
 - SUDS strategy and details
 - Landscape details and management
 - Energy strategy details
 - Provision of refuse storage and cycle storage
 - Compliance with management strategy

7.2. S106 – Heads of Terms

- 7.2.1. Planning obligations can assist in mitigating the actual or potential impacts of development. They can only constitute a reason for planning permission if they meet the tests set out in paragraph 57 of the NPPF.

7.2.2. This states that the obligation must be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

7.2.3. It is anticipated that Heads of Terms to be applied to this consent may include:

- Air Quality Monitoring
- Car-free Development (restriction on parking permits in any future CPZ)
- Energy (Carbon Offset) Payment in Lieu
- Highways Contributions
- Monitoring Fees
- Payment of the Council's reasonable legal costs associated with the preparation and completion of the S106 agreement
- Restriction of co-living from being used as C3 residential

7.3. Community Infrastructure Levy (CIL)

7.3.1. It is noted that Reading have a CIL Charging Schedule published in 2015, however the schedule does not have a charge for large-scale purpose-built shared living or co-living. Therefore, it is considered that the proposed development is not eligible for CIL, however this will be confirmed with Officers during the course of the application.

8. Planning Balance

8.0.1. The proposals submitted under this application will help to address an identified housing need in a sustainable town centre location. The scheme proposals will deliver a substantial number of public benefits for the local area which are, as follows:

- **Delivery of much needed housing** in a sustainable location, offering an alternative housing product not yet offered in Reading;
- **Provision of policy-compliant level of on-site affordable housing (30%)** in a town centre location, providing affordable accommodation for key workers including those at the NHS and Royal Berkshire Hospital;
- **Fostering a sense of community:** through delivering a new housing product where the building design encourages new communities to form between residents through generous communal spaces at ground floor and twelfth floor levels;
- **Boosting the Local Economy:** through delivery of new full-time jobs to manage the building as well as significant jobs for the construction sector while the development is under construction;
- **Delivery of a high-quality design and active frontage** which will improve the character and appearance of the site within the wider townscape compared to the existing building;
- **Increasing engagement with the Local Community and improving social value:** through delivering a range of publicly accessible opportunities including events and accessible co-working, café and courtyard space through events coordinated by the operator VervLife;
- **Sustainability:** through increased urban greening and biodiversity and integrating renewable energy on-site and encouraging walking and cycling to the site.

8.0.2. Further detail of the public benefits, are set out in the submission documents, including the Economic and Social Value Benefits Summary Sheet, prepared by Savills Earth and Savills Economics. In our view, the scheme proposals are considered to be compliant with the Council's policy and guidance, and great weight should be given the proposals that make effective and efficient use of brownfield land to meet an identified housing need. In particular, the Council should be supportive of the high-quality design and enhancement of the site's contribution to the immediate townscape, the substantial delivery of on-site affordable housing for key workers, as well as the other public benefits summarised above.

8.0.3. Whilst it is acknowledged that the provision of on-site affordable housing is technically contrary to the Council's SPD guidance, in the absence of any adopted policy indicating otherwise, it is not considered that the offer of on-site affordable housing as discount market rent units is contrary to any adopted policy. It is our view that the clear and tangible benefits of the offer of a policy-compliant level (30% of the units) of affordable housing in a highly sustainable, town centre location, along with the other public benefits as detailed above, clearly and strongly outweigh any the perceived harm arising from the proposals.

9. Summary & Conclusions

- 9.0.1. This planning application seeks to bring forward a vacant site and redevelop it to deliver 266 co-living units with well-designed internal and external communal areas, delivering a much-needed purpose-built, flexible, and 'all-inclusive' rent housing product for Reading. There is clear planning policy support at a national and level for the delivery of new housing to meet a range of housing needs, particularly where there is an identified need as demonstrated by this application, and the Council should give great weight to the benefits being provided by the scheme.
- 9.0.2. It is considered that the proposed development will deliver a high-quality and market-leading co-living scheme in a central and sustainable location to meet an identified housing need for the local area. The proposed building is appropriate to the setting of the site and the local area, and incorporates well into the wider Station Hill redevelopment. Use of high-quality materials and a comprehensive landscaping strategy will ensure that the building positively responds to its context and substantially improves the site compared to the existing arrangement.
- 9.0.3. The relevant technical and environmental matters have been appropriately addressed. Therefore, for the reasons set out in this Statement and in the documents supporting this application, we request Reading Borough Council to consider these development proposals favourably and to grant planning consent.

Mark Thomson MRTPI
Director

+44 (0) 7464 675506
mark.thomson@savills.com

Fergus Wong AssocRTPI
Senior Planner

+44 (0) 7890 425304
fergus.wong@savills.com

Ben Tattersall MRTPI
Senior Planner

+44 (0) 7890 418052
ben.tattersall@savills.com