



BROAD STREET MALL PLANNING STATEMENT

JANUARY 2024

Planning Statement

“Part-demolition of existing retail units, car park and service areas, demolition and rebuild of car park ramp, and construction of a residential-led, mixed-use development fronting Queens Walk and Dusseldorf Way, including all necessary enabling and alteration works required”

and

“Part-demolition of podium deck on Dusseldorf Way and Queens Walk, amendments to existing retaining wall, excavation works and road and hardstanding re-alignment to create a temporary construction area related to proposed redevelopment works at Broad Street Mall”

Broad Street Mall, Reading, RG1 7QE

1st February 2024

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Client
McLaren (Broad Street Mall) Ltd and UREF III LP

Our reference
OP-08-22

1st February 2024

1. Introduction

1.1. This Planning Statement has been prepared by Opus Works Group Ltd to accompany an application for detailed planning permission.

1.2. The application is submitted on behalf of McLaren (Broad Street Mall) Limited and UREF III LP (hereafter referred to as the 'Applicant') for a proposed mixed-use development located at Broad Street Mall, Reading (hereafter referred to as 'the Proposed Development').

1.3. Detailed planning permission in respect of the Proposed Development is sought for:

"Part-demolition of existing retail units, car park and service areas, demolition and rebuild of car park ramp, and construction of a residential-led, mixed-use development fronting Queens Walk and Dusseldorf Way, including all necessary enabling and alteration works required"

1.4. To enable the Proposed Development to come forward, it is necessary to make offsite changes to allow for construction routes, compounds and access to building facades for demolition and construction (hereafter referred to as "the Temporary Construction Area"). In this regard, a separate detailed application is submitted for:

"Part-demolition of podium deck on Dusseldorf Way and Queens Walk, amendments to existing retaining wall, excavation works and road and hardstanding re-alignment to create a temporary construction area related to proposed redevelopment works at Broad Street Mall"

1.5. Given the inter-relationship of the two planning applications being sought, this planning statement considers matters relating to the Proposed Development and Temporary Construction Area, drawing upon detailed work undertaken by Project Team consultants where necessary to assist with the planning assessment.

1.6. The red line plans relating to both the Proposed Development and Temporary Construction Area are set out overleaf. There are varied red lines in each case to identify and account for works being undertaken at basement level, the detail of which is set out later in this report.

1.7. In addition to the above proposed works, minor internal changes will be required to parts of the shopping centre to cater for the demolition. The works comprise *inter alia* relocation of the public toilets and alterations to some units. Due to the minor nature of these works, changes within the shopping centre will be covered by separate planning application, where necessary.

1.8. The submission of this application for the Proposed Development follows wide-ranging, multi-stage pre-application discussions with a wide range of stakeholders and statutory

consultees, including planning and highways officers at RBC, Ward and Senior Council Members, Design South East, local heritage and residents' groups, local residents and businesses and community organisations either located within or in close proximity to Broad Street Mall (hereafter referred to as "BSM"). The detailed feedback provided has enabled significant, beneficial changes to be identified and proposed within the planning submission for the Proposed Development. Section 5 of this document describes the stakeholder engagement process in more detail.



Figure 1 – Red Line Plan, Proposed Development, Basement

- 1.9. This Statement assesses relevant planning matters associated with the Proposed Development and considers the development in the context of relevant planning policy and guidance, alongside relevant material considerations. As part of this process, consideration will be given to earlier consented schemes for mixed-use residential development, ref: 182137 (hereafter referred to as "the Extant Consent") and hotel development, ref: 182054 (hereafter referred to as "the Lapsed Consent") that have not come forward on site, with detail being provided to clearly identify why it has not been possible to implement the earlier consented schemes and why in turn this has necessitated a number of scheme changes.

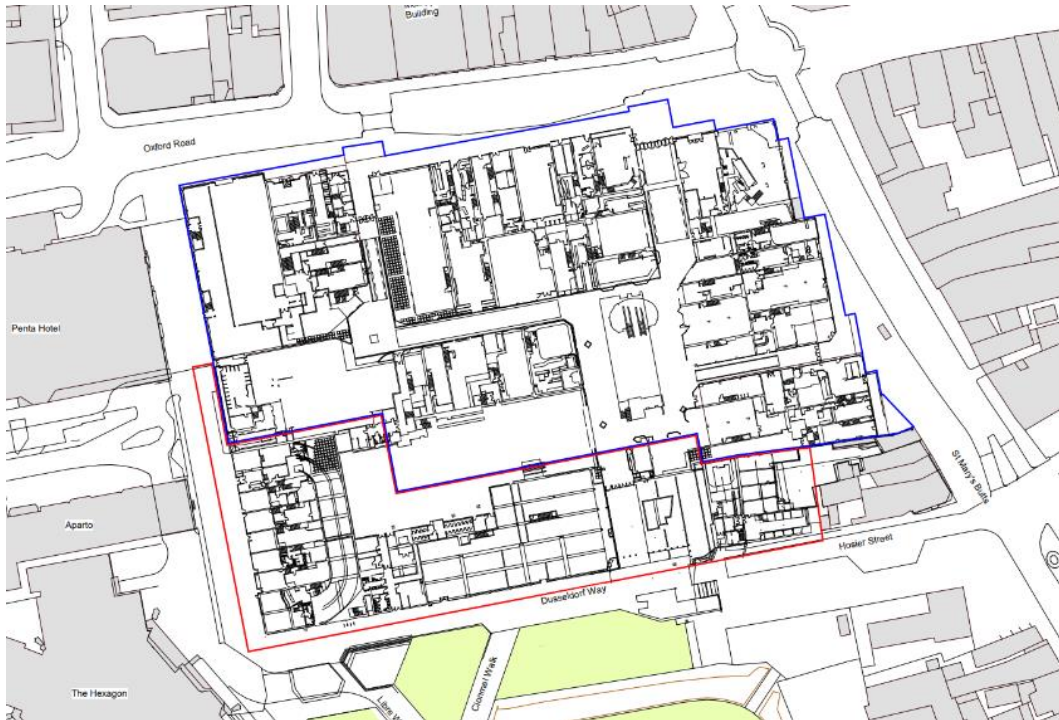


Figure 2 – Red Line Plan, Proposed Development, Ground Floor



Figure 3 – Red Line Plan, Temporary Construction Area, Basement



Figure 4 – Red Line Plan, Temporary Construction Area – Ground Floor

1.10. Further to discussions with Planning Officers and after review of the Council's "*Validation Requirements for Planning Applications, November 2021*" guidance, the following documents are submitted as part of the planning application for the Proposed Development:

- Completed Planning Application Forms and Ownership Certificates;
- Community Infrastructure Levy (CIL) Form;
- Planning Drawings – see drawing registers;
- Environmental Statement (ES) Volume 1: Main Environmental Statement – a document which forms the main body of the ES and which comprises of the following non-technical and technical chapters:
 - Chapter 1: Introduction;
 - Chapter 2: EIA Methodology;
 - Chapter 3: Alternatives and Design Evolution;
 - Chapter 4: The Proposed Development;
 - Chapter 5: Demolition and Construction;
 - Chapter 6: Socio-Economics;
 - Chapter 7: Air Quality;
 - Chapter 8: Noise and Vibration;
 - Chapter 9: Daylight, Sunlight and Overshadowing;
 - Chapter 10: Wind Microclimate;

- Chapter 11: Climate Change and Greenhouse Gases;
- Chapter 12: Effect Interactions;
- Chapter 13: Likely Significant Effects and Conclusions;
- Chapter 14: Environmental Management, Mitigation and Monitoring Schedule;
- ES Volume 2: Heritage, Townscape and Visual Impact Assessment – a separate heritage, townscape and visual impact assessment (HTVIA) document that is accompanied by a full set of views and verified images;
- ES Volume 3: Technical Appendices – comprises background data, technical reports, tables, figures and surveys. The following appendices are included:
 - Appendix: Introduction:
 - Annex 1: Location of Information within the ES ('wayfinding' document)
 - Annex 2: Competent Experts and Relevant Expertise
 - Annex 3: Glossary of Terms and Abbreviations
 - Appendix: EIA Methodology:
 - Annex 1: EIA Scoping Document
 - Annex 2: Cumulative Schemes List and Map
 - Annex 3: Traffic Data
 - Appendix: Socio-Economics:
 - Annex 1: Planning Policy Context
 - Appendix: Air Quality:
 - Annex 1: Professional Experience
 - Annex 2: Air Quality Policy/Legislation Context
 - Annex 3: Baseline Air Quality Review
 - Annex 4: Construction Dust Risk Assessment
 - Annex 5: Dispersion Modelling Approach
 - Annex 6: Air Quality Site Suitability
 - Appendix: Noise and Vibration:
 - Annex 1: Plant Noise Levels Used in Construction Noise Assessment
 - Annex 2: Glossary of Acoustic Terminology
 - Annex 3: Legislation, Planning Policy and Guidance
 - Annex 4: Noise Survey Data
 - Appendix: Daylight, Sunlight and Overshadowing:
 - Annex 1: Key Legislation, Planning Policy & Guidance
 - Annex 2: Drawings of the Existing Baseline and Proposed Development
 - Annex 3: Daylight and Sunlight Results
 - Annex 4: No Sky Line Contour Drawings
 - Annex 5: Window Maps
 - Annex 6: Sun Hours on Ground Assessment
 - Annex 7: Transient Overshadowing Assessment
 - Appendix: Wind Microclimate:
 - Annex 1: Wind Microclimate Report, December 2023
 - Appendix: Climate Change and Greenhouse Gases:
 - Annex 1: Professional Experience
 - Annex 2: Climate Change Proforma Guide
 - Annex 3: Climate Change Proforma

- Annex 4: Greenhouse Gas Context
 - Annex 5: Greenhouse Gas Baseline
 - Annex 6: Assessment Approach
- Appendix: Archaeology:
 - Annex 1: Archaeological Desk Based Assessment
- Appendix: Ecology
 - Annex 1: Preliminary Ecological Appraisal
- Appendix: Ground Conditions
 - Annex 1: Phase 1 Desk Study
- ES Non-Technical Summary (NTS) - A separate, shortform document providing a concise description of the Proposed Development, the alternatives considered, identified mitigation measures and the residual likely significant environmental and socio-economic effects.
- Arboricultural Impact Assessment
- Archaeological Desk-Based Assessment
- Biodiversity Net Gain Assessment
- BREEAM Pre-Assessment
- Outline Construction Environmental Management Plan (CEMP)
- Design and Access Statement, including Landscape DAS
- Energy Strategy
- Fire Strategy and Qualitative Design Review
- Flood Risk Assessment and Drainage Strategy
- Internal Daylight and Sunlight Report
- Landscape Management and Maintenance Plan
- Lighting Report
- Phase 1 Geo-Technical Report
- Planning Statement, including Consultation Statement and S106 Heads of Terms
- Preliminary Ecological Appraisal
- Property Management Strategy
- Sustainability Statement
- Transport Statement
- Travel Plan
- Utility Assessment
- Ventilation and Extraction Strategy
- Viability Report (replacing the Affordable Housing Statement)
- Waste Management Strategy

1.11. In addition, the following documents are submitted separately as part of the planning application for the Temporary Construction Area:

- Completed Planning Application Form and Ownership Certificate;
- Community Infrastructure Levy (CIL) Form;
- Planning Drawings;
 - BSM Temporary Construction Site Plan – Basement, ref: BSM-AHR-ZZ-B1-DR-A-08121 Rev S2
 - BSM Temporary Construction Site Plan – Ground Floor, ref: BSM-AHR-ZZ-B1-DR-A-08121 Rev S2

- Construction Ramp Sections Sheet 1, ref: 3104-S-SK-018 Rev P04
- Construction Ramp Sections Sheet 2, ref: 3104-S-SK-019 Rev P04
- Construction Ramp Sections Sheet 3, ref: 3104-S-SK-020 Rev P04
- Construction Ramp Sections Sheet 5, ref: 3104-S-SK-021a Rev P02
- Temporary Construction Ramp – GA, ref: 004 Rev P01
- Temporary Construction Ramp – Swept Path Analysis, ref: 005 Rev P01
- Proposed Construction Access Arrangement, Basement Swept Path Analysis for 16.5m Articulated Vehicle, ref: 008 Rev P01
- Engineering Technical Note, 3104-S-RP-006
- 8 x CGI's to demonstrate how Dusseldorf Way will be altered from existing, through demolition and upon completion and making good.

1.12. For completeness, the Environmental Statement documents, Planning Statement, Arboricultural Impact Assessment, Archaeological Desk-Based Assessment, Outline CEMP, Preliminary Ecological Appraisal, Flood Risk Assessment and Drainage Strategy, Phase 1 Geo-Technical Report and Transport Statement cover both planning applications.

1.13. This document provides an overview of the Application Site and the Proposed Development and sets out a justification for the development, including the need for the Temporary Construction Area. The Planning Statement makes the case for the proposals as follows:

- Section 2 provides detail regarding the site and surrounding area
- Section 3 identifies planning history pertinent to the scheme, including the Lapsed Consent and Extant Consent
- Section 4 sets out the rationale for changes to the Lapsed Consent and Extant Consent alongside detail of main components and features
- Section 5 identifies the stakeholder engagement undertaken during the pre-application process and how this has informed design development
- Section 6 sets out the development proposals in respect of built form, landscaping and public realm and the temporary construction area
- Section 7 outlines relevant planning policy context
- Section 8 sets out the planning assessment of the proposed development against policy requirements and relevant material considerations.
- Section 9 provides a summary of CIL and proposed planning obligations.
- Section 10 sets out our conclusions on the proposed development.

- 1.14. This application represents the culmination of significant due diligence to determine how best technically and commercially to bring forward much-needed development at BSM. Overall, the applications being progressed represent a significant opportunity to deliver development that optimises the potential of the site, make a substantial contribution to the provision of new homes in Reading and provide high-quality flexible retail floorspace that will enable BSM to provide an improved customer experience and attract and retain customers.

2. The Site and Surrounding Area

- 2.1. The 0.62ha (0.79ha at basement level) site comprises part of the existing BSM, situated in the centre of Reading. Further to technical due diligence, the detail of which is set out in later sections of this document, it was considered technically and commercially impractical to seek to implement the extant residential consent for part-development of the BSM. It is now intended to part-demolish the existing shopping centre as evidenced by the red line for the Proposed Development.
- 2.2. In taking this approach, existing operations within the retained portion of BSM will largely continue in their current form, albeit some minor internal alterations will be required to make good walls, entrances and walkways.
- 2.3. The site is bound to the north by Oxford Road, to the east by St Mary's Butts, to the south by Hosier Street which extends into Dusseldorf Way, and to the west by Queen's Walk.
- 2.4. BSM is an established retail, leisure, food and beverage destination in the town and was originally constructed in the late 1960s which opened in 1971.
- 2.5. The shopping centre covers the area subject to the Proposed Development and extends beyond this to the north. Land within the applicants' ownership identified by the blue line on the Site Location Plan.
- 2.6. The shopping centre is arranged over a basement used for servicing and ground and first floor retail and community uses. At first and second floor a public car park currently operated by the Council sits behind the retail units within the structure of existing built form. At roof top level the public car park spans the majority of the wider shopping centre site. The public car park currently comprises c.700 car parking spaces and operates 24-hours a day, seven days a week.
- 2.7. There are both internal and external areas to BSM, with the external units and car park areas situated directly above predominantly forming the developable area identified within the red line.
- 2.8. The basement level extends underneath the entirety of Broad Street Mall, including the proposed development site and includes numerous plant rooms, the main waste storage area and storage facilities associated with the retail units above. In addition, the Council uses space abutting the service area, adjacent to the exit route from the car park and opposite the Hexagon theatre for storage uses and power generation.
- 2.9. The basement, and the public car park which sits above the Mall, is accessed from a vehicular route from Castle Street (south) or Caversham Road, more commonly known as

the Internal Distribution Road (IDR) to the west. Above the Mall is office space within Fountain House (northwest corner) and Quadrant House (southeast corner).

- 2.10. The surrounding area is typified by a mix of retail, commercial, and leisure uses, including offices, shops, restaurants, pubs, the Hexagon Theatre and Church of St Mary.
- 2.11. In terms of relevant planning designations, the Site is located within Central Reading, the West Side Major Opportunity Area and Western Grouping Tall Building Area, Central Core, Office Core and the Primary Shopping Area. The Site is also located within the emerging Hosier Street Framework Area which envisages comprehensive regeneration across the Council's former Civic Offices site and adjacent landholdings, including Broad Street Mall. The Site is located in Flood Zone 1 (low risk).
- 2.12. The Site is not located within a Conservation Area but is located adjacent to St. Mary's Butts/Castle Street and Russell Street/Castle Hill Conservation Areas. There are also a number of listed buildings and monuments located within close proximity to the Site, including the Church of St. Mary (Grade I listed) on the eastern side of St Mary's Butts; the Queen Victoria Jubilee Fountain (Grade II listed); the Allied Arms Inn (Grade II listed); 55 and 55A, St Mary's Butts (Grade II listed); and Jubilee Cross (Grade II listed).

3. Planning History

- 3.1. Following the construction of Broad Street Mall in the 1960s there have been a number of planning applications submitted to Reading Borough Council. A summary of the most relevant planning applications relating to the Site, including the extant and recently lapsed permissions which the Proposed Development intends to replace, are set out below.
- 3.2. Planning permission was granted on 18th August 1999 for the demolition of 3 existing two-storey rooftop maisonettes and single storey management offices on the roof and the creation of 81 roof top public car parking spaces including access ramp from existing car park (Ref: 991830).
- 3.3. On 8th June 2016 planning permission was granted for External alterations and installation of a new entrance foyer to Fountain House fronting Queens Walk, plus associated works (Ref: 160581).
- 3.4. Planning permission was granted on 17th January 2018 for the erection of a temporary two and part three-storey building (constructed using shipping containers) to create a mixed-use urban market comprising Retail (Use Class A1) and Restaurants/Cafés (Use Class A3), including use of external spaces at roof level; Refuse store, cycle parking and associated works (Ref: 171230). 3.5
- 3.5. Planning permission was refused on 26th June 2018 for the erection of a temporary three-storey building (constructed using shipping containers and timber frames/cladding) to create a mixed-use Urban Market comprising Shop, Restaurant/Cafe, Bar and Hot Food Takeaway Uses (Class A1/A3/A4 Use), including shared circulation and external seating spaces; refuse store, cycle parking and associated works (Ref: 180800). 3.6
- 3.6. On 2nd August 2018 an application was approved for the amalgamation of Units 37a & 55-56 to form a single Retail Unit (Class A1) arranged over Ground and Basement Floors. Installation of Shop fronts to Oxford Road Elevation and Return Mall Elevation (Ref: 180851).
- 3.7. Planning permission was granted on the 13th September 2018 for the subdivision of a three-storey retail unit (Class A1) and change of use to form: 1x retail unit (Class A1) at part basement / part ground floor; 2x flexible retail or restaurant units (Class A1/A3) at ground floor level; and 2x assembly & leisure units (Class D2) - 1 at part basement / part ground floor & 1 at part ground, part first floor level, together with shared access and means of escape; associated replacement shopfront works and associated external alterations on Oxford Road and Queens Walk frontages (Ref: 180823).

- 3.8. Planning permission was granted on 2nd November 2018 for external alterations comprising the installation of replacement shopfront and entrance at ground floor, and installation of two fixed windows and two bi-folding windows at first floor (Ref: 181613).
- 3.9. Most recently, the amalgamation of units 49- 50 and 52 and a change of use from Use Class E (Commercial, Business and Service) to a sui generis use to enable a family entertainment centre to come forward was approved on 6th December 2023 (Ref: 231464).
- 3.10. In the context of the proposals now being submitted to the Council for determination, two later planning consents are material considerations for which significant weight should be attached in the decision-making process
- Planning permission was granted on 4th November 2019 for Demolition of all existing structures, erection of a part 7, part 8 storey building for use as 101 bed Hotel (Class C1 Use) at Ground - 8th Floor and Restaurant with ancillary Bar (Class A3/A4 Use) at ground floor, with means of access, servicing and associated works – this area covering the former 'Eva's nightclub'. This permission was not implemented and has now lapsed.
 - Planning permission was granted on 6th December 2021 for Construction of three residential buildings (Use Class C3) ranging in height from 5 to 20 storeys above Broad Street Mall (Site E to provide 42 units, Site B to provide up to 134 Units and Site A to provide up to 148 units) and provision of a podium level amenity area. Site C - construction of 16 storeys above Broad Street Mall (total of 18 storeys from ground level on South Court) comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors (Use Class C3, to provide up to 98 units). Creation of ground floor retail units (Use Class A1/A3/A4) fronting Dusseldorf Way and ground floor retail (Use Class A1/A2/A3) fronting Queens Walk, all necessary enabling and alteration works required within the existing Broad Street Mall basement, ground and upper floors. Associated car park alterations, provision of servicing and refuse storage, cycle parking, public realm, landscape, and other associated works – this area covering land within the demise of BSM. This permission has not been implemented but remains extant.
- 3.11. Other planning history for the Site relates to minor development such as advertisement consent, change of use applications within the Mall, and discharge of planning conditions.

4. Rationale for Change to the Earlier Permissions

4.1. There are a number of technical, operational and legislative issues that have necessitated a full review of the Extant Consent and the development of alternative plans; including the area subject of the Lapsed Consent. The resultant proposals consequently meet updated, more robust legislative and space standards, enable BSM to remain open and address some of the less desirable features of the earlier permissions.

4.2. To summarise, the following matters have been addressed within the submitted proposals:

- Compliance with the Building Safety Act
- Resolution of structural engineering challenges that would have seen significant impact on the operation of BSM and the closure of the existing car park ramp
- Provision of policy-compliant dwelling sizes
- Removal of the separate affordable housing block
- Use of the hotel plot, which has not come forward to provide a comprehensive redevelopment along Dusseldorf Way and Hosier Street
- Separation of residential and amenity space from surrounding public realm
- Use of traditional, higher-quality materials
- Opportunity to better address housing need within Reading
- Assisting the Minster Quarter
- Delivering BSM's Future Vision

4.3. More visual detail is included within Section 5 of the Design and Access Statement (DAS) supporting the application and is therefore not repeated here, but further rationale to underpin the need for the above changes in a planning context is set out below.

Building Safety Act

4.4. The introduction of the Building Safety Act post-consent of the Extant Consent mandates that all residential developments over 18m in height should be served by more than a single staircase. The Extant Consent had single staircases in each of the blocks and therefore could not have been constructed irrespective of the consent in place. Accordingly, design

development has been undertaken to ensure compliance with updated and necessary legislation.

Resolution of structural engineering challenges

4.5. The Extant Consent sought to build the new towers on top of the existing shopping centre and car park. The proposed engineering approach involved:

- Threading a structural core through the centre of the existing car park ramp which further to detailed review was concluded as unbuildable on Health and Safety and logistical grounds and which would have led to closure of the car park during the build process; and
- Threading three other structural cores through existing parts of BSM, notably at the Oxford Road main entrance and the Dusseldorf Way entrance. Irrespective of the technical difficulties associated with building the structural cores, implementation of the Extant Consent in this manner would have led to significant parts of BSM being closed for much, if not all, of the duration of the construction programme in order to safeguard customers and tenants.

Provision of Policy-Compliant Unit Sizes

4.6. A number of the apartments within the Extant Consent were designed at sizes below the minimum area requirements of the Nationally Described Space Standards (NDSS). As changes to the scheme are required to meet legislative and technical requirements, as set out above, it has also been necessary to address this area of under-provision to ensure that fit-for-purpose accommodation comes forward in line with policy expectations.

Removal of the separate Affordable Housing block and use of Hotel plot

4.7. The Extant Consent provided its proposed affordable housing offer within a separate block, located at roof level, on the Oxford Road frontage. It is considered that this approach had the following shortcomings:

- Inability to implement the consent due to the structure running through the BSM Main Entrance from Oxford Road which would have resulted in the Mall Entrance and a number of prime location retail units having to close during construction.
- The provision of a separate affordable block / poor door within the development scheme, which doesn't contribute towards generation of mixed and balanced communities.
- The impact on the Oxford Road streetscape and adjacent listed buildings.

- 4.8. Taking this into account, it has been determined to utilise the area associated with the Lapsed Consent to enable the inclusion of affordable housing as a core principle rather than a bolt-on solution, which will not only ensure that the comprehensive regeneration of Dusseldorf Way and Hosier Street is realised through provision of residential-led, mixed-use development, but that a tenure-blind scheme can come forward to resolve one of the less successful elements of the earlier proposals.

Separation of residential and amenity space from surrounding public realm

- 4.9. As noted previously, the Extant Consent was proposed on a basis of implementing new cores through BSM to deliver new residential and amenity spaces above. Taking this approach meant that all residential and external amenity spaces within the development were located at significant distance from Dusseldorf Way and Queens Walk below, interrupting potential for natural surveillance and interaction with this space. It is considered that the external spaces proposed, which were essentially delivered at car park level with minimal separation, were compromised and would not form successful spaces that would encourage use. The updated proposals provide for greater interaction with adjacent public realm and provision of more usable, integrated spaces.

Use of traditional, higher-quality materials

- 4.10. The engineering solution associated with the Extant Consent required structural cores to be placed through BSM with the towers above cantilevered from each of the cores. To reduce loadings on the cores, a lightweight façade was proposed with this contributing to a relatively poor physical appearance that would be likely to reduce over time due to lower durability of materials used or require greater maintenance, with this cost being passed down to residents.

Opportunity to better address housing need within Reading

- 4.11. Reading Borough Council is undertaking a partial update of its Local Plan (LPU), which will take into account national policy changes. In this regard, the Government imposed a 35% uplift on housing numbers on twenty urban authorities in 2021, including Reading.
- 4.12. The Council has calculated that 877 new homes are needed per year to meet government targets using the standard methodology against 689 homes per year in the Local Plan. The Council has commissioned a Housing Needs Assessment to establish housing need in the Borough and concludes at paragraph 2.8 of the LPU that local need is likely to be considerably lower than the figure produced by the standard methodology, but still higher than the current Local Plan requirement.

- 4.13. Consideration of housing delivery is made in relation to Policy H1 in the LPU and this identifies that meeting local need within the capacity of sites in the Borough will allow for delivery of between 735 and 800 homes per year up to 2041.
- 4.14. Further, the Council acknowledges the need to deliver 'family homes' citing under-provision over the past decade and corresponding proposed changes in Policy H2 and CR6 to seek higher delivery of three bedroom homes across the Borough.
- 4.15. To deliver the proposed further new homes, the Council undertook a 'Call for Sites' earlier in the year to allow new sites for housing to come forward. A Regulation 18 consultation on these proposals is ongoing, supported by an update to the Housing and Economic Land Availability Assessment undertaken to underpin assumptions in relation to the Local Plan 2019, which will review opportunities for more efficient use of existing allocations and permissions.
- 4.16. As a brownfield, sustainable site the new proposals at BSM can better deliver on the Council's aspirations, particularly advancement of greater housing quantum without requiring other sites to come forward and provision of larger-sized accommodation to meet identified need.

Enabling the Minster Quarter

- 4.17. Whilst the consented proposals were brought forward at a similar time to the Minster Quarter Outline Area Development Framework (MQOADF), there was no certainty as to the timeframe for this adjacent area coming forward at the time of determination.
- 4.18. In Autumn 2022, the Council commenced a tender process to identify a Development Partner to progress the Minster Quarter project, which comprises land to the south of Broad Street Mall, to the west of the Hexagon and to the north of the Magistrates Court and Police Station. It is expected that a Development Partner will be announced in early 2024.
- 4.19. As part of the tender process, the Council has identified three Strategic Objectives; delivery of Affordable Housing; provision of high-quality public realm and implementation of zero-carbon development which form a context for the Council's ambitions not only for the area, but development within the Borough.
- 4.20. Alongside the Strategic Objectives are Key Development Principles relating to culture, leisure, masterplanning, asset management and connectivity that form the wider planning framework within which BSM is expected to play its part.
- 4.21. Accordingly, as part of our proposals, significant consideration has been given to interlinkages with the MQOADF, particularly in relation to public realm and how the wider development framework can be brought forward in a timely and co-ordinated manner.

Delivering Broad Street Mall's Future Vision

- 4.22. The applications play a significant part in the future vision for BSM. In this manner, the addition of 600+ residential units into the heart of Reading and above the Mall will provide a great opportunity to both continue, and expand, upon the place that the Mall has within the community.
- 4.23. It is the intent that BSM will continue to be at the heart of the community and able to service the needs of the residents from a health and well-being point of view with our NHS doctor's surgery and on-site gym complex, to the leisure use of the Biscuit Factory cinema, Spinners bowling darts and crazy golf and the soon to open in 2024 Funbox that is aimed at family entertainment with an offering of games and entertainment for all the family.
- 4.24. It is proposed that the leisure and community uses will integrate with the existing food and retail offering, which will be supported more greatly through the new development and help secure and expand upon employment opportunities, which will assist in servicing the needs of the people now living so close to the Mall.
- 4.25. The integration of retail with residential and with leisure enhances the wider vision for Reading to make BSM a part of the emerging trends of blurring the lines between home, work and leisure activities and setting the Mall up to be one of the main reasons to call Reading home.

Moving Forward

- 4.26. Taking into consideration the above, it is clear that the extensive due diligence undertaken and desire to provide a multi-functional place will enable a truly deliverable scheme to emerge that meets policy and legislative requirements and delivers on the Council's aspirations for this site and wider locality. In this manner, the Proposed Development features the following main changes:
- Isolation of the developable area (red line) to that along Queens Walk and Dusseldorf Way, allowing the majority of internal units within BSM to continue operations.
 - Demolition of buildings within the developable area to allow a less complex, technically and commercially deliverable engineering solution to come forward in place of the cantilevered proposals associated with the Extant Consent.
 - Regeneration of the basement, ground and first floor areas following demolition to allow fit-for-purpose and increased active frontage to be delivered along Dusseldorf

Way, Hosier Street and Queens Walk, alongside purpose-built servicing and supporting uses.

- Delivery of housing and amenity space to lower levels within the development, as these can now be built down to ground level, enabling greater quantum of housing to come forward and greater interaction with surrounding public realm..
- All apartments can now meet Nationally Described Space Standards (NDSS) and all are designed to be wheelchair adaptable (M4(2)) or wheelchair accessible (M4(3)).
- Use of traditional materials, which provides for a higher-quality architectural response that is more sympathetic to the surrounding area and which will ensure greater durability and longevity of the scheme.
- All residential blocks feature dual stair cores as a means of access and escape and therefore meet Fire Safety legislative requirements.
- The residential proposals are 'tenure-blind' and seek to provide greater quantum in larger sized units and a more appropriate mix in line with Policy CR6.
- By building from basement level upwards, the towers can be located as envisaged by planning policy. The removal of the separate affordable block reduces impact on Oxford Road and listed buildings to the north of the site.
- Creation of an improved access/egress from the existing car park via changes to the location of each, amendments to the road layout and provision of a new two way car parking ramp.
- Provision of a range of internal and external amenity spaces throughout the development, which benefits from being built down to street/basement level, allows a better user experience and greater interaction/surveillance with Dusseldorf Way
- More efficient use of the site allows more housing to come forward in line with emerging policy without unacceptable impact on surroundings.
- The development has been designed to integrate with the emerging proposals for land to the south at the Minster Quarter, allowing the wider site to come forward in line with policy aspirations and rejuvenate this area of the Town Centre.
- The scheme will support and enhance the retail, community and leisure offer at BSM by bringing residents to this area of the town centre. In turn, BSM will become a more commercially-resilient and interesting place to visit.

5. Stakeholder Engagement

- 5.1. In addition to the technical due diligence undertaken, the Design Team have sought to engage with Reading Borough Council officers and Members, local stakeholder groups, BSM Traders and local residents and businesses during the pre-application stage. The feedback received has specifically influenced the overarching design approach.

Consultation undertaken to date

- 5.2. Meetings have been held with the following groups to date:

- Abbey Ward Members - 11th November 2021, 3rd March 2022, 5th December 2022, 21st March 2023, 25th January 2024
- Meeting with Cllr. Leng – Lead Member for Planning and Assets, 27th June 2023
- Reading Borough Council Officers – 5th August 2022, 19th October 2022, 5th December 2022, 22nd December 2022
- Design South East, 28th June 2023
- Broad Street Mall Traders Engagement Events – 3rd – 5th July 2023
- Public Exhibitions – 13th and 19th July 2023
- Reading Civic Society, Conservation Area Advisory Committee, 13th July 2023 (Pre-Exhibition)
- Reading BID, 19th July 2023 (within Public Exhibition)
- Baker Street Area Neighbourhood Association, 19th July 2023 (within Public Exhibition)
- Presentation to Reading Older Persons Forum – 13th October 2023
- Meeting with Historic England – 8th November 2023
- Reading Borough Council Officers – 12th December 2023

- 5.3. In addition, all Reading Borough Councillors were notified of the public exhibitions and Reading Economic Development Agency (REDA) and Reading BID were invited to the exhibitions.

- 5.4. To provide notice of the exhibitions, a leaflet drop to c.3,000 homes and businesses was undertaken a week before the first event and notices were placed on Nextdoor and InYourArea. Press releases were also sent to Reading Chronicle and Reading Today, who published details of the event in their respective publications and online.

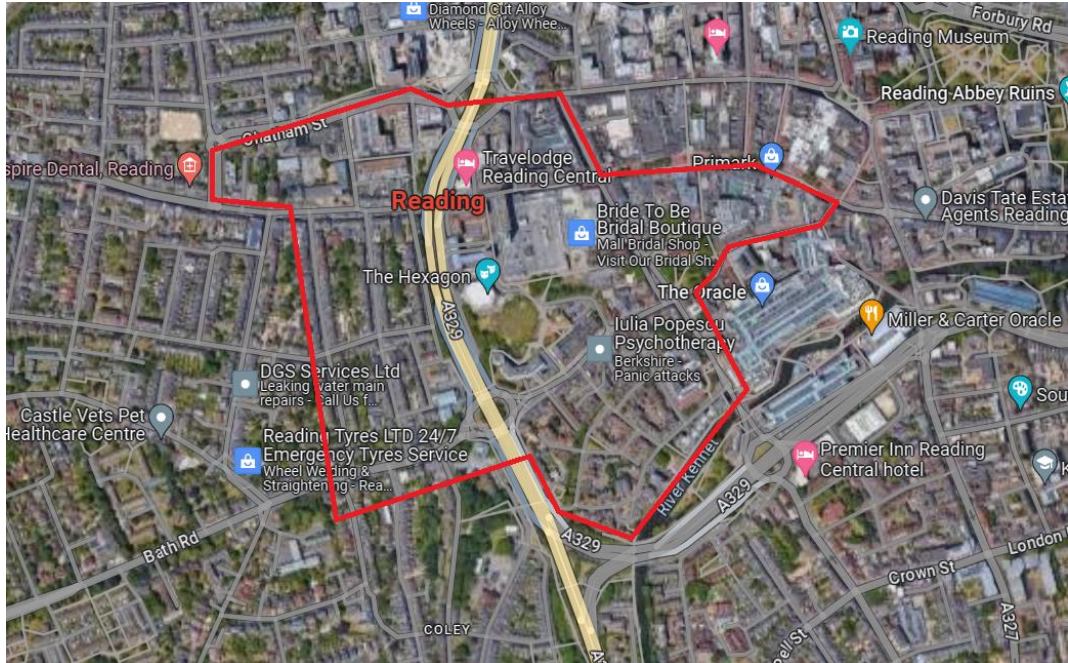


Figure 5 – Area of leaflet drop for July 2023 Public Exhibitions

- 5.5. To support the public exhibitions, a dedicated project website – www.bsmfuture.co.uk was developed and published. This went online on 13th July to coincide with the first exhibition.
- 5.6. In the region of 170 people attended the exhibitions, whilst the web page attracted 821 individual users over the initial engagement period. The exhibition was held in a vacant unit within BSM providing significant space for 28 exhibition boards and supporting documentation, allowing interested parties full detail of the rationale for change and consequent proposals. A copy of the exhibition boards forms Appendix 1 to this document.



Figure 6 – Photo from Public Exhibition, 19th July 2023

- 5.7. 25 sets of comments were received following the exhibitions, a summary of which is set out below. Our advice on potential design amendments is provided where considered appropriate.

Summary of Comments Received

Design

- Good to have tall buildings. Looks attractive (2 comments)
- Design is fine overall
- There should be a separate fire descent tower(s)
- Appears to fit into the existing buildings
- Sensitive to local heritage
- It's ginormous. Smaller blocks better.
- Big improvement on earlier proposals (2 comments).
- Will better integrate Dusseldorf Way
- Like being brave and pushing for height
- Architecturally bland and uninspiring; the design lacks imagination
- Need to retain the historical reference point that is the brutalist design of the car park
- Choice of brickwork fits with Reading housing
- Some of the street views show the scheme in stark contrast with its heights and massing
- Towers will become a costly, unsightly carbuncle
- Mass of the blocks is far too large for the site in terms of density and height
- Should provide balconies (2 comments)

Layout

- Space is used productively
- Nice mix, better proposed offer of flats, 2 and 3 bed
- Support for increasing residential unit sizes
- Concern that the single block of cycle parking will be under-used; too few cycle spaces; increase size of cycle provision; more cycle storage

- Use BSM roof for green space, playground (and pool); turn car park into green space for residents (3 comments); would be great to create a roof terrace that everyone could enjoy or social clubs/park
- Added green space is great (2 comments)
- Height quite notable, would have preferred more spread across Area E
- Need communal laundry, nurseries, communal spaces
- Will courtyard gardens work? Are they too overlooked, shaded?
- Like the communal layout
- Opportunity to create a whole row of south-facing hospitality units in the walkway from the Minster to the Hexagon (2 comments)
- Block A is completely overbearing in relation to the Hexagon and student accommodation
- Looks like the buildings could cause a wind tunnel
- Don't like inactive frontage on Queens Walk

Public Realm

- Welcome the redevelopment of Dusseldorf Way and Queens Walk
- Like plans to make neighbouring walkways and the shopping centre friendlier and safer
- Would be good to see inclusion of community gardens to replace Lavender Place
- Little green space available locally; lack of open space within the development
- Doesn't seem to improve cycle or bus infrastructure at all; add cycle lanes
- Public realm would benefit from fountains or ground sprays.

Housing

- A high proportion of affordable housing is still a possibility and should be a condition of planning consent
- We do not have enough social housing for Reading
- A mixed community will be an asset to Reading
- I like the idea of having more properties close to the town centre (2 comments). Takes pressure off greenfield sites and will improve the economic viability of the area

Sustainability

- No indication of climate change adaptation; design doesn't appear to incorporate any mitigation for climate change effects
- Will flats be naturally ventilated
- How will flats be heated?

Uses

- Pleased to see removal of the hotel from the scheme

Other

- Like the thought that has been put into the development and how it interacts with surrounding space
- Some creative ideas in regenerating this important area of Reading
- Where is the playground? School? GP Practice? (5 comments)
- Has thought been given to accommodation for let? (2 comments)
- Include swift bricks to enhance ecological credentials
- Impact on the Jesse Terrace/Baker St Conservation Area and Minster Conservation Area. Disagree with the view that they won't be compromised.
- A sculpture made by the community would give the place a more welcoming feeling
- Concerns that the development will be able to progress without significant impact on the shopping centre given limited access and impact from noise and dust

5.8. Many of the comments provided are similar to advice given by the Council's Planning Department and D:SE, the detail of which is provided in Appendix 2, but which can be summarised as follows:

- This well-presented scheme is an improvement on the extant planning permission. We support the increase in height; however, the configuration of the layouts results in towers that are relatively wide and lack elegance. The architecture is also somewhat generic, rather than rooted in its Reading context.
- There is a need to justify the increase in height. Whilst this creates a number of benefits and responds to emerging policy there is a perception of additional harm arising to adjacent heritage assets.

- The junction to the north between new and existing built fabric is clearer than in the consented scheme. However, retaining the deck car park and omitting Building E moves the focus of investment south, at the expense of the whole site.
- There is a stark difference in quality between the north and south-facing apartments and a lack of private external amenity space throughout. Some apartment layouts, particularly in Building C, are also problematic. External communal amenity space is neither generous nor easily accessed.
- It is disappointing that the low carbon strategy focuses on operational carbon, rather than whole-life carbon. Whilst it is encouraging to hear that Minster Quarter is coming forward, we are concerned that placemaking opportunities will be missed unless both are designed coherently to form a new part of Reading.

Responding to Stakeholder Comments

5.9. To respond to the comments made, significant changes have been made to the proposed scheme, which can be summarised as:

- Provision of increased vertical emphasis to provide a slender built form
- Change in the rhythm of horizontal banding within the tower structures to help accentuate the vertical emphasis within the design
- Change to the lantern structures that complete each tower to enable structural columns to extend to roof level and provide a lighter crown to the buildings
- Provision of balconies to support proposed internal and external amenity spaces and enable an increased range of private and semi-private spaces within the development that exceed the 'per resident' total of the Extant Consent
- Delivery of greater numbers of much-needed housing to respond to the challenges presented in the Local Plan Update
- Delivery of a significantly-increased quantum of larger 2 bed and 3 bed units over and above the Extant Consent to meet the Council's stated requirements
- Relating to the above points, enabling the Council's housing need to be more efficiently met without requirement for release of other sites, including employment land and green spaces. The proposals in this manner represent the optimal means of securing sustainable, high-quality regeneration against an undeliverable consent

- Significant attention has been given to off-site public realm to propose increased tree and shrub planting, public art and provision of multi-use spaces with a view to co-ordinating this with proposals at the Minster Quarter
- Inclusion of the concrete car park frieze within the parts of the external façade and external amenity areas
- Replication of the concrete car park frieze within balustrading and the public realm
- Alterations to the internal layouts within Block D, alongside external façade changes to provide greater contrast and separation from BSM and the tower structures. Brick detailing included to reference the Minster's flint and limestone facade.
- A sustainable design strategy taking a hierarchical approach, via maximising energy efficiency to limit operational carbon before utilising renewable energy sources and including a fabric first approach that targets U-values and an air permeability that goes beyond current regulations and incorporates mechanical ventilation with heat recovery (MVHR) to limit heat loss over the winter period. Targets for operational water use, biodiversity and construction waste streams have also been set based on industry best practice standards.

5.10. The design response is set out in greater detail within Section 7 of the Design and Access Statement. This detail has also been advertised to interested parties through static exhibitions in January 2024, held at Reading Minster and within BSM and via update to the project website – www.bsmfuture.co.uk. Appendix 3 provides detail of the exhibition boards highlighting the updated proposals.

5.11. Taking into this account, it is considered that the Proposed Development has responded positively and proactively to comments received, which have influenced and improved design and layout to provide a high-quality scheme that reflects its location, proposes appropriate materials and finishes and which brings forward one part of what will become a thriving new community in the heart of the town centre.

5.12. Discussions with the Council's Property Department remain ongoing in respect of the car park, which the Council currently operates, changes to road layouts outside of the applicant's ownership and the part-demolition and reinstatement of podium areas to enable construction of the Proposed Development. The Applicant remains committed to working positively and proactively with the Council's Property Department during the application and construction process to ensure that the proposals can be brought forward with minimal impact and maximise synergies with the adjacent Minster Quarter proposals.

6. The Proposed Development

- 6.1. This section details what is being applied for in the planning application for the Proposed Development. This Section should be read in conjunction with the Design and Access Statement, which further describes the principal components of the Proposed Development, its design approach and relation with the context and townscape.

Description of Development

- 6.2. This planning application seeks detailed planning permission for:

“Part-demolition of existing retail units, car park and service areas, demolition and rebuild of car park ramp, and construction of a residential-led, mixed-use development fronting Queens Walk and Dusseldorf Way, including all necessary enabling and alteration works required”

- 6.3. To enable the Proposed Development to come forward, it is necessary to make minor changes to the existing road layout to accommodate for the new ramp access and its amended location.

- 6.4. Offsite changes to allow for construction routes, compounds and access to building facades for demolition and construction are also necessary. In this regard, a separate detailed application is submitted for temporary works comprising:

“Part-demolition of podium deck on Dusseldorf Way and Queens Walk, amendments to existing retaining wall, excavation works and road and hardstanding re-alignment to create a temporary construction area related to proposed redevelopment works at Broad Street Mall”

- 6.5. At the time of submission, the proposed construction programme and process for the Minster Quarter is not known. As such, it is currently proposed to reinstate the offsite area demolished to enable construction of the Proposed Development upon completion of the build programme, with this detail to be agreed and subject to control via appropriately-worded planning condition.

- 6.6. The Proposed Development seeks to build upon earlier regeneration at BSM, which has included the refurbishments of Broad Street Mall and Fountain House and more recently consents to bring the former Argos corner into use to provide a cinema and leisure complex, alongside the Extant Consent and Lapsed Consent.

- 6.7. Delivery of this scheme will meet a number of strategic and local objectives, responding positively to that envisaged within the Local Plan and MQAODF, alongside the delivery of much-needed housing and regeneration of a neglected part of the town centre.

- 6.8. The Proposed Development seeks to deliver 644 one, two and three bedroom residential dwelling units (Use Class C3), together with 1,737m² (GIA) of flexible Class E floorspaces at ground floor level.

- 6.9. To serve the proposed dwellings a series of internal and external amenity spaces feature within the layout, providing access to lounge areas, co-working spaces and a gym.
- 6.10. A Management Strategy, produced by Allsop Letting and Management Agents, to explain how operations will work on site is submitted with the application.
- 6.11. The scheme makes best use of a previously developed site in a highly accessible location and takes the opportunity to create active frontages along Dusseldorf Way and Queens Walk as advocated through the MQAODF
- 6.12. A summary of the scheme proposals in relation to the Proposed Development is set out below:
- Demolition of part of BSM, including existing retail floorspaces, part of car park levels 1, 2 and 3 (rooftop) and the existing car park ramp
 - Construction of four residential buildings ranging from G+7 storeys to G+29 storeys in height, accommodating 644 dwellings, 1,737m² (GIA) of flexible Class E uses and an enhanced entrance to BSM from Dusseldorf Way/Hosier Street
 - Provision of back of house, bin and cycle storage at basement and ground floor levels
 - Provision of internal amenity areas at ground and first floor levels and external amenity areas at 1st, 2nd, 8th, 17th, 24th and 27th floor levels
 - Construction of a new car park ramp and associated amendments to ramp access arrangements
 - Amendments to car parking at 1st, 2nd and rooftop levels in order to accommodate new residential buildings and intervening first and second floor external amenity areas
 - Amendments to existing road and servicing access to BSM, including provision of new delivery bays
- 6.13. The proposed changes will necessitate existing retail and community uses located around the external facades of BSM to close, but the intent is to reprovide a similar level of floorspace, providing opportunity for new uses to come forward and overall employment, use and enjoyment of external spaces to be reinvigorated.
- 6.14. The proposed changes will also lead to a reduction in overall car parking by approximately 290 public parking spaces across the 3 levels, to a revised total of 494 spaces of which it is proposed that 100 will be allocated for private residential lease associated with the Proposed Development.
- 6.15. The proposed massing follows that envisaged by the MQAODF and the approach set by the Extant Consent with the buildings stepping down to height from west to east, reflecting

the need to provide a sensitive approach to the setting of the Reading Minster, the St. Mary's Butts/Castle Street Conservation Area and listed buildings in this area.

Landscaping and Public Realm

- 6.16. The approach to landscaping and public realm seeks to provide a comprehensive approach to enable the Proposed Development to come forward in isolation. It is recognised, however, that the public realm sits outside of BSM's ownership and is within landholdings currently identified for redevelopment as part of the Minster Quarter bid. Accordingly, our on-site proposals form part of the application but off-site public realm is shown for indicative purposes.
- 6.17. To provide certainty regarding delivery of public realm in the event that the Minster Quarter does not come forward, it is proposed that delivery of the identified areas of public realm with associated landscaping and built form detailing is subject to control via planning conditions with an appropriate sum to enable delivery subject to S106 Legal Agreement. This approach is consistent with that set by the Extant Consent.
- 6.18. A summary of proposed Landscaping and Public Realm is set out below:
- Podium landscaped areas at 1st, 2nd, 8th, 17th, 24th and 27th floor levels providing 2.033² of private amenity space, comprising:
 - Usable lawn spaces, play features, integrated furnishings, living roof, private terraces, tree and amenity planting
 - Improved public realm along Dusseldorf Way and Queens Walk, reinvigorating 3,100m² of publicly-accessible space, including:
 - Intention to retain existing trees and planting of new trees in raised planters
 - Improvements to paving to reflect 20th Century heritage of BSM and the former Civic Area
 - Free standing timber benches to support spill out and programmable event spaces
 - Integration with Hexagon, HexBox and Aparto entrance areas to provide greater legibility, use and enjoyment
- 6.19. Further detail in respect of the approach to public and private spaces is set out in the Landscape Section of the DAS.

Trees

- 6.20. There are no trees on site, all trees including those existing sit within the public realm. Whilst the landscaping proposals set out measures to significantly enhance urban greening and to increase canopy cover, discussions with the Council have identified a strong desire to retain the trees that sit to the south of the Dusseldorf Way frontage. Accordingly, a

construction methodology has been developed to consider the most practical means of achieving this, taking into account the need to part-demolish the adjacent existing BSM to allow construction of this project. Further detail in this regard is set out later in this section.

Proposed Floorspace and Residential Mix

6.21. As a consequence of the proposals to demolish part of BSM, a total of 14,424.2m² will be lost and replaced with new floorspace and uses. The area subject to demolition comprises the following:

- Retail and Community Uses
- Car Park and Ramp
- Back of house and servicing

6.22. A series of floorplans entitled 'BSM CIL Areas' have been produced to identify the floorspace subject to demolition and are submitted with this planning application. It is noted that not all floorspace subject to demolition qualifies for CIL relief. More detail in this regarding is set out in the Planning Obligations section of this document.

6.23. In place of the demolished area, the following floorspaces and uses are proposed:

- 644 Residential dwellings, 53,525m² (49,919m² accommodation, plus 1,635m² of residential amenity and 1,971m² of residential servicing)
- Flexible E class uses, 1,737m²

6.24. A schedule of existing and proposed floorspaces, taking into consideration BSM and the area associated with the Lapsed Consent which is now included within this submission, is submitted with the planning application. In terms of floorspace to be demolished, the area comprises the following floorspaces, which is set out visually within Appendix 4 of this document.

- Basement Level – 4,068m²
- Ground Floor Level – 3544m²
- First Floor – 3,389m²
- Second Floor – 2,889m²
- Roof Level – 77m²

6.25. The proposed residential mix has been amended from that set by the Extant Consent to reflect commercial realities relating to what is a complex technical project, whilst seeking to deliver more successfully against policy aspirations of the Local Plan, Policy CR6 in particular. The proposed mix and a comparison against the Extant Consent is set out overleaf:

Unit Type	Quantum	%	CR6 Split	Family Homes
Studio	69	10.71%	46.27%	
1B1P	70	10.87%		
1B2P	126	19.57%		
1B2P (W)	33	5.12%		
2B3P	52	8.07%	46.11%	
2B4P	245	38.04%		
3B5P	49	7.61%	7.61%	

Table 1: Proposed Housing Mix, broken down against Policy CR6 and % Family Homes

Displaced Tenants

- 6.26. It is recognised that existing uses in the external retail and community units on Dusseldorf Way will be lost during redevelopment of BSM; these units will be demolished and the Applicant requires vacant possession in order to progress the scheme. Discussions have been held with existing tenants for some time and a number of tenants are moving at the end of existing leases, whilst others are currently seeking alternative accommodation.
- 6.27. The Applicant is committed to working with community groups and will discuss how best to assist relocation of those businesses yet to find alternative accommodation. It is recognised that there may be opportunity to relocate within the adjacent Minster Quarter as this comes forward, but this will require negotiation with the Council or subsequent landowner and therefore cannot as yet be fully controlled.

Affordable Housing

- 6.28. The approach to affordable housing has been dictated by the desire to provide an improvement in terms of quantum, size and mix over that pertinent to the Extant Consent, whilst reflecting the commercial realities of what is a highly complex development project.
- 6.29. Further to a detailed viability review, it is currently proposed to provide 7.5% affordable housing which will respond to the proposed overall housing mix, i.e. affordable and market provision will follow the same approach with no skew towards smaller or family accommodation depending on tenure.
- 6.30. Affordable housing will be provided in a tenure-blind manner and will therefore be pepper-potted throughout the development. All homes will be constructed in line with NDSS, as per policy H5 of the Local Plan and all affordable homes will be M4(2) compliant and at least 5% of affordable units will be M4(3) compliant.
- 6.31. All residents will enjoy the same level of access to internal and external amenities within the scheme.

- 6.32. In line with Policy H4 of the Local Plan and paragraphs 4.17 – 4.19 of the Affordable Housing SPD, the affordable units within this Build to Rent scheme will be provided as Discount Market Rent and set at Local Housing Allowance (LHA) levels. It is proposed that rental levels and the management process for the affordable homes will be discussed and agreed with the Council post-submission with the management of units set out within a S106 Agreement as per policy requirements.

Transport

- 6.33. It is proposed to demolish and reprovide a car park ramp through the proposals and consequently it will be necessary to make minor amendments to existing access and egress arrangements from BSM.
- 6.34. Upon completion of the ramp construction and internal car park reconfiguration, the car parking will be accessible for public use. Access to the car park will be in the same manner as currently undertaken with access from both the A329 IDR and Castle Street.
- 6.35. Within the basement level the development proposals include a package of changes to the road layout to enable access to / from the new car park ramp.
- 6.36. The proposed changes at basement level are shown on Stantec Drawing 33211072/5500/001 Rev P01, the main changes of which can be summarised as follows:
- New entry and exit barriers proposed on the existing inbound road which would be closed.
 - Access to the MSCP ramp to/from the western edge of the site;
 - Inbound traffic from Castle Street will arrive at the basement level and use the main service road travelling north past the Hexagon with a new junction to join with the inbound traffic coming from the A329 IDR from the west.
 - Outbound cars exiting will join the service road to the north of the Hexagon doors and will be required to give-way to other cars (going to the car park) and outbound shopping centre service vehicles.
 - The proposed road layout changes in this location retains the required access to and from the service yard from the A329 IDR to the west of the site.
- 6.37. As noted earlier, the proposed development site at Broad Street Mall requires part of the existing car park and implementation of the scheme will reduce capacity by approximately 290 public parking spaces across the 3 levels, to a revised total of 494 spaces. Within the reduced car park quantum it is proposed to allocation up to 100 spaces for private residential lease associated with the residential dwellings.

- 6.38. Based on applying the standards prescribe in RBC parking guidance, the development will provide 347 cycle parking spaces for the future residents.
- 6.39. The proposed cycle parking will be consolidated in a secure store within the ground floor of Block D with easy access from Dusseldorf Way / Hosier Street. In addition, the cycle stores will have CCTV installed to increase the security. The proposed cycle parking will be provided in the form of two tier Josta style racks.
- 6.40. The existing shopping centre facilities does not provide staff cycle parking. To promote sustainable travel for staff travelling to/from the retail units 17 secure cycle parking spaces will also be provided for staff with this supported through provision of 15 new Sheffield stands (30 spaces) provided for public use within the public realm.
- 6.41. Vehicle movements at basement level will be managed through a Delivery and Service Plan (DSP), which will develop the strategy for residential and retail areas set out in Section 5.7 of the Transport Statement.
- 6.42. Servicing and refuse collection will be undertaken on-site at basement level where the communal bin stores are located within each of the blocks, save for Block D which will use facilities within the basement of adjacent Block C.

Energy and Sustainability

- 6.43. The Proposed Development will aim to achieve a high level of environmental performance to minimise its carbon footprint. This will be achieved by designing the buildings to have high standards of insulation to minimise the energy uses and using on-site renewable energy generation and low carbon technologies. The development is seeking to achieve a BREEAM Excellent rating in relation to the non-residential parts of the buildings, whilst use of photovoltaics and air source heat pumps are proposed to achieve an up to 69.3% reduction in CO² emissions with further reductions to net zero being made through contribution to the Council's Carbon Levy.

Temporary Construction Area

- 6.44. To allow the part-demolition of BSM and the construction of the Proposed Development, it will be necessary to undertake a series of enabling works, which will allow for access down to basement level along the southern elevation of BSM and for provisions for access and egress in forward gear to and from the IDR and Castle Street.
- 6.45. At ground level, Dusseldorf Way occupies land directly to the south of BSM. Part of Dusseldorf Way sits on top of made ground whilst the other part is a podium structure with a basement underneath. Where either the existing BSM basement and associated road structure abuts the made ground it has been necessary to put in place retaining structures. The figure below identifies the current on-site arrangement.

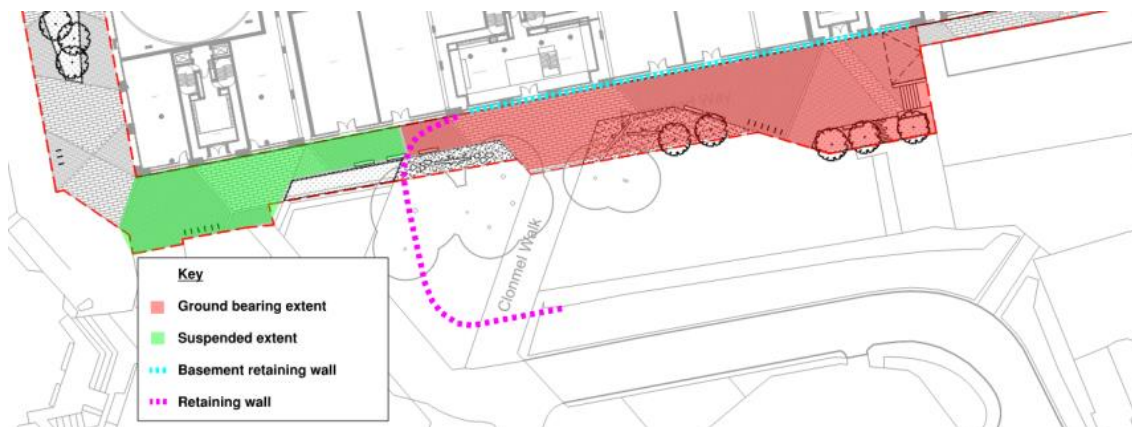


Figure 7: Current on-site arrangement of made ground, podium and retaining structures

- 6.46. To the south of Dusseldorf Way there are a number of raised planters that house relatively mature trees; possibly planted around the time of the original BSM and Civic Area development in the late 1960's and early 1970's. The Council has identified the retention of the existing trees on site as a high priority.
- 6.47. Taking the above into account, it is envisaged that ground will be excavated along Dusseldorf Way with amendments to existing retaining and provision of new retaining structures put in place to allow for a ramp to be constructed from basement to ground level. Taking into consideration tracking requirements for construction vehicles, the proposed location of the ramp and associated works is set out below. Plans, Illustrative images and a long cross section identifying how the ramp will appear and where it will be located on Dusseldorf Way are provided within Appendix 5 to assist understanding of this temporary aspect of the scheme proposals, this detail including illustrative images of proposed post-construction finishes to public realm and landscaping.

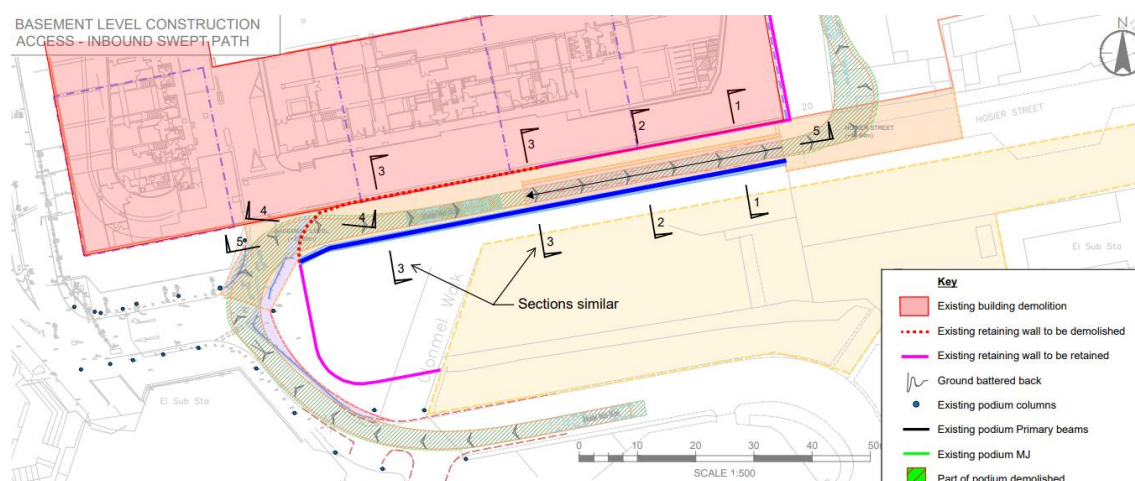


Figure 8: Proposed on-site arrangements for the Temporary Construction Area and Ramp

- 6.48. The construction methodology is set out in more detail within the Technical Note produced by Meinhardt to support the Temporary Construction Area planning application.

6.49. Following completion of construction of the new buildings, the ramp will no longer be required. Therefore, there are several engineering options that could be considered for its infill in order to reinstate Dusseldorf Way, which include:

- Backfill between the retaining wall and the Broad Street Mall basement up to the proposed level required
- Install a suspended slab spanning between the retaining wall and the Broad Street Mall basement retaining wall. This would provide vertical and lateral support to the retaining wall in the permanent condition, with a permanent void left beneath Dusseldorf Way.

6.50. The ramp location and extent have been developed sensitively with a view of retaining the existing Dusseldorf Way trees. There are several options for the proposed retaining structure and consequent making good which will need further development during the next stages of design, along with contractor input.

7. Planning Policy

- 7.1. The purpose of this Section is to identify the key national and local planning policy and guidance relevant to the determination of the planning application against which the proposals have been considered during design development. An analysis of the key policies and tests relating to the proposed development is included below.

National Planning Policy

- 7.2. National planning policy is set out in the National Planning Policy Framework (NPPF), the most recent update of which was adopted in December 2023. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 7.3. This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

- 7.4. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.5. The Development Plan for the Site comprises the Reading Local Plan, adopted November 2019.
- 7.6. There are also a number of supplementary guidance documents published by the Council which have been taken into account during the course of design development and the preparation of the planning application. Insofar as they may be considered relevant to this application is the Reading Tall Building Strategy (2008), Sustainable Design and Construction SPD (2019), Design Guide to Shopfronts (2022), Employment Skills and Training SPD (2013), Planning Obligations under Section 106 SPD (2015), Affordable Housing SPD (2021), Revised Parking Standards and Design SPD (2011), Employment and Training SPD (2013) and Minster Quarter Outline Area Development Framework (MQAODF) (2018).

Emerging Policy

- 7.7. The Council agreed in March 2023 to undertake a partial review of its adopted Local Plan (2019), following the publication of the NPPF 2021 which superseded the 2019 development plan. The 2021 revision of the NPPF included updates in relation to local

housing needs and updates to the standard methodology for calculating housing needs, pertinent to urban centres including Reading that have been retained in the latest December 2023 update.

- 7.8. The number of homes to be provided is the most significant question that the Partial Update must address, and the main reason that an update is required. The standard methodology introduced by the NPPF 2021 placed a 35% uplift for the authorities that cover the main parts of the 20 largest urban areas in England, including Reading, which means that the housing need is increased by 35%. The Council considers that a lower figure of between 735 and 800 homes per year is more appropriate based on an ongoing Housing Needs Assessment and review of site capacity in the Borough. This still represents a significant uplift over the figure of 689 dwellings per annum identified in the Local Plan 2019, which did not account for unmet need of 230 dwellings across the plan period.
- 7.9. Meeting an annual provision figure of 800 dwellings per year would mean identifying sites for an additional approximately 1,700 dwellings, either on new sites or by changes to capacity of existing identified sites. As part of the LPU, the Council is currently proposing that *'the housing provision figure in H1 be amended to reflect available capacity to 2041, expected to be in the region of 800 homes per year for a total of around 14,400 homes, but to be refined through more detailed capacity work'*.
- 7.10. In addition to an increase in the number of new homes required within the Borough over the plan period, the Council has recognised need to provide larger-sized accommodation. It has been found that that the policy as it stands is not delivering the size of accommodation needed and that *'based on the needs identified in the Strategic Housing Market Assessment, Reading needed 3,558 new homes of three or more bedrooms between 2013 and 2023, but actually delivered 1,125, only around a third of the need, despite overall housing delivery broadly in line with identified needs'*. Changes to Policy H2 seeks to increase delivery of 3+ bedrooms within the Borough, primarily outside of the town centre area in which BSM is located, but it is also proposed to increase provision in this area.
- 7.11. The Council's review has also identified the need to update the Local Plan site allocation relating to the site (Policy CR12: West Side Major Opportunity Area) in line with national and local policy changes. In terms of amount of development delivered and committed, the review states that *'progress on achieving the level of development outlined in the policy has been reasonable and the policy does not require revision for this reason'*.
- 7.12. In reference to the site allocations of policy CR12, the review states that where planning permissions have already been granted on the sites covered by Policy CR12 (CR12d Broad Street Mall), *'It is considered that allocations should not necessarily be removed where permissions have been granted in case alternative applications are made. There may be a need to amend the allocation to reflect what has been permitted'*.
- 7.13. The review concludes: *'Policy CR12 should be subject to update due to:*

- *Changes to the circumstances on individual sites, including the progress of development and the award of funds for the Hexagon; and*
- *Potential impacts of changing national policy, including on matters such as increasing densities in town centres’.*

Site Designations

7.14. The Site is subject to the following designations, as defined in the Reading Local Plan 2019:

- Within the Borough Boundary;
- Within Central Reading;
- Within the Central Core, Office Core and Primary Shopping Area
- Borough Boundary
- Within the West Side Major Opportunity Area (Site CR12d, Broad Street Mall);
- Within the Tall Buildings Cluster (CR10b, Western Grouping);
- Within an Air Quality Management Area (AQMA).



Figure 9 – Local Plan 2019 Extract identifying the site context

7.15. A more detailed plan and key to support the Local Plan map for the town centre area is included within Appendix 6 of this document.

Minster Quarter

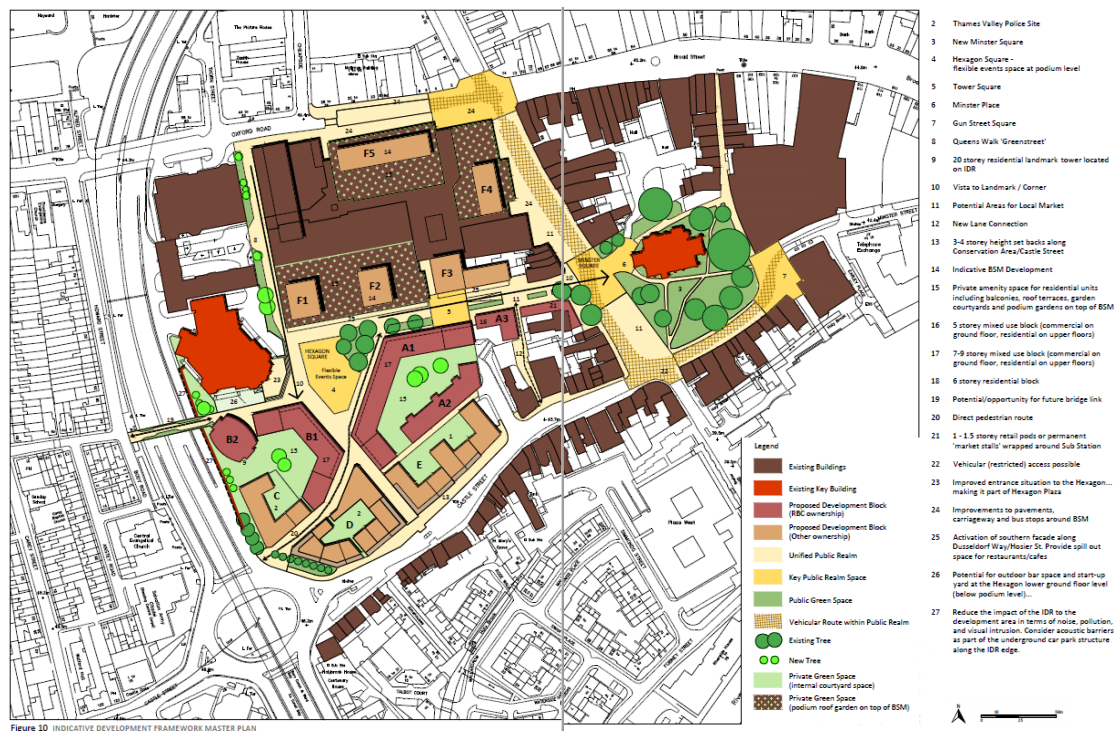
7.16. The MQAODF identifies Hosier Street/Broad Street Mall as an area that provides significant development opportunity for a major mixed use development in Central Reading. The area

will host a wide range of uses and activities that will contribute to an active, well designed public realm throughout daylight and evening hours. There will be a mix of residential/office/commercial/retail and leisure/community facilities.

7.17. The MQAODF further states that ‘a development which retains the existing mall with additional development above may be appropriate where it improves the quality of the existing mall frontages’. The extract overleaf shows the indicative masterplan upon which the SPD is based and how it is envisaged that development at BSM will be brought forward.

7.18. The aims of the SPD are to achieve a high-quality public realm with new public squares and spaces with an emphasis on cultural enhancement in relation to the Hexagon Theatre bringing further greening to this part of the town centre. Dusseldorf Way and Hosier Street are intended to become a key pedestrian street linking the Hexagon Theatre and the Minster.

7.19. The applicant is aware of emerging proposals at the Minster Quarter and is committed to bringing forward a scheme that enables the Council's aspirations to come forward concurrently with that envisaged at BSM. Potential synergies around *inter alia* construction logistics, energy, public realm may be able to be realised and McLaren is committed to discussing matters with the Council, but also recognises that should a competitive situation arise with the Council's preferred bidder that it may not be possible to fully achieve aspirations.



7.20. The future vision of the wider locality, the masterplan for which is set out above, is highly pertinent to decision-making at BSM. The proposals at BSM form part of the Council's

ambitions for the wider area, but importantly sit centrally within the Minster Quarter with new development identified for Minster Quarter Central and the Thames Valley Police Headquarters sitting in the foreground when viewed from the St. Mary's Butts and Castle Street and Russell Street and Castle Hill Conservation Areas.

- 7.21. Illustrative images showing the future development scenario within the town centre are included in the DAS and HTVIA documents. The planning assessment also considers this scenario as it acknowledges the town's direction of travel, as set through the Local Plan and supporting policy documents.
- 7.22. Whilst the illustrative images cannot accurately define the exact nature and extent of development that will come forward at the Minster Quarter and Thames Valley Police HQ, the MQAODF nevertheless provides expected parameters which have guided development at BSM and in turn will guide development within the wider locality. It is understood that detailed proposals have been prepared for both adjacent developments that will allow further assessment to be undertaken should this detail come forward during the determination process.

8. Planning Assessment

8.1. This Section sets out our assessment of the Proposed Development against relevant planning policy and in particular how this complies with planning policy in respect of the following matters:

- Principle of Proposed Development
- Land Use
- Design and Materiality
- Heritage and Townscape
- Residential Standards
- Residential Density
- Affordable Housing
- Private Amenity and Public Realm
- Transport and Servicing
- Energy and Sustainability
- Temporary Construction Area and
- Environmental Considerations.

8.2. Comparison to the Extant Consent will be used where appropriate to set out the clear improvements offered by the Proposed Development and to set out the case for approval in context of planning policy and relevant material considerations.

Principle of Proposed Development

8.3. The Proposed Development is for residential-led mixed-use development, comprising 644 residential units, supported by internal residential amenity spaces and 1,737m² (GIA) of flexible Class E uses that will be accessed direct from Dusseldorf Way.

8.4. The site is previously-developed land, situated centrally within Reading in a location identified within the Local Plan for change and improvement and therefore represents sustainable development that can meet the Council's stated aspirations for the site and act as a kick-starter for the wider regeneration of the MQAODF area of which it forms part.

8.5. The NPPF (2023) states that *'at the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking...'* it goes on to state *'all plans should be based upon and contain the presumption in favour of sustainable development as their starting point, with clear priorities that will guide how presumption should be applied locally'*.

- 8.6. Local Plan Policy states that a positive approach to considering development proposals will be taken that reflects that of the NPPF and *'where appropriate will work proactively with applicants jointly to find solutions which means that proposals can be approved wherever possible'*. In this regard, significant engagement has been held with the Council at pre-application stage to identify proposed changes to the scheme, taking into consideration technical and commercial constraints to bringing forward the Extant Consent and to replace the area subject to the Lapsed Consent with appropriate development that accords with ambitions for the West Side Major Opportunity Area, which identifies the Site as an appropriate location for retail, leisure and residential uses.
- 8.7. Redevelopment of the Site will result in a substantial amount of new residential accommodation of high quality design, located in a highly accessible location. The Proposed Development would contribute to meeting the housing targets by adding 644 new 1, 2 and 3 bed residential units to the existing housing stock.
- 8.8. The additional housing proposed over and above that attributed to the Extant Consent will significantly assist the Council in terms of meeting the increased housing need it is seeking to deliver upon through the Local Plan Update and represents a logical and pragmatic way to achieve this; the Council recognises that it will need to accept higher density development and the Proposed Development represents an improvement over the Extant Consent by providing residential uses down to ground level and via additional height, whilst removing the separate affordable block from the Oxford Road frontage, which was one of the earlier schemes less successful features. The Proposed Development will deliver policy-compliant units in terms of size and accessibility and the proposals also represent an improvement in terms of delivery against required mix, with the scheme proposing a significant increase in both 2B4P and 3B5P units, which also meets the Council's stated aspirations in respect of emerging Policy H2.
- 8.9. The Proposed Development will introduce a significant increase in shop frontage onto Dusseldorf Way, alongside residential lobbies and internal amenity areas. This will increase passive surveillance of the locality and introduce activity and vibrancy to this key route between the Reading Minster and the Hexagon, in turn encouraging greater use of these facilities and working towards the aspirations of the MQAODF. It is therefore evidence that the proposed ground floor uses are inherently appropriate for this established town centre location.
- 8.10. For the reasons above, the principle of the Proposed Development is in accordance with planning policy. The proposals are also in accordance with the Government's overarching objectives for sustainable growth and will act as a catalyst to the regeneration of the wider area.

Land Use

Residential Use

- 8.11. The NPPF (Paragraph 60) sets out the Government's objective of *'significantly boosting the supply of homes'*. Paragraph 120 states in part that decisions should *'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example building on or above car parks)'*.
- 8.12. Local Plan Policy H1 states that provision will be made for at least an additional 15,847 homes in Reading Borough over the plan period with the Local Plan Update seeking an uplift of c. 110 homes per annum on top of this to respond to changes in calculating housing need at the national level.
- 8.13. The Site falls within the West Site Major Opportunity Area, Local Plan Policy CR12d, which identifies the Site as an appropriate location for retail, leisure and residential uses.
- 8.14. The MQAODF further supports residential development at Broad Street Mall.
- 8.15. Planning policies at both national and local level encourage the effective use of previously developed land. The Proposed Development would accord with this objective and make a valuable contribution to the regeneration within Reading.
- 8.16. In accordance with the NPPF and Local Plan, the Proposed Development will deliver 644 high-quality residential dwellings in Central Reading, contributing towards the Council's housing stock in a highly accessible location. As such, it is considered that the principle of residential development is acceptable, and delivery of housing on the Site should be encouraged.

Non-Residential Uses

- 8.17. At a national level, the NPPF sets out the Government's commitment to securing economic growth in order to create jobs. The planning system should encourage and not act as an impediment to sustainable growth, and local authorities should plan proactively to meet the development needs of business. Planning policies should be positive and promote competitive town centre environments and set out policies for management and growth of centres, including allocating a range of sites to meet needs for retail, leisure and other uses in full.
- 8.18. Local Plan Policy CR7 requires uses on the ground floor along designated primary frontages to be within the following use classes: A1, A2, A3, A4, A5 (now within Class E), C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors
- 8.19. The MQAODF further suggests that the Council supports continued additional retail provision, with emphasis on restaurants located around the edges of the Mall, taking advantage of new public realm and open space.

- 8.20. It is evident that the proposed ground floor uses will achieve the above policy ambitions. By demolishing and constructing new buildings it has been possible to create additional and improved retail frontage which will line the key route between Reading Minster and The Hexagon, adding vibrance, surveillance and an improved 24/7 offer that will attract additional footfall to the locality. The proposals will help underpin the applicant's vision for BSM, complementing the recent internal refurbishments and new planning permissions for leisure use, enhancing the attractiveness of the shopping centre and bringing new residents into the town centre in the process.
- 8.21. Taking this into consideration, the Proposed Development is inherently appropriate for this established town centre, brownfield and sustainable location and will contribute towards maintaining and enhancing its vitality, viability and competitiveness. It is therefore considered that the proposed flexible retail land uses is in accordance with the planning objectives of the NPPF and Reading Borough Council Local Plan.

Design and Materiality

- 8.22. Paragraphs 126 and 129 within the NPPF state that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 8.23. Local Plan Policy CC7 states that all developments must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 8.24. Local Plan Policy CR10b states that a small number of tall buildings would be appropriate to create a distinctive grouping to mark the area as the civic heart of Reading and gateway to the centre. Tall buildings within the Western Grouping are required to be subservient to the Station Area Cluster and be generally lower in height than the tallest buildings planned for the Station Area Cluster.
- 8.25. The MQAODF Section 5.2 states in part that *'the master plan has been based on the principle of accommodating 3-4 tall buildings on site, one of which falls on the former civic site, whilst the remaining 3 form new towers on the BSM upper podium level'*.
- 8.26. As set out in Sections 4 and 5 of this document and the Design and Access Statement, significant work has been undertaken further to engagement with the Council, D:SE, local representative groups and local residents and businesses to firstly make the case for necessary design changes to the Extant Consent and then to respond positively to address queries raised about various aspects of the scheme.

- 8.27. In particular, significant work has gone into developing a scheme of high build quality, with materials and a design philosophy that reflects the site's recent heritage and wider history of Reading. The resultant proposals recognise the existing 20th Century heritage, traditional Reading materiality and vernacular and provide a much-improved façade and overall appearance that will vastly enhance this part of Reading in line with policy aspirations.
- 8.28. In response to feedback received, the design has been revised both externally and internally. Blocks A to C have been amended to provide more architectural detailing to ensure that the facades are more visually interesting with a clear definition of base, middle and top. Balconies have been added to the west and southern elevations to break up the façade and to provide more amenity spaces. Changes have been made to the rhythm of horizontal banding to accentuate verticality of the towers with additional height and lightening of the façade towards the top of the structure to assist with the appearance of slenderness.
- 8.29. Block D has been amended to provide a distinct structure with a separate architectural language that reflects its positioning closer to the Reading Minster. Internal changes have also been made to improve the layout to resolve concerns regarding usability of certain dwellings.
- 8.30. Externally, amendments have been made on facades and in the public realm to reflect the 20th Century heritage of the area and to re-use parts of the existing concrete frieze where possible. This will be implemented alongside significant urban greening and modern architecture, street paving and furniture which together provide a well-considered, consistent architectural language across the scheme which results in a successful addition to Reading's townscape.
- 8.31. It is considered that the use of traditional, heavier weight materials and building from basement level up provides for the comprehensive regeneration of the area that is required and provides a design approach that is more ambitious and of significantly greater quality than that related to the Extant Consent.
- 8.32. The proposed height and massing has been influenced by the Site's accessible location within the Town Centre in addition to adopted policy which permits 3-4 tall buildings within this location. Whilst the Proposed Development is taller than 20 storeys, it sits below the maximum height of the revised consented schemes at Station Hill which provide for a 163m AOD.
- 8.33. In addition, the use of additional height needs to be considered in context of developments coming forward within the town centre, including Station Hill and the Minster Quarter. Many of the Minster Quarter buildings will be viewed in the foreground of the BSM proposals, which occupy a central position in the wider MQAODF area, thereby providing greater distance and buffer from key buildings and locations and allowing for further height.

- 8.34. The height proposed also enables the Proposed Development to work more efficiently, responding to the additional housing need and changes to housing mix identified in the Local Plan Update. In this regard, the Proposed Development creates significant benefits over and above that envisaged within the Local Plan and MQAODF.
- 8.35. Finally, the design response reflects a number of policy and legislative changes put in place further to grant of the Extant Consent. These changes have rendered the Extant Consent undeliverable necessitating many of the design and layout revisions proposed in this instance.
- 8.36. Overall the Proposed Development design marks a significant improvement to the Extant Consent. The Proposed Development optimises the development potential of the Site, whilst substantially enhancing the existing local character and street scene in doing so paving the way for the Minster Quarter to come forward.
- 8.37. It is clear that the Proposed Development is in accordance with the NPPF and, given recent consents at Station Hill also remains in line with the ambitions of Local Plan Policy CR10b. In addition, the architectural approach and use of better, high-quality materials that are reflective of the Reading vernacular ensure that the proposal accords with Local Plan Policy CC7 and is therefore considered acceptable in design terms.

Heritage and Townscape

- 8.38. Chapter 16 of the NPPF deals with Heritage Assets describing them as an irreplaceable resource that should be conserved in a manner appropriate to their significance.
- 8.39. Local Plan Policy EN1 notes that historic features and areas of historic importance and other elements of the historic environment, including their setting, will be protected and where appropriate enhanced.
- 8.40. Local Plan Policy EN6 requires new development to make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities.
- 8.41. An assessment of the impact of the Proposed Development on local and strategic heritage assets is provided in the accompanying Heritage, Townscape and Visual Impact Assessment.
- 8.42. As set out in the HTVIA, the Proposed Development has full regard for the character and appearance of the area of Reading in which it is located, alongside policy ambitions for the site and the wider locality and this is reflected in the form, scale and materials used to animate the proposed buildings.
- 8.43. The height and scale of the proposed buildings are considered appropriate for this location. The buildings are sufficiently sympathetic to the neighbouring buildings, whilst also responding to the emerging context of taller buildings in the vicinity.

- 8.44. The Proposed Development is consistent with the emerging context of buildings of a greater height in the MQAODF area and West Side Opportunity Area.
- 8.45. The proposed massing is well articulated and it will have a positive relationship with the adjacent buildings, providing a kick-start for wider regeneration, whilst supporting the Hexagon and responding sufficiently sensitively to the Reading Minster.
- 8.46. The Proposed Development will contribute to the enhancement of Hosier Street and Dusseldorf Way, in terms of providing active frontages and enhanced urban frontage in close proximity to St Mary's Butts, further creating a safe and accessible environment and improving legibility to this currently neglected part of the town centre.
- 8.47. The Proposed Development also aims to make a positive contribution to the existing historic townscape by helping to reactivate Hosier Street/Dusseldorf Way, both in terms of the activity within the building but also improving the street and providing a much more positive view from St Mary's Butts and helping to promote and improve access and connectivity.
- 8.48. The extent of development visible from Reading Minster is highly comparable to that allowed through the Extant Consent, whilst views from Castle Street and the Baker Street Conservation Area will be viewed in context of the emerging Minster Quarter proposals which will sit in the foreground. The location is within the town centre and in an area identified for tall buildings and regeneration. As such, the proposals are consistent with the Council's policy ambitions, whilst also providing enhanced benefit through delivery of more housing in line with that envisaged by the Local Plan Update and provision of a higher quality architectural response.
- 8.49. It is therefore considered that the Proposed Development is in accordance with the NPPF and adopted Local Plan Policies EN1 and EN6 and is therefore considered acceptable in heritage and archaeology terms.

Residential Standards

- 8.50. Local Plan Policy H5 states that new build housing should be built to the following standards:
- All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standards;
 - All new build housing will be accessible and adaptable in line with M4(2) of the Building regulations where it is viable, unless it is building in line with M4(3).
 - On developments over 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations.
- 8.51. Local Plan Policy CR6 states that all proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the

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

- 8.52. Section 5.1 of the MQAODF notes that as a guide, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed.
- 8.53. The Proposed Development seeks to provide 644 units comprising 299 (46%) 1 beds, 296 (46%) 2 beds and 49 (8%) 3 beds across the Site. Within this, the scheme will also deliver 5% of the dwellings as wheelchair accessible (M4(3)) in accordance with Policy H5.
- 8.54. Although policy indicates that new build housing within Central Reading are not required to meet nationally-described space standards, it is recognised from pre-application discussions and adopted and emerging policy that the Council seeks best practice and accordingly all units have been provided to meet this criteria, representing a significant increase in the quality of spaces that will be enjoyed by residents over that associated with the Extant Consent.
- 8.55. In addition, the ability to develop down to ground floor and basement levels enables much more meaningful, bespoke residential amenity area to be provided. Internal amenity will provide spaces for socialising, working and exercising. External amenity is located closer to dwellings and is better located in terms of interaction with the adjacent public realm, helping to improve surveillance and complementing the improvements on the Dusseldorf Way and Hosier Street frontage.
- 8.56. Taking the above into account, it is evident that the Proposed Development provides an excellent standard of residential accommodation for all tenures, in accordance with relevant national and local standards, specifically Local Plan Policies H5, and CR6.

Residential Density

- 8.57. Local Plan Policy H2 notes that the appropriate residential densities will be informed by a number of factor, including: accessibility, effective use of land and the character and mix of uses in the area. An indicative density for the Town Centre as set out in Policy H2 is above 100 dwellings per ha (dpa), although the Local Plan Update is considering increasing this figure to 200 dpa, citing average delivery of 334 dpa over the period 2013 – 2023.
- 8.58. The scheme proposes a total of 644 dwellings and has a site area of 0.62ha, resulting in a residential density of 1,039 dpa. When compared against the Extant Consent which had a density of 184 dpa, the change in density figure appears significant, this however is on account of the terms of measurement used. The Extant Consent was measured against the whole site area of BSM at 2.42ha, producing a density of 184 dpa against 446 dwellings proposed. If measured on the same basis, the Proposed Development would result in a

density of 266 dpa, which is within the average delivery parameters in the town centre over the past decade.

- 8.59. It is considered that the Proposed Development optimises the development potential of previously developed land in an area of Reading where land is at a premium, whilst delivering a scheme of exceptional architectural quality, providing 644 much needed residential units towards RBC's housing stock and in a manner that better targets policy requirements in terms of housing need and required mix. The proposals further reflect envisaged changes in terms of Local Plan policy, which seek higher densities and improvements in unit size. As such, the scheme is considered acceptable in density terms.

Affordable Housing

- 8.60. Paragraph 63 within the NPPF states where LPAs have identified that affordable housing is needed, they ought to set policies for meeting this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 8.61. Local Plan Policy H3 requires 30% of the total dwellings be in the form affordable housing on sites of 10 or more dwellings and also notes that in all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken.
- 8.62. The Proposed Development is accompanied by a Financial Viability Assessment (FVA), prepared by DS2, which is submitted as a standalone report. The FVA demonstrates that the scheme will deliver the maximum reasonable amount of affordable housing. The proposed provision is set at 7.5% of the total quantum of units to enable a balanced provision of affordable units to come forward within the confines of the scheme viability.
- 8.63. This offer represents between c.49 new affordable homes to be constructed as part of the development on-site, which will be delivered as Discount Market Rent at LHA levels and secured by S106 Legal Agreement. The FVA will be the subject of an independent third party review on behalf of the Council as part of the determination process.
- 8.64. For the reasons provided above, the proposed affordable housing offer represents the maximum reasonable amount that can be delivered by the development and represents an improvement over that proposed by the Extant Consent in terms of delivery of a tenure-blind scheme providing access to increased and improved internal and external amenity spaces, larger unit sizes, NDSS compliant units and a higher proportion of large 2 bed and family homes. The Proposed Development is therefore in accordance with the NPPF and Local Plan Policies, H2, H3 and H4.

Private Amenity, Public Realm and Open Space

- 8.65. The NPPF at paragraph 127 sets an aim to ensure that developments incorporate green and other public spaces as part of the development.
- 8.66. Local Plan Policy EN9 states that all new development should make provision for appropriate open space based on the needs of the development. This can be achieved through on or off-site provision, contributions towards provision or improvement of existing leisure or recreational facilities.
- 8.67. Local Plan Policy H10 indicates that in the past the council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guidance for proposals:
- For Flats outside Central Reading
 - 1 and 2 bedrooms: 25 sqm per flat
 - 3 or more bedrooms: 40 sqm per flat
- 8.68. Developments in Central Reading will not always be expected to comply with standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.
- 8.69. As set out in the landscape section of the DAS, the Proposed Development will deliver a range of private, communal amenity spaces both internally and across Blocks A – D at 1st, 2nd, 8th, 17th, 24th and 27th floor levels. The external amenity spaces include a range of hard and soft landscaping and informal children's play spaces.
- 8.70. The Proposed Development also seeks to deliver improvements to the adjacent public realm. As the Minster Quarter is being brought forward, the Council has requested that the proposals for the public realm are not included within our red line but are showed for indicative purposes and controlled via planning conditions and S106 Legal Agreement so that they can be brought forward should adjacent development not come forward as envisaged. The public realm identifies significant urban greening, intended retention of existing trees, provision of street furniture and public art; the latter of which will also be secured by separation planning obligation. The proposed design philosophy reflects discussions with local residents and stakeholder groups and D:SE, allowing for capture of 20th Century heritage alongside recognition of Reading's historic twinning link with Dusseldorf.
- 8.71. The proposed public realm works will significantly improve the appearance of the Proposed Development and surrounding area, assisting with the wider regeneration vision for the West Side Opportunity Area. The works will add to the improved street frontage to create a welcoming, vibrant and well-used location that will help serve as a link between the Hexagon and the town centre.

- 8.72. In respect of Open Space, the landscape section of the DAS notes the dearth of green areas within 5 minutes' walk of the site. Existing public realm is significantly hardscaped with greening and canopy cover sparse. In addition, opportunities for localised play are equally scarce. The proposals in this manner will help introduce much needed landscaping, greening, additional tree cover and biodiversity net gain into the locality with localised play available for residents of the development.
- 8.73. It is considered that the public realm, whether delivered as envisaged in this application or as a contribution towards wider improvements associated with the Minster Quarter development, will help rejuvenate what is largely a neglected urban area that suffers from lack of greening and usable open space. The proposals enable vast improvement and lay the foundations for area-wide improvements that will address the current lack of open space.
- 8.74. Given the significant public realm and landscape improvements along Dusseldorf Way, Hosier Street and Queens Walk and the introduction of significant internal and external amenity spaces, allowing for year round benefit, in line with supporting paragraph 4.2.33 of the Reading Borough Local Plan, it is considered that the Proposed Development meets the requirement for the provision of open space that meets the needs of the residents/occupiers of the development and which also contributes to the environmental improvement of the immediate locality. In this regard, it is contended that the Proposed Development is in accordance with Local Plan Policies EN9 and H10.

Transport and Servicing

- 8.75. At a national level, the NPPF states that development should take opportunity to promote walking, cycling and public transport use (see Paragraph 104).
- 8.76. Local Plan Policy TR1 states that planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through the provision to encourage walking, cycling, and the use of public transport.
- 8.77. Local Plan Policy TR5 notes that developments should provide car and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 8.78. Local Plan Policy CC5 requires developments to include adequate, well-designed space to facilitate waste storage, refuse, recycling and composting.
- 8.79. A Transport Assessment, prepared by Stantec accompanies this application and is supported by a Travel Plan. The Transport Assessment demonstrates the acceptability of the Proposed Development in respect of the effect of the proposals on the local highway network, specifically in relation to the approach to car parking, deliveries and servicing.

- 8.80. The Site contains an existing multi-storey car park which comprises 784 car parking spaces, spread across three floors. The car park is publicly accessible and operates 24 hour, seven days a week.

Car Parking

- 8.81. RBC's Revised Parking Standards and Design SPD (October 2011) provides the residential car parking requirements for Reading. In Zone 1, the SPD suggests 0.5 space for 1-2 bed dwellings and 1 space for 3+ bed dwellings.
- 8.82. As set out above, given the accessibility of the Site, up to 100 spaces are sought for use by residents of the new scheme. This will include the appropriate provision of 33 accessible spaces to accord with M4(3) proposed within the buildings.
- 8.83. As the works necessitate part-demolition of BSM to allow a deliverable construction solution to come forward, it will be necessary to reduce car parking on-site from 784 spaces by c. 290 spaces to 494 spaces, of which 100 are proposed to be allocated to the development.
- 8.84. Stantec has undertaken a parking capacity assessment that identifies that the reduced car park at BSM can accommodate much of the existing demand, but that at peak times some parking demand would need to be met by other existing car parking facilities. The parking capacity assessment has identified that other facilities within the wider Reading town centre have surplus capacity to accommodate any overspill parking from BSM. In addition, BSM is highly accessible by a range of more sustainable travel modes including walking, cycling and public transport.

Cycle Parking

- 8.85. RBC's Revised Parking Standards and Design SPD (October 2011) provides the residential cycle parking requirements for Reading. 0.5 cycle parking spaces are required for 1-2 bed dwellings and 1 space for 3+ dwellings.
- 8.86. Based on applying the standards prescribe in RBC parking guidance, as set out in Table 5.2 of the Transport Assessment, the development will provide 347 cycle parking spaces for the future residents.
- 8.87. The proposed cycle parking will be consolidated in a secure store within the ground floor of Block D with easy access from Dusseldorf Way / Hosier Street. In addition, the cycle stores will have CCTV installed to increase the security. The proposed cycle parking will be provided in the form of two tier Josta style racks.
- 8.88. The existing shopping centre facilities does not provide staff cycle parking. To promote sustainable travel for staff travelling to/from the retail units secure cycle parking will also be provided for staff.
- 8.89. Based on 'A1 Non-Food Retail Over 1,000m²', RBC cycle standards require:

- 1 space per 6 staff; plus
- 1 space per 300m²

8.90. The number of staff at this stage is unknown, therefore using an employment density of 1 per 20sqm (Employment Density Guide 2015) this would equate to 75 employees of which would require 12 cycle parking spaces. In addition there would also need to be a further 5 spaces, based on 1 space per 300m², totalling 17 spaces for the non-residential development proposals.

8.91. Further to the cycle parking proposed for future residents and staff, as part of the public realm package of works on Dusseldorf Way and Queens Walk there will be 15 new Sheffield stands (30 spaces) provided for public use.

Servicing

8.92. In accordance with RBC Local Plan Policy CC5, the Proposed Development includes adequate space in the basements of each of the blocks for refuse facilities as detailed in the Design and Access Statement submitted in support of the planning application.

8.93. Part-demolition of BSM has necessitated a number of changes to existing arrangements at basement level and it is proposed that the service yard area will be re-purposed to provide dedicated loading and storage areas for the residential and retail proposals.

8.94. Proposed access to the service yard will be carried out as per the existing access arrangements via the A329 IDR to the west of the site and through the internal service yard control barriers.

8.95. Access to the new loading bays can be completed using existing internal service access which is a one-way loop access that will be shared between BSM and vehicles generated by the Proposed Development.

8.96. Figure 5.2 in the Transport Assessment identifies the proposed service and delivery access routes in the basement level.

8.97. The proposals for both the retail and residential servicing are set out in Section 5.7 of the Transport Assessment and identify locations of loading bays and delineation of spaces. The proposals have been tracked using 11.2m refuse and 10m HGV vehicles, as detailed in drawing numbers 332110742/5500/002 Rev P01 and 332110742/5500/003 Rev P01 in the Transport Assessment.

8.98. To encourage sustainable practice, residents will be encouraged to consider the use of services such as Click and Collect and local collection points when ordering goods for home delivery. This will be achieved through promoting the benefits of Click and Collect within the Travel Information Pack that is distributed to the new residents as part of the Residential

Travel Plan. The pack will contain information of the available goods collection points such as Amazon Locker and InPost parcel lockers.

- 8.99. Click and Collect and local collection points provide an alternative to having deliveries sent to individual home addresses. This can help reduce the number of missed deliveries (particularly during the day) and subsequently reduce delivery vehicle trips.
- 8.100. Where residents require an extended period of set-down time for deliveries that require extended periods of time such as when moving home or receiving bulky goods, the resident should inform the estates management team so that the service yard can be booked for use.
- 8.101. In addition, this the use of the basement service yard, within the Car Park Level 1 of the MSCP an area has been secured adjacent to the northern building edge that will provide space for a car or small van to use for loading/unloading and will have direct access into Level 1 of Building B.
- 8.102. Taking into consideration the approach to provision of sustainable parking, encouragement of sustainable modes of transport and the considered, effective management of deliveries and servicing, it is considered that the Proposed Development is in accordance with the NPPF and adopted Local Plan Policy CC5 and is therefore considered acceptable in transport and servicing terms.

Energy and Sustainability

- 8.103. Paragraph 154 of the NPPF states that local authorities should approve applications if its impacts are (or can be made) acceptable. In accordance with Paragraph 154 of the NPPF, the Proposed Development takes into account layout and massing to minimise energy consumption.
- 8.104. Local Plan Policy H5 indicates that all major new build housing should be built be designed to achieve zero carbon homes, unless it can be clearly demonstrated that this would render a development unviable.
- 8.105. Local Plan Policy CC4 states that in meeting the sustainability requirements of this plan, developments of more than 20 dwellings and/or non-residential development over 1,000 sqm 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.
- 8.106. Local Plan Policy CC3, notes that all developments will demonstrate how they have been designed to incorporate measures to adapt climate change.
- 8.107. Sustainability and environmental performance are integral to the Development's design and the Proposed Development responds to a number of key sustainability objectives.

8.108. An Energy Statement has been prepared by Hoare Lea and is submitted in support of the amended planning application. The Energy Statement makes use of the 'Be Lean, Be Clean, Be Green' energy hierarchy. In relation to the Proposed Development, it is demonstrated that the design proposals, with a contribution achieves zero carbon.

8.109. A range of sustainability design measures have been incorporated into the Development. This will be achieved by designing the buildings to have high standards of insulation to minimise the energy uses and using low carbon technologies.

8.110. The Proposed Development is therefore considered to be in accordance with the NPPF and adopted Local Plan Policies CC3 and CC4.

Temporary Construction Area

8.111. It is recognised by the Council that to allow BSM to be constructed in a commercial and efficient manner that works outside the red line area will be required.

8.112. The proposals for external demolition of the podium around the southern and western edges of BSM (adjacent to the demolition area) and the construction of a ramped access for construction traffic along Dusseldorf Way represent the most efficient means of constructing BSM in isolation, although it is recognised that discussions will be needed with the Council or adjacent landowner further to completion of the Minster Quarter tender process to determine how to include proposals for this area and The Hexbox proposals.

8.113. Very significant due diligence to support the Construction and Environmental Management Plan (CEMP) has been undertaken at this stage, rather than seeking to submit detail post-consent as part of planning conditions. This decision has been made to ensure that the Council and adjacent landowners can understand the proposed approach to help determine how a wider site approach to utilise BSM's approach as a 'trailblazer' for the regeneration of MQAODF to best effect.

8.114. The Applicant has undertaken a number of discussions with adjacent stakeholders and remains committed to continuing these throughout the planning application process and beyond. It is proposed that post-submission discussions will continue to enable agreement on details relating to *inter alia*:

- Location of compounds
- Proposed development phasing
- Party wall matters
- Appropriate, high-quality reinstatement of podium areas removed to enable construction of BSM
- Oversailing and retaining wall details

8.115. It is considered that the detail of all matters will take some time to discuss and agree, given the complexity of property and regeneration issues relating to other development interests in the MQAODF. As such, it is proposed to control matters through S106 Agreement and planning conditions to provide the requisite reassurance and control within the planning process.

8.116. Taking the current position of discussions regarding the future of Minster Quarter Central into consideration, it is deemed that the proposals for the Temporary Construction Area represent a technically and commercially viable means of progressing the complex demolition of part of the existing shopping centre and construction of the proposed residential-led development in place of this. The submitted detail identifies the extent of development, which will be made good upon completion of the building programme to ensure that public realm and landscaping can be reinstated to agreed standards (whether in line with the proposals here or later proposals associated with Minster Quarter Central).

Environmental Considerations

Air Quality

8.117. Paragraph 186 of the NPPF further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).

8.118. Local Plan Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.

8.119. The effect of the Proposed Development on air quality has been assessed at a number of sensitive locations around the Site. The Air Quality Assessment contained within the Environmental Statement concludes that construction works have the potential to create dust and the relevant mitigation measures should therefore be put in place. It is not considered that the Proposed Development including the cumulative effects with committed developments will have a significant impact with regards to air quality.

8.120. For the reasons above, the Proposed Development accords with the NPPF paragraph 186 and Local Plan Policy EN15.

Archaeology

8.121. The Site does not contain any nationally significant relevant designated heritage assets, or any relevant known undesignated heritage assets. The Site, including the Temporary Construction Area, is located immediately adjacent to an Archaeological Priority Area and Local Plan Policy EN2 requires the assessment of the archaeological impacts of development proposals to be submitted as part of the planning application submission.

8.122. The accompanying Archaeological Report contained with the Environmental Assessment concludes that there is low probability of archaeological remains within the area of assessment.

8.123. Given the above, and subject to appropriately worded planning conditions, the Proposed Development is consistent with the guidance set out in the NPPF and Local Plan Policy EN2.

Daylight, Sunlight and Overshadowing

8.124. Paragraph 130 of the NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future users of place. Furthermore, national guidelines for daylight and sunlight issues are contained with BRE guidelines, local policy refer to these guidelines as the accepted standard.

8.125. Local Plan Policy CC8 states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residents.

8.126. A Daylight and Sunlight Assessment has been prepared by Delva Patman Redler, which includes a detailed technical analysis to quantify the effect of the proposed development upon the daylight and sunlight amenity to the existing properties, as well as an assessment of internal standards of daylight for proposed users of the Proposed Development.

8.127. The Daylight and Sunlight Assessment concludes that the majority of dwellings would satisfy a strict application of the guidelines in respect of daylight.

8.128. Turning to sunlight, the high majority of dwellings would satisfy the guidelines, with at least one habitable room capable of receiving at least 1.5 hours of sunlight on 21 March.

8.129. In respect of the external amenity spaces assessed, all but one would satisfy the general guideline for sun on ground of at least 50% of the space proposed over a two hour period.

8.130. The advice in the BRE guide is not mandatory, and its numerical guidelines should be interpreted flexibly. As noted in the NPPF, greater flexibility should be afforded when applying the guidelines to the Proposed Development because it is in an urban location identified within the MQAODF where taller, higher density development is anticipated.

8.131. The internal daylight and sunlight assessments demonstrate that a high number of rooms and dwellings would meet the daylight illuminance and sunlight exposure criteria. Rooms and/or dwellings which do fall shy of the guidelines are predominately due to the northern aspect of the spaces which naturally would experience far less sun exposure. Similarly, dwellings at lower levels within Blocks B and C which face in an easterly or westerly direction do also experience levels of daylight and sunlight which are below guidelines predominately due to the view of the respective adjacent towers of the scheme.

8.132. The amenity areas contained within the scheme have been predominately situated within the scheme to areas which will experience high levels of sunlight.

8.133. Given the Site sits within the MQAODF, higher levels of obstruction are envisaged, and lower levels of daylight and sunlight are inevitable, and as the proposed development has been designed to fulfil the aspirations for the Opportunity Area, there is an even greater imperative for a flexible approach to be taken in applying daylight and sunlight policies and guidance.

8.134. Taking the above into consideration, it is considered that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 130 of the NPPF and Local Plan Policy CC8.

Noise and Vibration

8.135. Paragraph 183 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

8.136. Paragraph 185 within the NPPF states that planning decisions should aim to avoid noise giving rise to adverse impacts on health and quality of life as a result of new development.

8.137. Local Plan Policy CC8 states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residents.

8.138. The Proposed Development has been designed to avoid noise that could adversely impact on health and quality of life and mitigate and minimise any adverse impacts arising from noise associated with the Development.

8.139. An assessment of likely noise and vibration was undertaken as part of the Environmental Statement. In order to assess likely noise levels, a baseline for noise and vibration levels was established on the Site and surrounding areas. An assessment was made of the likely noise and vibration resulting from demolition and construction and design aims for plant and services associated with the Proposed Development were established.

8.140. The assessment confirms that changes in noise levels due to construction traffic are likely to be negligible (not significant). It is expected that the significance of the noise and vibration effects of the construction phase of the development could be minor adverse to negligible (not significant).

8.141. Considering noise and vibration impacts, the Noise Impact Assessment feeding into the Environmental Statement concludes that during the operational phase of the Proposed Development, the noise and vibration effects of associated road traffic, on-site activities and fixed plant on roofs are negligible (not significant).

8.142. An assessment of cumulative effects relating to the wider MQAODF has also been undertaken. Under the MQAODF the Proposed Development comprises the first phase of delivery, which also accords with the submission of this application. Further phases would see the area immediately to the south of the site undergo mainly residential-led regeneration.

8.143. It is anticipated that the Proposed Development will be under construction simultaneously with the following Phases of the MQAODF. Therefore, cumulative construction noise as a result of the Proposed Developments is anticipated to have an adverse impact on the surrounding area. The extent of the cumulative impact is dependent on the construction programme, processes, and location and therefore is difficult to predict. Given the proximity of the developments, it is likely that there will be Moderate to Major Adverse impact on surrounding receptors, however the scale will be dependent on the factors mentioned previously and the Applicant has committed to working with the Council on this matter, which will form part of planning conditions related to the CEMP.

8.144. The above demonstrates that the Development fully accords with the NPPF (Paragraphs 183 and 185) and Local Plan Policy CC8.

Wind and Microclimate

8.145. The assessment of wind conditions requires a standard against which the measurements can be compared. The Wind Microclimate Report contained within the Environmental Statement uses the Lawson Comfort Criteria, which have been established for over 30 years.

8.146. For the existing site, the wind microclimate at the Site and surrounding area are suitable for sitting use to strolling use during the windiest season.

8.147. Wind conditions at and surrounding the Proposed Development would generally range from suitable for sitting use and strolling use during the windiest season.

8.148. A comprehensive quantitative wind microclimate assessment has been carried out based on CFD modelling and on boundary layer wind tunnel testing approaches. From this assessment the following conclusions are drawn for the proposed Broad Street Mall development:

- With the proposed development in place the wind microclimate in the public realm at ground level will remain suitable for the planned uses in existing and cumulative surrounds
- The wind comfort at the elevated level resident's amenity spaces is overall suitably comfortable and safe for the planned uses. It is recommended that consideration be given to locally enhancing the wind comfort levels through the introduction of locally increased tree planting and additional hedges near the seating areas of the podium terraces

Flood Risk and Drainage

- 8.149. The NPPF and accompanying National Planning Practice Guidance (NPPG) set out the Government's national policy on development and flood risk and seeks to provide clarity on what is required at regional and local levels to ensure flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk. The NPPF outlines a risk based approach to the planning process and requires a Sequential Test is used in cases where sites are located in vulnerable flooding zones to guide the decision making process by steering development to areas with the lowest probability of flooding where feasible.
- 8.150. The NPPG also provides details of how all new development must include appropriate consideration of the potential effects of climate change on flooding and the hydrological regime, within Flood Risk Assessments: climate change allowances (last updated February 2022). The NPPG refers to the Environment Agency's Guidance to support the NPPF. Depending upon the specific River Basin District that the proposed development site lies within, the guidance indicates precautionary increases in fluvial flows, sea levels and rainfall intensities that should be applied when assessing the risk of flooding, from now until 2115.
- 8.151. Local Plan Policy EN18 notes that development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF.
- 8.152. As set out in the accompanying Flood Risk Assessment and Drainage Strategy, the Site contains Broad Street Mall and is brownfield in nature and 100% impermeable.
- 8.153. The Site is in an area designated as Flood Zone 1 where the probability of river or sea flooding is less than 1 in 1000 chance in any given year. Therefore the probability of tidal or fluvial flooding is negligible.
- 8.154. Available baseline information indicates that within the Site there are no significant flood risk concerns for the development. All sources of flooding have been investigated and have been deemed low/negligible. A surface water drainage strategy has been designed in line with the most recent EA Climate Change Guidance to consider and manage the impact of a 1:100 year plus climate change rainfall event. The surface water drainage strategy considers surface water runoff management: the solutions proposed ensure that for the 100 year plus 40% climate change allowance event, surface water will be accommodated within the Site and therefore prevent potential exceedance flows off-site.
- 8.155. The proposed drainage strategy incorporates sustainable drainage systems (SuDS) features in the form of blue roofs. The Site's surface water has been reduced as low as possible to ensure a gravity connection, in accordance with Reading's requirements before

discharging into the local Thames Water surface water sewer network. Consultation with the EA, LLFA and Thames Water (TW) has been carried out throughout the preparation of this FRA and DS to ensure their awareness of the proposals, their ability to advise on site constraints and on the proposed surface water drainage strategy.

8.156. In light of the detailed work undertaken it is considered that the Proposed Development is in accordance with Local Plan Policy EN18.

Cumulative Development Context

8.157. Significant heritage and townscape assessment has been undertaken during the design development process to bring forward a scheme that respects its current context, optimises the delivery of much needed housing and recognises the evolving face of Reading and, in particular, this area of the town centre.

8.158. As set out in Section 7, land adjacent to BSM is subject to an overarching policy framework that sets the context for the positive change of the former Civic Area and the Police Station. The announcement of the winning bidder for the Minster Quarter will be made in early 2024 and this signal commencement of initial due diligence to enable the regeneration of this area over the next 5 or so years. Concurrently, it is understood that the Police Station and HexBox proposals have been subject to pre-application discussion with the Council and are both likely to be submitted for consideration within the relative short term.

8.159. The changes to this area, comprising that at BSM and the Minster Quarter, Police Station and Hexbox developments, will create a future development scenario that vastly differs from that in-situ. When considering proposals at BSM, it is therefore important to recognise this changing context and therefore how this will affect short, medium and long-distance views from different vantage points around the site.

8.160. The HTVIA assessment has sought to review the future development scenario and includes the scale and massing set out in the MQAODF, plus that consented at Station Hill and other consented or implemented and emerging schemes. A series of CGI's showing the current baseline scenario, that attributable to the BSM proposals and that related to BSM and the MQAODF are provided within the HTVIA.

8.161. The future development scenario is a significant material consideration that should be given weight in the decision-making process. The Council recognises that to meet housing need and to drive interest and greater use of the town centre that new uses, regeneration and improved places and spaces are required.

8.162. BSM's wider vision, as set out in paragraphs 4.22 to 4.25 identifies a desire to create a new town-centre based community that will benefit from and underpin services in the shopping centre.

8.163. This new vibrance is underpinned by the delivery of the residential-led scheme and it is therefore necessary to bring forward the scheme in a deliverable manner to enable the

identified, desired change that the Council has signed up to within the Local Plan and its associated update. For the technical and legislative reasons set out earlier in this document, the Extant Consent was not capable of being delivered and the revised scheme therefore represents the most viable and appropriate means of meeting aspirations for development at BSM.

8.164. Furthermore, BSM will form the first phase of the wider Minster Quarter regeneration area that is enshrined in the Local Plan. The regeneration which represents change to one of the most important, central sites in Reading, offers opportunity to move beyond the unsuccessful brutalist buildings and spaces of the recent past, whilst recognising the contribution made to the town's history. The wider proposals, for which significant feasibility work has been undertaken as part of an ongoing bid process, will form a distinct new area, intentionally different from its surroundings, but sufficiently separate and appropriately massed to ensure that nearby Conservation Areas and Listed Buildings are adequately protected and retain their character and individuality whilst enabling new, beneficial, earmarked development to come forward.

The Planning Balance

8.165. In the planning balance, it is considered that whilst the proposals will create new height and visible buildings within a locality close to listed buildings and conservation areas, the positioning of built form is sufficiently separate to enable this to come forward in an acceptable manner.

8.166. The future development scenario means that viewing of BSM will be taken in context of a changing town centre with more tall buildings, including some that occupy the foreground, as in the case of the proposed Minster Quarter buildings, when viewed from Gun Street, Castle Street and the Baker Street Area.

8.167. In addition, the proposed development will provide a series of recognisable benefits that need to be given due weight in the Council's assessment:

- Delivery of 644 much-needed homes;
 - Within this, a high proportion of larger 2 bedroom and 3 bedroom homes.
 - Provision of a tenure-blind scheme, allowing all residents the same quality housing and access throughout the development.
 - All homes to Nationally Described Space Standards.
 - All homes with access to internal and external amenity spaces for relaxation, socialising and play.
- Rejuvenation of Queens Walk and Dusseldorf Way, making the area more accessible, safe and welcoming.

- Provision of new town centre uses on the site frontage helping with surveillance, reducing anti-social behaviour and benefitting the adjacent Hexagon in terms of juxtaposition with complementary uses.
- Enablement of greater levels of town centre living, supporting local businesses and services and creating employment opportunity.
- Significant new tree and shrub planting and urban greening and associated biodiversity new gain.
- CIL and S106 contributions arising from the scheme towards a range of services, initiatives and on-site improvements, the detail of which is set out in the following section.

9. CIL and Planning Obligations

Community Infrastructure Levy

- 9.1. CIL is a tariff chargeable by Reading Borough Council on new development following 1 April 2015. In relation to the Site, CIL is charged at £120 per sqm (GIA), as indexed, currently £179.29 for C3 Use Class and £0 for the Class E uses proposed.
- 9.2. The Proposed Development is therefore CIL liable and a CIL payment would be made as part of the Proposed Development. Details of proposed area liable for CIL, alongside those areas subject to demolition that can be deducted from calculations have been provided as part of this application.

S106 Obligations

- 9.3. The Scope of any prospective Section 106 Agreement will be subject to further detailed discussions during determination of the application. Obligations will be in accordance with Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended), which are:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 9.4. Reading Borough Council has an adopted Planning Obligation SPD (April 2015), which alongside that discussed at pre-application phase has helped form the proposed draft Heads of Terms, as set out below.
- 9.5. It is proposed that the Section 106 Agreement may contain planning obligations which could secure obligations for the following in line with that agreed for the Extant Consent:
- On-site affordable housing provision, subject to viability review;
 - Employment and Training relating to the construction and operational phases of the Proposed Development;
 - Travel Plan;
 - Public Realm Improvements;
 - Provision of Public Art;
 - Contribution towards Leisure facilities in the Borough;
 - Carbon Offset Levy;

- Other site specific mitigation measures required by the Environmental Statement;
and
- Monitoring and implementation.

9.6. The negotiation of the above detailed obligations will have regard to all relevant site specific constraints and considerations, any CIL liability and the overall viability of the Proposed Development.

9.7. These Draft Heads of Terms are provided without prejudice.

10. Conclusions

- 10.1. This Planning Statement has been prepared by Opus Works to accompany detailed applications for:

“Part-demolition of existing retail units, car park and service areas, demolition and rebuild of car park ramp, and construction of a residential-led, mixed-use development fronting Queens Walk and Dusseldorf Way, including all necessary enabling and alteration works required”

and

“Part-demolition of podium deck on Dusseldorf Way and Queens Walk, amendments to existing retaining wall, excavation works and road and hardstanding re-alignment to create a temporary construction area related to proposed redevelopment works at Broad Street Mall”.

- 10.2. The planning application is submitted following significant pre-application engagement with Council Officers and Members, local stakeholder groups and local residents and businesses, which has helped positively mould the proposals submitted for consideration.
- 10.3. The Proposed Development identifies changes to the Extant Consent necessary to enable the development to be delivered and also utilises an area of land left unimplemented following the Lapsed Consent. As such, the proposals allow for comprehensive redevelopment of land in line with the MQAODF and Local Plan policy which may otherwise stall, undermining the Council’s aspirations for the wider area.
- 10.4. The new proposals provide a technically-deliverable scheme that will transform Dusseldorf Way/Hosier Street and Queens Walk, bringing new life and vibrancy to an area currently beset with anti-social behaviour issues and which has been neglected and is in obvious decline.
- 10.5. The Proposed Development will also engender greater surveillance and use of the locality, benefitting BSM in terms of creating greater footfall and also acting as a wider anchor to the area, attracting people towards the culture hub extending from Reading Minster to the Hexagon.
- 10.6. The proposals have been subject to very significant due diligence that provide great certainty to the Council, assisting its own proposals for the Hexagon and the Minster Quarter. Whilst the proposals are currently standalone, opportunity for synergies in respect of public realm, energy generation and construction logistics have been identified with the

applicant identifying a willingness to work with the Council to optimise delivery of development across the wider MQAODF area.

- 10.7. The latest proposals accord with current policy and legislation in respect of fire safety, unit sizes and daylight and sunlight and better respond to Council ambitions in terms of housing delivery and provision of larger unit and family accommodation.
- 10.8. The Proposed Development utilises a more traditional building methodology, which in turn enables more comprehensive and considered regeneration that will deliver a more robust, durable and relevant building to Reading using heavier weight, higher-quality materiality that better reflects the local heritage and vernacular.
- 10.9. The proposals also enable BSM to continue operations, helping business to be maintained and then thrive in the new retail environment that will be created.
- 10.10. A very detailed assessment of the scheme has been undertaken to consider environmental matters and appropriate design development and mitigation has been proposed. Appropriate mitigation and planning control through use of conditions and planning obligations has been proposed and the applicant welcomes further discussion with the Council in this regard.
- 10.11. In respect of perceived impact on heritage assets, it is noted that the MQAODF and Extant Consent set a baseline that has formed the starting point for project assessment. Consequent discussions with decision-makers and assessment of the Extant Consent identified the need for project change to meet policy and legislative requirements, to reflect changes to relevant height datum responding to tall buildings policy and to deliver upon the Council's own aspirations for the area and Borough in general as set out in the MQAODF and emerging policy.
- 10.12. This is a project that is deliverable, will provide a greater quantum of better quality housing, will provide a greater proportion of larger-sized houses and which will bring forward a more integrated community, benefitting from a tenure-blind development with access to significant internal and external amenity spaces, supported by a rejuvenated and substantially greened public realm.
- 10.13. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 10.14. This Planning Statement assesses the Proposed Development against the Development Plan and other relevant national and local planning policy and guidance.

10.15. The detailed documentation forming this planning application identify reasons for the failure of previous consented applications and demonstrate how to ensure delivery of the Proposed Development in this instance, this complying with the requirements of the NPPF and the adopted Development Plan. On this basis, it is therefore respectfully requested that the Council grant consent for the Proposed Development without delay.

Appendix 1 – July 2023, Exhibition Boards

Appendix 2 – D:SE Report

Appendix 3 – January 2024, Exhibition Boards

Appendix 4 – BSM Demolition Areas

Appendix 5 – Temporary Construction Area details

Appendix 6 – Local Plan Extract and Key

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