



Quod

Planning Statement

Flint Street

JUNE 2026

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1 Executive Summary and Benefits of the Proposed Development

Overview

- 1.1 This Planning Statement has been prepared on behalf of S2 Estates (the Applicant) in support of a full planning application (the Application) for the former Thames Valley Police Station, Castle Street, Reading, RG1 7TH ('the Site').
- 1.2 This Planning Statement explains the Application in the context of the relevant planning policies. It should be read in conjunction with the wider application documents which comprise the Application submission, and these are listed in Section 2 of this Statement.

The Vision for Flint Street

- 1.3 Flint Street will transform the former police station into a welcoming gateway into Reading town centre, celebrating the area's heritage while supporting everyday movement and community life. Flint Street is envisioned as a high-quality urban environment that integrates historic character with contemporary principles of sustainability, creating an attractive and inclusive place to meet, pass through, and spend time, clearly marking the Minster Quarter from the South West, and into the heart of the town.
- 1.4 The development will be a net zero, residential-led mixed-use scheme delivering around 205 new homes, with 30% of these being affordable. Redeveloping the former Thames Valley Police HQ site creates an exciting opportunity to improve pedestrian connections to the town centre, introduce more than 1810m² of active non-residential uses such as shops and community spaces, and provide new public open spaces for everyone to enjoy. It is hoped that this will provide the catalyst for change in this part of the town centre.

The Site

- 1.5 The Site is located in Reading town centre, within the jurisdiction of Reading Borough Council ('RBC'). RBC act as the Lead Local Flood Authority (LLFA) and Highways Authority.
- 1.6 The Site is currently host to Thames Valley Police Station, which is now vacant. The Thames Valley Police relocated to a new facility on Imperial Way in November 2025. The Site comprises an irregularly shaped building with a maximum height of five storeys, with undercroft parking to the rear.
- 1.7 To the north of the Site is Lavender Place Community Garden, beyond which is The Hexagon, a modern theatre. To the east of the Site is Reading Magistrates' Court. To the south of the Site is Castle Street, with a number of listed buildings in residential and commercial use on the adjacent side of the road. To the west of the Site is the A329, known as the Inner Distribution Road, which is a mostly dual carriageway ring road which encircles the town centre of Reading.

Policy Allocation

- 1.8 The Reading Borough Local Plan was adopted in November 2019. This sets out the planning policies up to 2036. Within the Local Plan, the Site is located within a site identified for development or change (CR12e West Side Major Opportunity Area).
- 1.9 The Site is within the Tall building Zone CR10b, the policy for which recognises that a cluster of tall buildings would be appropriate to “create a distinctive grouping, to mark the areas as the civic heart of Reading and a gateway to the centre”.
- 1.10 The Reading Local Plan was adopted in November 2019. A consultation on a Partial Update to the Plan (Regulation 19) took place in late 2024. The Partial Update to the Local Plan was submitted for examination in May 2025. Stage 1 and 2 hearings took place in November 2025 and February 2026, respectively, but the next steps are not yet known.

Format of the Planning Application

- 1.11 The planning application is submitted in detail.

Proposed Development

- 1.12 The description of development for the proposals is as follows:

Full planning permission for the demolition of the existing building and the erection of a residential-led mixed-use development comprising Use Class C3 residential units, with Use Class E and Sui Generis on the ground floor and with some elements at lower ground floor, plus public realm, hard and soft landscaping, access and servicing arrangements, cycle parking, and other associated works.

Consultation and Engagement

- 1.13 The Applicant has undertaken extensive consultation and engagement with local and statutory stakeholders in advance of the submission of the Application, including formal public consultation, seven pre-application meetings with RBC, as well as a one session with FRAME Design Review Panel.
- 1.14 The guidance and recommendations of officers have played a very important role in shaping the design of the Proposed Development. The accompanying Design and Access Statement demonstrates how the feedback has been addressed and the design improved through engagement with them, the Design Review Panel and wider consultations

Planning Assessment

- 1.15 The Application proposals comply directly with the site specific allocation CR12e and the policies of the Reading Local Plan as a whole. They are also strongly consistent with important objectives of national policy, and the strength of that policy support creates a strong presumption in their favour.

1.16 Further, RBC is only able to demonstrate 3.43 years' of housing supply, falling short of the required five years. The Proposed Development can contribute to ameliorating this shortfall by providing 205 homes.

1.17 As such, the application should be approved without delay.

Benefits of the Proposed Development

1.18 The benefits of the planning Application are extensive and have been set out contextually throughout this Planning Statement. The benefits are as follows:

Economic

- Provision of housing opportunities for local workers, resulting in more local spend and retention of a workforce residing in Reading.
- The provision of commercial uses at the ground floor will promote local spend and provide employment opportunities.
- The regeneration of a currently neglected area to be revitalised into an appealing and welcoming gateway to Reading, attracting more visitors to the area.

Social

- The Proposed Development will deliver a policy compliant level of affordable housing, resulting in 62 affordable homes.
- The provision of 205 Build to Rent homes is a significant benefit to Reading, helping to contribute to the housing supply in the area.
- The provision of accessible homes at a level which exceeds local policy will ensure that the homes are inclusive.
- The simplification of levels and access routes around the Site will provide for a safer and more inclusive environment.
- An appropriate mix of home sizes is proposed, reflective of the accommodation type required in Reading and recognition of the town centre location being appropriate for smaller homes.
- The inclusion of active ground floor units will encourage visitors to the development and provide a safe and inviting environment for pedestrians.
- The provision of a police room at the ground floor will allow for a continued police presence in the areas.

Environmental

- The Site will deliver c19% biodiversity net gain on Site including through the provision of green roofs.
- The Site will be predominantly car-free, providing a significant benefit to the local environment, including air quality.
- The Proposed Development represents an efficient use of a vacant, brownfield, town centre location. Prioritising development in brownfield land is supported at a national and local level.

- The Proposed Development could achieve a carbon reduction of 60%, well in excess of the Part L requirement of 31%.

2 Introduction

2.1 This Planning Statement accompanies a full planning application submitted on behalf of S2 Estates ('the Applicant') in respect of the redevelopment of the former Thames Valley Police Station, Castle Street, Reading, RG1 7TH ('the Site').

2.2 The description of development (the 'Proposed Development') is provided below:

Full planning permission for the demolition of the existing building and the erection of a residential-led mixed-use development comprising Use Class C3 residential units, with Use Class E and Sui Generis on the ground floor, plus hard and soft landscaping, access, cycle parking, and other associated works.

2.3 A more detailed explanation of the Proposed Development is provided within Section 6 of this document. The application Design and Access Statement provides illustrative material, as well as a review of the design process and scheme specifics across a number of topics.

2.4 This Planning Statement reviews the Proposed Development considering the development plan, national policy, relevant guidance and material considerations. It sets out the clear and demonstrable benefits of the site redevelopment to deliver a range of new homes, active ground floor commercial floorspace, a landscaped public courtyard and public realm in a sustainable location.

2.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. For reasons more fully set out in this planning statement, the development accords with the development plan and its compliance with other significant material considerations, principally the National Planning Policy Framework (December 2024, as amended in February 2025) ("NPPF") further reinforces the case for a grant of planning permission without delay.

The Applicant

2.6 The Application is submitted on behalf of S2 Estates, who are a private property investment and development company, with over 35 years' experience in the financing and development of mixed use residential-led developments in London and the South East.

2.7 The Applicant has worked seamlessly in partnership with Reading Borough Council and other relevant stakeholders to develop the detail of the Application and this close collaboration will continue as the Site is developed.

Structure of this document

2.8 This Planning Statement explains the Proposed Development in the context of the relevant planning policies. It is structured as follows:

- Section 1 – Executive Summary and Benefits of the Proposed Development
- Section 2 – Introduction
- Section 3 – Site and Surrounding Area
- Section 4 – Planning History
- Section 5 – Engagement and Consultation
- Section 6 – Proposed Development
- Section 7 – Planning Policy and Guidance
- Section 8 – Principle of Development
- Section 9 – High Quality Design
- Section 10 – Highways, Access and Parking
- Section 11 – Built Environment
- Section 12 – Sustainability and Green Infrastructure
- Section 13 – Planning Balance and Conclusions

Scope of the application

2.9 This Planning Statement should be read in conjunction with the wider application documents, which comprise the planning application submission and which are listed below:

Document Title	Author
Air Quality Assessment	Mayer Brown
Application Drawings	JTP
Arboricultural Survey Impact Assessment & Method Statement	Marcus Foster
Archaeological Desk-Based Assessment	RPS Tetra Tech
CIL Additional Information Form	Quod
Completed Application Form	Quod

Cover Letter	Quod
Daylight and Sunlight Effects Report	Delva Patman Redler
Internal Daylight and Sunlight Report	Delva Patman Redler
Delivery and Servicing Plan	Paul Basham Associates
Design & Access Statement including Crime Reduction Statement and Lighting	JTP
Energy Statement	PSH Consulting Ltd
Overheating Study	PSH Consulting Ltd
Fire Statement	Jensen Hughes
Flood Risk Assessment, Drainage Strategy and SuDS Assessment	Meinhardt
Heritage, Townscape and Visual Impact Assessment	Montagu Evans
Wind and Microclimate Assessment	Architectural Aero
Noise Impact Assessment	RBA Acoustics
Planning Statement	Quod
Preliminary Ecological Appraisal	Exterior Architecture
Transport Assessment	Paul Basham Associates
Travel Plans	Paul Basham Associates

2.10 The suite of submission documents have been agreed with RBC during the pre-application process.

2.11 The application is also supported by a wide range of architectural and landscape drawings which are detailed in **Appendix 1**.

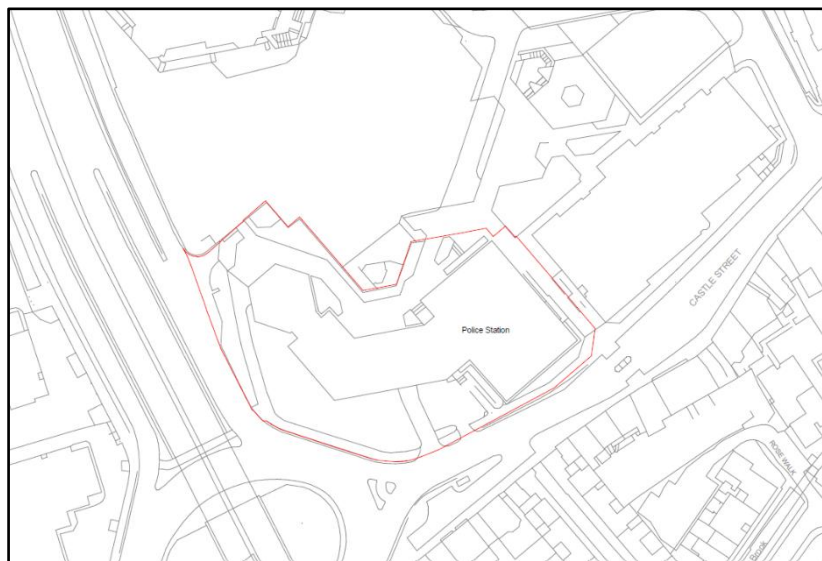
3 Site and Surrounding Area

- 3.1 This section of the Planning Statement reviews the current characteristics of the Site and provides an overview of the surrounding area to provide a physical context of the application proposal. Section 3 also provides a summary of the Site's planning designations and relevant history.

Application Site

- 3.2 The Site Location Plan is provided at **Figure 1**.

Figure 1 - Site Location Plan



- 3.3 The Site currently accommodates the former Thames Valley Police Station and extends to approximately 0.55 hectares (ha) in Reading Town Centre. The Site comprises a 5-storey building with predominantly brick and glasswork façade. The Site includes a small car park, fronting Castle Street for visitors of the former police station along with parking in the basement area.
- 3.4 The Site sits on a podium which stretches northwards towards Dusseldorf Way and to Broad Street Mall.
- 3.5 Primary vehicular and servicing access to the Site is made from Castle Street at below ground podium level. Vehicles can leave the Site by using the same route on Castle Street or by using the Broad Street Mall car park entrance, which leads onto the Reading Inner Distribution Road (IDR).
- 3.6 The Site includes existing greening and minor landscaping at the southern façade fronting Castle Street. A number of trees comprise the western boundary treatment separating the existing building and pedestrian areas from the IDR. Smaller trees front the IDR roundabout at the south of the site.

Site Accessibility

- 3.7 The Site is located adjacent to the A239, to which there is currently direct pedestrian and vehicular egress from the Site. Vehicular and pedestrian access is possible from Castle Street, located to the south of the Site. Pedestrian access is also possible from Castle Street along Cusden Walk, providing a walking route through to Broad Street Mall Shopping Centre.
- 3.8 From the Site, it is a 12-minute walk (900m) to Reading Train Station, with access to National Rail services and the Elizabeth Line. Trains from Reading run towards London, the West County, the Midlands, Wales, the South Coast and the North. It is a very well connected station and is the second busy interchange station outside of London.
- 3.9 In terms of localised accessibility, there are bus stops on Castle Street which serve a number of bus routes including services to Newbury, Calcot, Tadley and Central Reading.
- 3.10 The Site is well connected for pedestrians, with an existing footpath being located to east of the Site (shown in orange on **Figure 2**), providing pedestrian access towards the centre of Reading. This footpath is also shared with the Town Centre cycle route (shown in purple on **Figure 2**).

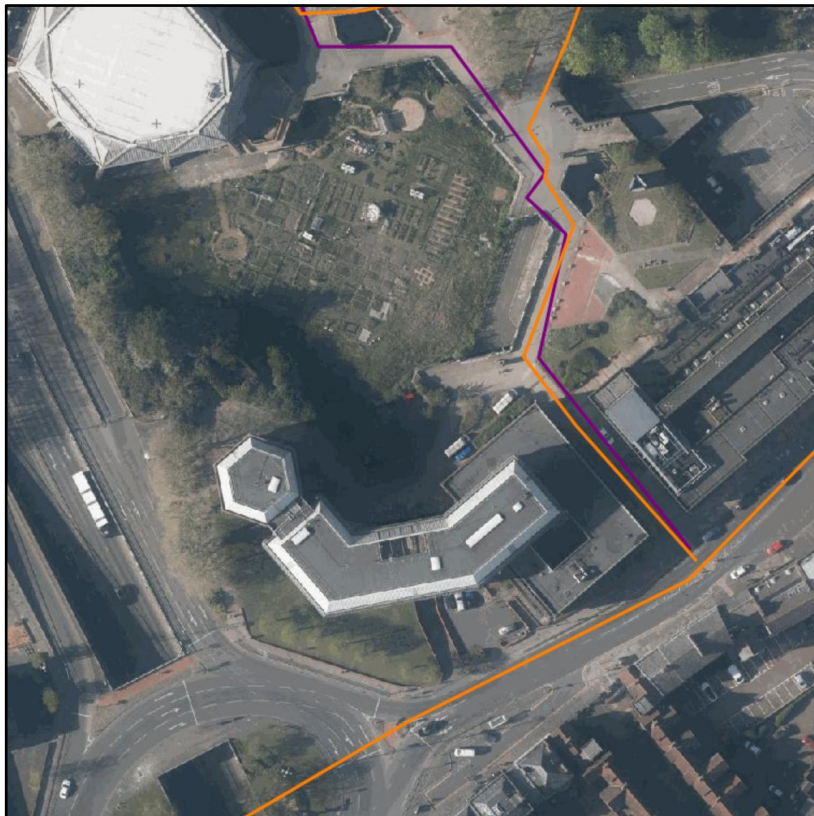


Figure 2 Reading Borough Council Cycle and Walking Network

Site Designations

Air Quality

- 3.11 The Site is located within the Air Quality Management Area (Policy EN15) where development should have regard to the need to improve air quality and reduce the effects of poor air quality.

Archaeology

- 3.12 The Site is located within the Area of Archaeological Potential (Policy EN2) where applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record, which will require an assessment of the archaeological impacts of development proposals to be submitted before the planning application is determined.

Flood Risk

- 3.13 The Site is located in Flood Zone 1 and is in an area at very low risk of surface water flooding or flooding from the rivers and the sea. The Site is outside of a groundwater flood alert area and flooding from reservoirs is unlikely in this area.

Heritage

- 3.14 The Site is not located within a Conservation Area, albeit the boundary of the St Mary's Butts/Castle Street Conservation Area is on the northern side of Castle Street, whilst the Castle Hill/Russell Street/Oxford Road Conservation is located on the western side of the IDR. The Site does not contain any listed buildings, albeit there are a number of listed buildings within close proximity to the Site, including several Grade II listed buildings on the southside of Castle Street, including 1-32 Almshouses and Church of St. Mary (Grade I listed) on the eastern side of St Mary's Butts (see **Figure 3**).

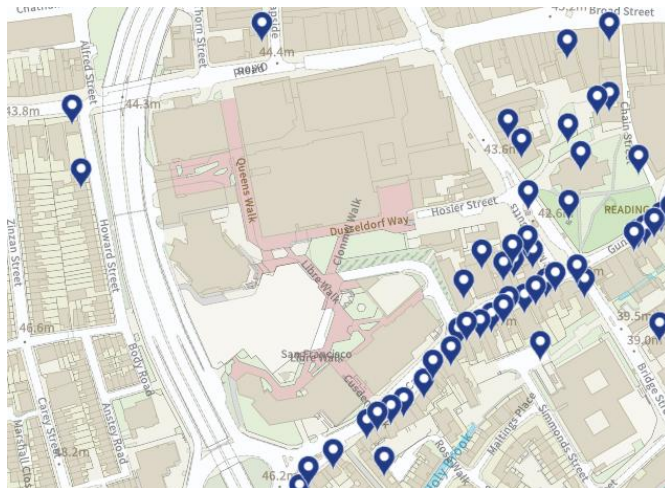


Figure 3 - Listed Building Map

Surrounding Area

- 3.15 The surrounding area is comprised of a mix of commercial, office, retail, leisure and residential uses. To the north of the Site is the former Lavender Place Community Gardens and the Hexagon Theatre, now a building site. Further north is the Broad Street Mall, which is an established retail, leisure, food and beverage destination situated in the centre of Reading. Immediately east of the Site is the Reading Magistrates Court and further east is the Sun Inn and the Church of St Mary.
- 3.16 To the south of the Site across Castle Street are several Grade II Listed Buildings including the Alms Houses. To the west across the A239 are offices including the Salvation Army Church and Community Centre and the Carey Centre. To the west across the IDR is the Castle Hill residential neighbourhood.

4 Planning History

Introduction

4.1 Section 4 of the Planning Statement sets out the relevant Planning History for the Site and surrounding area.

Thames Valley Police Station planning history

4.2 Planning History of the Site is re-provided in **Table 1**Table 1.

Table 1 Planning History

Application Reference Number	Description of Development	Decision
PL/93/0567	Temporary office and link to main police station.	Granted 16 th December 1993
PL/98/0766	Construction of disabled access ramp in Cusden Walk including partial removal of existing planter	Unknown Decision 3 rd April 1998
PL/99/2228	To convert an existing gymnasium into offices by installing an additional floor, and provide new windows to match existing.	Granted 13 th April 1999
PL/01/0235	Construction of 2 no fire exits and external staircase to provide secondary means of escape routes serving the basement custody suite and street level	Granted 26 th October 2001
PL/05/0613	External alterations to improve access by replacing the current ramp with a platform lift	Granted 18 th April 2005
PL/08/0558	Provision of roof safety handrails	Approved 28 th May 2008

PL/10/0663	Removal of existing external wheelchair lift at main entrance and provision of new disabled access ramp	Granted 23 rd September 2010
PL/10/1818	Discharge of conditions 3, 4 and 5 of planning permission 10/00750/FUL	Conditions Discharged 14 th February 2011

Recent relevant surrounding planning history

Broad Street Mall

- 4.3 Planning permission relating to the redevelopment of Broad Street Mall was first granted on 6th December 2021 (application reference. PL/18/2137) for the following:

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.

- 4.4 Since permission has been granted several technical, operational and legislative planning changes necessitated a full review of the extant permission. As such, permission was not implemented and has now lapsed.
- 4.5 Planning permission (application reference. PL/24/0173) was subsequently submitted for the part-demolition of existing retail units, car park and service areas, demolition and rebuild of car park ramp, and construction of a resident-led, mixed-use development fronting Queens Walk and Dusseldorf Way, including all necessary enabling and alteration works required. A decision on the application has not yet been issued, but RBC resolved to grant permission, subject to satisfactory completion of the S106 agreement.

5 Engagement and Consultation

Introduction

- 5.1 This section of the Planning Statement sets out the pre-application process and engagement which the Applicant has taken as the development proposal has evolved. This should be read alongside the application Statement of Community Involvement.
- 5.2 Paragraph 39 of the NPPF identifies early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality Pre-Application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 5.3 NPPG Paragraph 1 (reference ID:20-001-20190315) identifies this can be achieved by:
- *Providing an understanding of the relevant planning policies and other material considerations associated with a proposed development*
 - *Working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development, including, where relevant, the need to deliver improvements in infrastructure and affordable housing*
 - *Discussing the possible mitigation of the impact of a proposed development, including an planning conditions*
 - *Identifying the information required to accompany a formal planning application, thus reducing the likelihood of delays at the validation stage. The information requested must be reasonable (more information can be found in Making an application).*
 - *Putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application.*

Pre-Application Discussions with RBC

- 5.4 Reflective of the above, the Applicant began early discussions with RBC in relation to the re-development of the Thames Valley Police Station in July 2022 and has completed a comprehensive period of pre-application with Officers spanning 4 years.
- 5.5 This included:
- RBC Pre-application 01 – July 2022
 - RBC Pre-application 02 – February 2023
 - Meeting with McLaren – February 2023

- Meeting with Cllr Tony Page – April 2023
- RBC Pre-application 03 – August 2023
- Scheme Paused in August 2023 and Design Team Re-engaged March 2025
- RBC Pre-application 04 – April 2025
- RBC Pre-application 05 – July 2025
- RBC Pre-application 06 – September 2025
- RBC Pre-application 07 – November 2025
- Meeting with McLaren – December 2025

- 5.6 The Applicant entered into a formal Planning Performance Agreement (PPA) with RBC in May 2025.
- 5.7 When the Applicant presented the proposed scheme at the RBC Pre-application 03, in August 2023, the proposed scheme included a complex building layout and roof form factor and sought to provide over 259 homes across 7, 10, 14 and 16 storey elements.
- 5.8 Following the significant pause on the scheme throughout 2024 and early 2025, to enable the Minster Quarter Site promoters to develop their proposals, the applicant design Team re-engaged, and a new proposal was presented with a more simplified massing and layout that responds to new legislation in light of changing building regulations and guidance, including the requirement for a second stair core.
- 5.9 Throughout 2025, the proposed scheme evolved with significant reductions in residential footprint to Block A to improve the quality of public realm adjacent to the IDR Roundabout and Castle Street, and to Block B to align with neighbourly principles towards the indicative Minster Quarter Framework. The Applicant has sought to reduce the height of Block B from 14 and 20 storeys to 12 and 16 storeys.
- 5.10 **Table 2** below provides a summary of the ways in which the Proposed Development has evolved through the pre-application process.

Table 2 - Summary of RBC Comments and Applicant Response

Comments from RBC	Design Response
Consideration to be given to simplify the building form and layout.	The Design Team have revised the massing and layouts to respond to new legislative building regulations, including the second stair core requirement.
Consideration to reduce the footprint of Block A to improve the quality of public realm adjacent to the IDR Roundabout and Castle Street.	The corner of Block A has been stepped back to provide more public realm space.
Review the height and footprint of Block B so it aligns with neighbourly principles of the Minster Quarter Framework.	Block B heights have been significantly reduced from 14 and 20 storeys to 12 and 16 storeys. Separation distances between the Block B and the indicative footprints of the proposed buildings on the neighbouring site have increased by a further 1.6 metre to a minimum of 8.2m from the red line boundary.
Request to remove the proposed servicing bay on Castle Street	The proposed servicing bay on Castle Street has been removed and all servicing is to take place at basement level. Additional landscaping has been provided on Castle Street.
Request to retain the existing trees fronting the IDR Roundabout and Castle Street	The existing trees will be retained, where possible, and additional trees will be planted along Castle Street

5.11 Full detail on the contents and the design evolution as a response to each of the pre-application meetings is provided within the Design and Access Statement (prepared by JTP) which forms part of the planning submission.

Design Review Panel

- 5.12 The Applicant and the Project Team presented the emerging proposals to the Frame Design Review Panel (FDRP) on the 11th February 2026. The panel's feedback has assisted the design team in identifying key areas of analysis, interrogating an appropriate approach to landscaping and public realm treatment and refining the architectural treatment of the emerging development.
- 5.13 The FDRP was held at Reading Borough Council's offices, which included a site visit. The Project Team presented the material which focused on scale, massing, landscaping, public realm and design features. A summary of the feedback from FDRP is provided below:

- The Panel supports the redevelopment of the site as a mixed-use, residential-led scheme.
- The Panel considered that the proposed heights, massing and scale are broadly appropriate given the strategic gateway location and emerging context in the wider area. The variation in massing and stepped forms was deemed to work well with the surrounding context. There was encouragement given to further consider how the proposals would relate to any potential future development to the north.
- The Panel were supportive of all servicing and back-of-house uses being contained to the basement level, allowing the ground floor to provide active uses. The Panel note it will be important to ensure that these spaces can be filled with suitable commercial and community uses and that it could be useful to undertake market testing. The Panel also noted that safety, security and long-term management will need careful consideration.
- The Panel suggested that the balconies on the facades facing the IDR could be recessed or turned into winter gardens. The Panel felt that architectural concept is strong but needs further refinement, particularly at ground level, with more thought given to balconies, shopfronts, pedestrian experience, material reuse and public art.
- The landscape strategy was considered to be positive, especially along the western boundary, and the panel encouraged targets for urban greening, biodiversity net gain and further microclimate assessment.

Public Consultation

- 5.14 The Applicant undertook a public consultation exhibition event on the 7th March 2026. The material from the consultation was made available online and at the exhibition event. Every effort was made to provide a diverse range of formats and methods to enable participation from people of all ages.
- 5.15 Approximately 100 people attended the public consultation exhibition event, with an additional 42 people providing comments on the interactive map online.
- 5.16 In general, the public were in support of the principle of redevelopment with widespread recognition that the existing building is unattractive and underutilised. Responses supported the aspiration of taking a landscape-led approach to redevelop the site.
- 5.17 Full details of the key take aways from the public consultation exhibition are provided in the Statement of Community Involvement.

Wider Stakeholder Engagement

- 5.18 The applicant has also undertaken pre-application engagement with several other key stakeholder groups including the following:
- Meeting with FRAME Design Review Panel - 2nd March 2026
 - Meeting with Civic Society -30th March 2026
 - Meeting with Secure by Design Officer – 1st April 2026

- 5.19 Full details on the content and the design evolution as a response to each of the above engagement activities is provided in the Statement of Community Involvement and Design and Access Statement which both form part of the application submission.

Engagement with McLaren

- 5.20 The Applicant has engaged with adjacent landowner, McLaren, since February 2023, to ensure that insofar as possible a comprehensive approach to the development of the Minster Quarter, in recognition of the need for coordination between sites.
- 5.21 However, it is understood that the progress of the McLaren design development is not progressed to inform conversations focused on design detail. As such, it has not been possible to have workshops with McLaren in which to discuss a scheme which has reached design freeze.
- 5.22 Nevertheless, the design of the Proposed Development has been carefully considered so as to ensure there are no design conflicts with neighbouring schemes and to not prejudice the effective regeneration of the area, including the sensitive delivery of development proposals in the wider Minster Quarter area. The distances between the built form of the Proposed Development and the red line boundary is at least 8m, which when matched by adjacent landowners, will ensure complementary design and high quality public realm.

Environmental Impact Assessment Screening

- 5.23 The Application falls within category 10(b) (Urban Development Projects) of Schedule 2 of the EIA Regulations¹ given that the Proposed Development exceeds the >150 dwellings threshold.
- 5.24 Quod's Environmental Planning Team have requested a Screening Opinion from RBC under Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulation 2017 (as amended) (EIA Regulation) (submitted on 8th April 2026).
- 5.25 A Screening Appraisal was prepared to consider whether the Proposed Development would likely have significant effects on the environment. The Screening Appraisal confirms that across all pathways (construction, transport, townscape, heritage and environmental receptors) the effects of the development are not likely to be significant alone, or in cumulation with other existing or approved schemes. In this context, the development is not likely to give rise to significant environmental effects and does not constitute EIA development.
- 5.26 At the time of submission of this application (end of June 2026), the Council had not provided a response on the EIA Screening Opinion Request.

¹ <https://www.legislation.gov.uk/ukxi/2017/571/schedule/2>

6 Proposed Development

Introduction

- 6.1 This section of the Planning Statement provides an overview of the proposals at the Site. It should be read in conjunction with the wider planning documents.
- 6.2 The application is accompanied by a full set of architectural and illustrative material prepared by JTP which provides a visual explanation of the development proposals and the rationale behind the design of the proposal.

Description of Development

- 6.3 The description of development is as follows:

'Full planning permission for the demolition of the existing building and the erection of a residential-led mixed-use development comprising Use Class C3 residential units, with Use Class E and Sui Generis on the ground floor and with some elements at lower ground floor, plus public realm, hard and soft landscaping, access and servicing arrangements, cycle parking, and other associated works.'

Key Elements of the Development Proposals

Residential Homes

- 6.4 The development includes the provision of 205 Build to Rent (BtR) Homes.
- 6.5 The homes will be arranged across two blocks. 116 homes will be provided within Block A, and a further 89 homes will be provided in Block B.
- 6.6 Block A comprises four elements ranging from 4 to 10 storeys. Block B comprises two elements, at 12 and 16 storeys. The ground floor in both blocks does not comprise any residential homes.
- 6.7 All homes are designed to meet M4(2) standards, with step-free access, adaptable layouts and accessible entrances, ensuring an inclusive living environment. The scheme will deliver 8% M4(3) homes, which will all be located within Block A.
- 6.8
- 6.9
- 6.10

Type	Number of Homes
1 Bedroom 1 Person	11
1 Bedroom 2 Person	69
1 Bedroom 2 Person M4(3)	9
2 Bedroom 3 Person	22
2 Bedroom 3 Person M4(3)	6
2 Bedroom 4 Person	79
3 Bedroom 5 Person	9
Total	205

6.11 Table 3 shows the proposed residential mix for the homes across both Block A and B.

Table 3 Proposed Residential Mix

Build to Rent Residential

6.12 Build to Rent (BtR) is a tenure of residential development designed specifically for longer term renting, with all homes owned and managed by one landlord.

6.13 BtR is recognised in the National Planning Policy Framework (2024) glossary as the following:

Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

6.14 The key difference with BtR properties over more traditionally single unit rental properties is often the facilities they offer and the standard to which they have been built. A key benefit of building purpose-built brand-new apartment buildings is that they are designed to modern, energy-efficient standards and can incorporate the latest technologies.

6.15 Features of the BtR offer include:

- Flexible tenancy, including longer tenancy options of over 3 years and 1 month notice periods, adding security and stability for those looking for longer-term tenancies. This helps to build long-term communities rather than potentially transient renters.

- High quality residential homes and provision of high quality and flexible amenity spaces for use by residents.
- On-site maintenance and 24-hour on site management for residents.

6.16 Reading is considered to be strong location for the BtR residential offer, with a well-established local economy, with representation from a broad range of financial and professional services. Its excellent connectivity and relatively high levels of affordability (based on salary vs rents) lend itself to the BtR market.

6.17 It is recognised that the rental sector is to be subject to change following The Renters' Rights Act, to be effective from 1 May 2026. The detail of the Act is not discussed here but it is noteworthy that the way in which private rental agreements will operate. However, the benefits of BtR will remain. The buildings will be constructed to a high standard, with ongoing maintenance and on-site management ensuring that the high standard stays as such. Communal amenity spaces, including a concierge will be provided, attracting a sense of community and safety.

Ground Floor Use

6.18 The ground floor of the Proposed Development will include non-residential and residential amenity spaces, as discussed below. These will contribute to ongoing activity at the ground level.

Residential amenity uses

6.19 A range of potential mixed ground floor uses are proposed to activate key frontages and create a vibrant, lived-in public realm throughout the day. The ground floor uses could include residents' lounges, gyms, study areas and creative rooms. The exact uses of the ground floor will be determined at the detail design stage.

Non-residential uses

6.20 The non-residential uses will be within Use Class E and Sui generis and may therefore include, shops, cafes or office space. The exact use is not applied for at this time, but will be determined based on the market conditions at the point in time that detailed design is progress. Shell and core is applied for as part of this application only. The non-residential floorspace will comprise c.1,700m².

6.21 An illustrative plan of the distribution of ground floor uses is shown on **Figure 4**.



Figure 4 Mixed Ground Floor Uses

Basement Use

- 6.22 At the basement level, there are a series of uses including building management rooms, such as sprinklers, water tanks and vents, a residential parcel room and a 'Police Room'. The Police Room is to provide a space for Thames Valley Police within the centre of Reading. This will not be for public access but will provide an operational use for the police including vehicle responding, offices, administration or any other ancillary use.
- 6.23 Cycle and vehicular parking is also proposed within the basement, with further detail provided in Section 10.

Access

- 6.24 The pedestrian strategy creates a network of routes to improve footpath legibility through and around the Site. A route will be created through the centre of the Site, via Flint Street. This, and the route along Castle Street, will be flanked by active frontages to create safe walking routes to and from the centre of Reading.
- 6.25 Vehicles will access the Site via the basement utilising the existing access route to the rear of the Site, accessed from the mini roundabout on Castle Street.

Parking, Deliveries and Servicing

- 6.26 The proposal is car free except for 8 Blue Badge holder bays and 4 vehicle parking bays associated with the Police Room. All 12 parking bays will be located within the existing basement, which is accessed by below podium entrance.

- 6.27 The proposal seeks to capitalise on the highly sustainable location of the Site, providing 116 cycle parking spaces across 3 separate secure and covered cycle stores at basement for the residential tenants. Additional secure and covered cycle stores containing 16 cycle parking spaces for the non-residential units will be provided; whilst 4 police cycle parking spaces will be provided.
- 6.28 All deliveries for the residential and non-residential units will take place at the basement level. Refuse collection will also take place at basement level. Delivery and servicing vehicles will be able to access and egress the basement in a forward gear. Full details on the delivery and servicing arrangements for the Proposed Development t are set out within the accompanying Delivery and Servicing Management Plan (DSMP).

7 Planning Policy and Guidance

Introduction

- 7.1 This section provides a commentary of the nature of the development in the context of development plan policy, policy guidance and other material considerations. An assessment of local development plan policy and specific local policy issues are dealt with in Section 8 within this planning statement.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise. The Site is in Reading, and as such the development plan consists of Reading Borough Local Plan (November 2019) and Proposals Map (November 2019).
- 7.3 The development plan should be read in the context of the National Planning Policy Framework (2024) and Guidance which is a material consideration.

Development Plan Overview

- 7.4 The Local Development Plan for Reading Borough Council is formed of:
- Reading Borough Local Plan (November 2019)
 - Proposals Map (November 2019)
- 7.5 The Site is not situated within an area with a 'made' Neighbourhood Plan area.
- 7.6 There are a range of local Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance's (SPGs) that will act as material considerations in the determination of a planning application on the Site. These include:
- Affordable Housing SPD (2021);
 - Design Guide to Shopfronts SPD (January 2022);
 - Revised Parking Standards and Design SPD (October 2011);
 - Planning Obligations under Section 106 (April 2015); and
 - Sustainable Design and Construction SPD (July 2011).
- 7.7 In addition, there are a number of technical documents produced by RBC which underpin the adopted Development Plan, which are considered material considerations to the determination of this application. These are as follows:
- Tall Buildings Strategy (2008); and
 - Western Berkshire Retail and Leisure Study (2017).

Emerging Policy

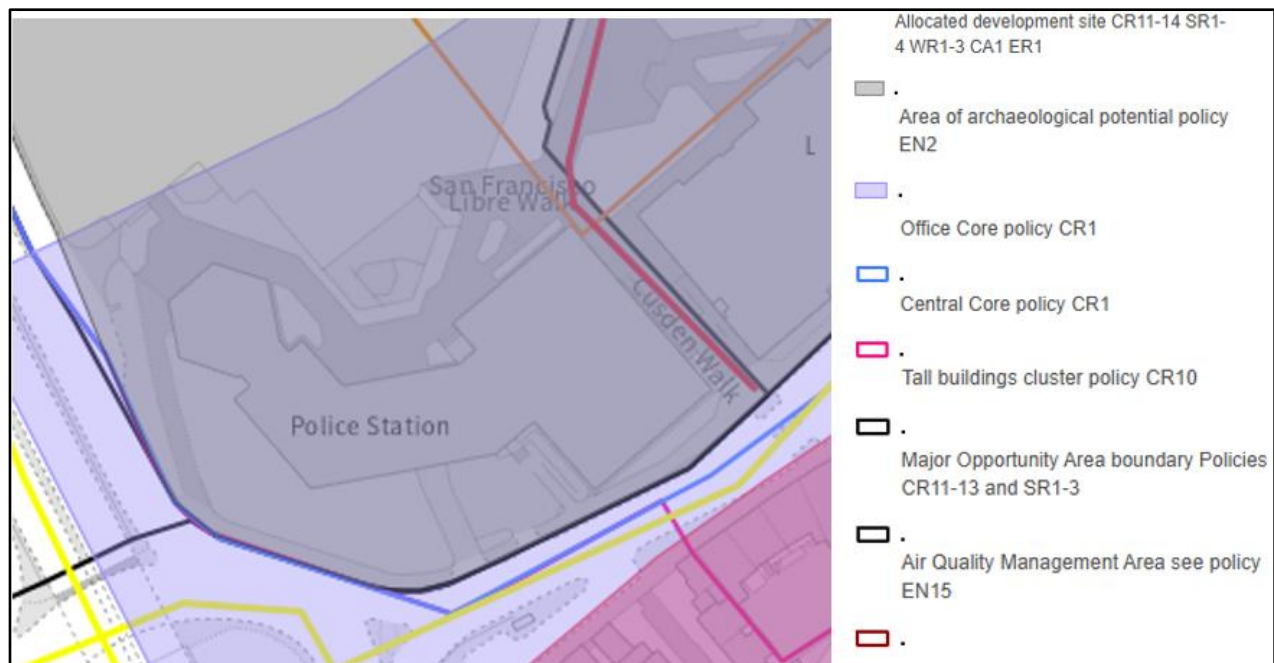
- 7.8 The adopted development plan remains the 2019 Local Plan. However, RBC is now advancing a Partial Update to extend and revise policies to 2041.
- 7.9 The Local Plan Partial Update and Proposals Map were submitted to the Secretary of State for Communities and Local Government on 9 May 2025. Stage 1 hearings took place on the 11th and 12th November 2025, and the Stage 2 hearings were held on 3-6th and 10-12th February 2026. A final hearing session was held on 23rd February 2026 to discuss Matters 3 and 10.
- 7.10 Whilst the Partial Update plan has been submitted for examination, it still only carries limited weight, with the adopted plan (2019) carrying full statutory weight. However, for the purposes of this statement, the policies within the partial update plan have been considered in the internet of completeness.
- 7.11 Within the Partial Update to the Plan, the West Side Major Opportunity Area continues to be allocated for development, with the Site remaining within draft Policy CR12e Hosier Street. The policy continues to allocate the Site and surrounding land for a new residential community, with an indicative potential for 650-970 dwellings and 2,900-4,400sqm of retail and leisure. It recognises the importance of a high quality local environment with improved public open space. The Site is also proposed to be retained in the Tall Buildings Cluster (draft Policy CR10) within which buildings of 12 or more storeys are not inappropriate.
- 7.12 Therefore, clear and strong policy support exists within the adopted and emerging Local Plan.

The Adopted Development Plan

Reading Local Plan

- 7.13 The Reading Local Plan is the Local Development Plan document for RBC.
- 7.14 The Local Plan for Reading is the document that contains the policies for how Reading will develop up to 2036 (the end of the plan period). It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be determined.
- 7.15 For the purposes of considering the Site, an extract of RBC's adopted Proposals Map is provided below. A full analysis of the RBC Local Plan policies and the Proposed Development is set out in Section 8.

Figure 5 - Extract of Reading Borough Council Proposals Map



7.16 As identified in **Figure 5**, the Site is subject to the following designations:

- Allocated Development Site CR11-14
- Tall Buildings Cluster Policy CR10
- Major Opportunity Area Boundary CR11-13
- Air Quality Management Area EN15
- Area of Archaeological Potential Policy EN2
- Office Core CR1
- Central Core CR1

Material Considerations

National Planning Policy Framework (2024)

7.17 The revised National Planning Policy Framework ('the NPPF'), published in December 2024, and amended in February 2025, sets out the Government's planning policies for England and how these are expected to be applied. It replaces the previous version of the NPPF published in December 2023 and is a material consideration in the determination of planning application.

7.18 Paragraph 2 of the NPPF states:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

7.19 The NPPF introduces the presumption in favour of sustainable development. Paragraph 7 of the NPPF states:

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

7.20 As clearly stated at paragraph 11:

Plans and decisions should apply a presumption in favour of sustainable development.

*For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7.21 Section 11 of the NPPF relates to making effective use of land. Paragraph 123 identifies:

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

7.22 Paragraph 124 sets out several objectives for planning policies and decisions including the need to:

Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; 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 converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)

7.23 The central theme of the NPPF is the presumption in favour of sustainable development. It encourages local authorities to approve applications swiftly that are in accordance with the development plan.

Planning Practice Guidance

- 7.24 Planning Practice Guidance ('PPG') is published by the Government to provide further detailed guidance on the application of policies set out in the NPPF. It provides guidance in relation to (amongst other things), decision making, planning conditions and obligations, EIA, the historic and the natural environment, and design.

Draft NPPF (2025)

- 7.25 On the 16th December 2025, the Government published a revised draft of the National Planning Policy Framework (NPPF) and opened a consultation on the proposed changes. The 2025 draft NPPF introduces a clear separation between plan-making policies and national decision-making policies. Some of the key policy changes to the revised draft NPPF are set out below:
- 7.26 Policy S3 of the draft NPPF, which replaces the old paragraph 11 outlines that development within a settlement boundary should be approved unless the negative effects substantially outweigh the benefits of the proposal. Policy S5 also supports housing and mixed-use development that is within a reasonable walking distance (800m) to railway stations.
- 7.27 Policy L1 (Planning for effective use of land) promotes one of the NPPFs new goals: to get the most use out of land in urban and suburban areas, encouraging the redevelopment of corner and other low-density plots, through upward extensions and infill development. This policy also seeks to set minimum residential density standards for town centres and for locations that have a high level of connectivity (Train stations), where this can support more effective land use and extend beyond the requirements of policy L3: achieving appropriate densities.
- 7.28 Policy HO5 sets clearer expectations for accessible housing to meet the needs of older and disabled people. This includes a new national baseline requiring 40% of homes to meet accessible standards, with tenure mix expectations for sites of 150 homes or more.
- 7.29 Whilst the new draft NPPF does not yet carry any weight, it is helpful to see the national direction of travel and increased support for development in sustainable and appropriate locations.

Supplementary Planning Policies and Guidance

Affordable Housing SPD (2011)

- 7.30 The Affordable Housing SPD (2011) provides further guidance to supplement policies in the Reading Borough Local Plan in achieving affordable housing. For BtR proposals, the SPD sets out that, as per policy H4, schemes of ten homes or more, 30% of the dwelling will be affordable housing, provided on site, subject to viability considerations.
- 7.31 National and local policy requires that this onsite provision will be in the form of 'affordable private rent'. Affordable private rent is a housing tenure introduced in the NPPF specifically to form the affordable housing element of build to rent developments. As for other forms of affordable housing, it must be at least 20% below local market rents, but the key difference from affordable rent is that it can be provided by the owner of the build to rent development rather than by a Registered Provider.

[Design Guide to Shopfronts SPD \(January 2022\)](#)

- 7.32 The guidance within this document will apply to all shopfronts within Reading Borough, both historic and traditional as well as modern frontage.

[Revised Parking Standards and Design SPD \(October 2011\)](#)

- 7.33 The SPD sets out that within Zone 1 there will be a maximum provision of 0.25 spaces per bedroom with offices requiring a maximum of 1 space per 250 sqm. There is no specific parking requirement for A1 uses. With regard to disabled parking, Section 6 of the SPD sets out that 'when establishing the required level of parking for disabled users it must be remembered that some of these motorists could have the option to switch mode, particular where they have access to high quality bus corridors and routes which tend to feature low floor access buses and other benefits.

[Sustainable Design and Construction SPD \(July 2011\)](#)

- 7.34 This document aims to promote high standards of Sustainable Design and Construction, in order to guide policies, set out in the Reading Borough Local Development Framework Core Strategy.

[Planning Obligations under Section 106 \(April 2015\)](#)

- 7.35 This Guidance sets out the Council's approach towards seeking planning obligations, alongside the introduction of the Council's Community Infrastructure Levy (CIL) Charging Schedule.

[Tall Buildings Strategy \(2008\)](#)

- 7.36 This strategy informed the development of a tall buildings policy and of specific guidelines for individual sites and areas.

Minster Quarter Area Development Framework

- 7.37 The Minster Quarter Area Development Framework (2018) ('the Framework') recognises the importance of the Minster Quarter Area as a crucial area for Reading. It promotes a major mixed use scheme in the heart of Reading. The Framework sets out a vision for the future development and recommended public realm improvements. It is designed to inform future planning applications rather than to set blueprints.
- 7.38 The Former Thames Valley Police Station is located within the Framework area, in an area defined as the Hexagon Quarter. The Framework sets that the Hexagon Quarter will be largely driven by residential development with mixed uses at the ground floor. It promotes a primarily car-free community and tall buildings.
- 7.39 The Framework includes indicative phasing in Chapter 7 but recognises that the site is complex. It is not unreasonable that the anticipated sequencing may follow a different order, as land promotion and site readiness takes places at different speeds.
- 7.40 The Applicant is aware of emerging proposals within the Minster Quarter and continues to engage with other landowners to ensure that at such a time that other parts of the Framework

area are ready to come forward, they are not detrimentally affected by the Proposed Development.

- 7.41 It is pertinent to recognise that the Framework area will necessarily come forward in stages and that the Framework does not prohibitively prescribe the way in which that should happen. Paragraph 1.2 of the Framework states:

“It [the Framework] indicates one possible way of developing the site in accordance with those planning policies, subject to further more detailed consideration. However, the site could be developed in different ways. This framework does not prevent alternative layouts and forms of development subject to demonstrating compliance with relevant planning policies.”

- 7.42 Indeed, paragraph 4.4 of the Framework recognises that *“it is likely that the Magistrate’s Court and Police Station may come forward at different stages”*. Whilst it was anticipated that the Former Police Station may be redeveloped later than other elements, this should not preclude the opportunity of the redevelopment of a neglected part of the Framework Area, providing much needed residential units for Reading.
- 7.43 Furthermore, paragraph 3.1 of the Framework makes clear that there is an urgent need for improvement to much of the public realm within the Framework area. Therefore, it is critical that opportunities to make any improvements are not unduly delayed.

8 Principle of Development

Introduction

8.1 The following sections of the Planning Statement assess the Proposed Development in the context of the relevant policies within the Development Plan, as well as other material considerations. For each topic, relevant policy and guidance are summarised first, followed by an assessment of the Application. The planning assessment is structured as follows:

- Principle of Development;
- High Quality Design;
- Highways, Access and Parking;
- Built Environment; and
- Sustainability and Green Infrastructure.

Principle of Development

Policy and Guidance

National Policy

- 8.2 At the core of the NPPF is a presumption in favour of sustainable development. This prescribes that applications should be approved without delay where they accord with an up-to-date Development Plan, unless material considerations indicate otherwise (**Paragraph 11**).
- 8.3 **Paragraph 8** of the NPPF defines sustainable development as comprising three overarching and interdependent objectives: economic, social and environmental. The NPPF advises that these roles should not be taken in isolation and that all three objectives are required to achieve sustainable development.
- 8.4 **Paragraph 61** of the NPPF confirms that LPAs should support the Government's objective of significantly boosting the supply of homes. It also confirms that it is important that a sufficient amount of land can come forward to ensure the needs of groups with specific housing requirements are addressed. **Paragraph 62** makes clear that strategic policies should be informed by a local housing need assessment to determine the minimum number of homes needed.
- 8.5 **Chapter 7** of the NPPF makes clear that planning decisions should support the role that town centres play at the heart of local communities. This means taking a positive approach to their growth.
- 8.6 The NPPF offers clear support for the effective use of land, particularly brownfield land. **Paragraph 125** notes that planning decisions should *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused"*. Proposals on such land should be approved unless doing so would result in "substantial harm".

Local Policy

8.7 **Local Plan Policy CR12 (West Side Major Opportunity Area)** outlines the Council's approach to development in the West Side Major Opportunity Area, which will:

- i) *Contribute towards providing a mix of uses including residential. Development for education will be an acceptable part of the mix;*
- ii) *Help facilitate greater pedestrian and cycle permeability, in particular on key movement corridors and east-west links through the area and between development areas and the station, including improved crossings of the IDR where achievable;*
- iii) *Safeguard land which is needed for mass rapid transit routes and stops;*
- iv) *Provide additional or improved areas of open space where possible, generally in the form of town squares, and provide additional green infrastructure where possible;*
- v) *Give careful consideration to the areas of transition to low and medium density residential and conservation areas and conserve and, where possible, enhance listed buildings and conservation areas and their settings;*
- vi) *Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;*
- vii) *Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space; and*
- viii) *Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required.*

8.8 CR12e Hosier Street is the site-specific allocation for the Site and states:

Development on this site will result in a new residential community centred around an improved area of public open space and a high quality environment, with an improved entrance to the site from St Mary's Butts. The edges of the open space will be activated with retail, leisure and/or other main town centre uses such as hotel use, and development may also include some limited offices uses. The Hexagon theatre will only be developed if a replacement facility for Reading, expected to be in the same area, is provided, and approaches to the theatre will be improved. Development will also include a replacement site for the street market. The car parking below ground level will be retained and incorporated into the development.

8.9 Site-specific allocation CR12e includes an indicative potential of between 500-750 dwellings and 4,000-6,000sqm of retail and leisure space.

8.10 **Local Plan Policy H4 (Build to Rent Schemes)** outlines that planning permission will be granted for developments of self-contained, private rented homes which:

1. *Are secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met; and*
2. *Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and*
3. *Provide a high standard of professional on-site management and control of the accommodation; and*
4. *Provide a commitment to high-quality rental arrangements, through meeting Reading Borough Council's voluntary Rent with Confidence Standards or equivalent measures; and*
5. *Provide for a mix of unit sizes in accordance with Policy H2 or CR6; and*
6. *Meet the standards of design set out in Policy H5; and*
7. *Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.*

8.11 **Local Plan Policy H1 (Provision of Housing)** notes that provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.

8.12 **Local Plan Policy H3 (Affordable Housing)** seeks to ensure that residential developments make appropriate contributions towards affordable housing. On site of 10 or more dwellings, 30% of the total dwellings will be affordable, with financial contributions being negotiated to make up the full requirements as appropriate.

Assessment

8.13 The principle of development is supported at both a national and local level. The Proposed Development makes a highly significant contribution to each of the three overarching objectives for sustainable development set out in Paragraph 8 of the NPPF. A summary of these contributions is set out below.

- **Economic Objective:** The Site will include the delivery of a significant quantum of new homes, which will provide new housing opportunities for both existing and future residents of Reading. This could include people who currently work within Reading but have been unable to rent a home. Therefore, the proposals will assist in the retention of a workforce in Reading. The Proposed Development includes commercial uses at ground floor and thus will help deliver additional employment opportunities in the Minster Quarter Area and Reading Town Centre, contributing to the economic success of the area.
- **Social Objectives:** The Proposed Development will deliver modern BtR homes to contribute to meeting Reading's unmet housing needs and provide much needed affordable housing (30% affordable homes). The BtR homes will be accompanied with

communal amenity spaces, including a gym, concierge and commercial uses like a café, which often helps attract a sense of community and safety.

- **Environmental Objectives:** The redevelopment of the Site will be a landscape-led scheme that focuses on providing an enhanced public realm strategy. A minimum of 10% net gain in biodiversity will be achieved. The redevelopment will remove the existing building which is often cited as an 'eyesore' and therefore damaging to the visual amenity of the area.

- 8.14 The Proposed Development is located on a vacant, brownfield site, for which there is strong national policy support for redevelopment. The Proposals will make efficient use of a town centre location, providing much needed housing and community uses.
- 8.15 The Site is located in the Minster Quarter Area, a significant development opportunity for a major new mixed-use scheme in the heart of Reading. The area is identified for improvement and regeneration through the mixed-use development of various sites, including the Application Site. This, along with Policy CR12 further establishes the principle of development at the Site.
- 8.16 The Proposed Development complies directly with the site-specific allocation CR12e and will provide a mix of uses including residential, as well as complying with the policies of the Reading Local Plan as a whole.
- 8.17 Aside from the adopted site allocation, it is important to recognise the current unmet housing need in Reading, which the Proposed Development will go some way to contribute to. RBC is only able to demonstrate 3.43 years' of housing supply, falling short of the required five years, therefore demonstrating there is an urgent need for homes within the Borough. Further, the Site will contribute significantly to the delivery of affordable housing and will meet the policy requirement of 30% affordable housing. This will deliver 62 affordable BtR homes over the lifetime of the development.
- 8.18 The Proposed Development will include space for non-residential uses at the ground floor. The occupiers of the units will be established later on, but it is likely they will comprise retail and food/ beverage outlets and a convenience food store. These uses are entirely consistent with town centre uses and the principle of this is established at a local level. The provision of a convenience food store responds directly to feedback heard at the public consultation events. This was cited as a use class which was found to be lacking in the local area. Non-residential floorspace will provide an economic benefit to the area, not only encouraging local spend but providing employment opportunities too.
- 8.19 The principle of development is therefore considered to be established and in accordance with national and local planning policy. The delivery of the Proposed Development will provide significant benefit to the housing supply, including affordable housing, within Reading, in the context of a local planning authority that is not able to demonstrate a five year housing land supply.

Retention and Redevelopment

Policy and Guidance

National Policy

- 8.20 **Paragraph 161** of the NPPF encourages the conversion of existing buildings to assist in the reduction of greenhouse gas emissions.

Assessment

- 8.21 Consideration has been given to the feasibility of the retention of the existing building and potential conversion. However, the footprint, unsafe condition and structure of the existing building render it unviable for residential use.
- 8.22 Where possible, opportunities will be utilised to reuse elements of the exiting building following its demolition, either on Site as part of the construction process, or off-site.
- 8.23 Demolition of the existing building also facilitates the inclusion of a well designed public realm and landscaping scheme, along with other supporting infrastructure.
- 8.24 Whilst the conversion of the existing building is not appropriate for the Proposed Development, as set out elsewhere in this Planning Statement, sustainable design and construction, including the consideration of energy and low carbon, have been central to the designs. Therefore, Paragraph 161 of the NPPF has been sufficiently explored and the Proposed Development seeks to reduce greenhouse gas emissions during operation to a degree which accords with current Building Regulations.

9 High Quality Design

Design and Public Realm

Policy and Guidance

National Policy

- 9.1 **Chapter 12** of the NPPF relates to achieving well-designed places and states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 9.2 **Paragraph 139** of the NPPF states that significant weight should be given to development which reflects local design policies and government guidance on design.

Local Policy

- 9.3 **Local Plan Policy CC7 (Design and the Public Realm)** states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 9.4 **Policy CC7** goes on to state that developments will be assessed to ensure that they:
- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
 - *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
 - *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
 - *Are visually attractive as a result of good high quality-built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*
- 9.5 **Local Plan Policy CR2 (Design in Central Reading)** states that developments within Central Reading should demonstrate that they build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces. It requires that development will provide appropriate, well designed public spaces utilising high quality and well-maintained hard and soft landscaped areas and public art that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas.

Assessment

- 9.6 The Proposed Development represents a high-quality design approach for the Site, which accords with the design principles set out in Policy CC7. These principles are considered further in the Design and Access Statement which clearly demonstrates that the development responds to the character and appearance of the area of Reading in which the Site is located.
- 9.7 Given the Site's location within central Reading, Policy CR2 is relevant. A detailed consideration of the design attributes identified in Policy CR2 is outlined within the Design and Access Statement, but in summary the Proposed Development will:
- Respect the structure of the Central Reading area and will provide appropriate relationships between buildings and spaces, including frontages which actively engage with Castle Street. The Site's layout, including the creation of Flint Street, to act as a 'gateway' to Reading town centre from the east will enhance ease of movement and improve connections and contemporarily reflect the 'grid' layout structure.
 - Incorporate a comprehensive landscape-led public realm strategy, informed by extensive dialogue with Officers at RBC and feedback from FRAME DRP. The resultant public realm strategy will deliver well-designed and improved public realm, providing high quality hard and soft landscaped areas which enhance the sense of place.
 - Draw on the rich and varied character of Reading town centre and the historic character of Castle Street. The Proposed Development design draws upon detailing and materials surrounding the Site, with the inclusion of rhythmic proportions, horizontal banding and contrasting brickwork detailing and tone above windows.
 - Be designed to complement, rather than compete with future development within the Minster Quarter Area and Broad Street Mall. This has been designed into the proposals such that there is a sufficient gap between the edge of the proposed built form and the site boundary. It is expected that any development proposed within the wider Minster Quarter Area would match that gap, thereby resulting in a distance of at least 15.5m between the nearest building to the Flint Street development.
 - The route of Flint Street through the centre of the Proposed Development will provide a safe and legible route through the Site, improving significantly on the existing situation, with confusing levels, dark corners and unmaintained routes.
 - The Site will be a much more accessible and inclusive environment than at present, with the levels rationalised and the surface treatment more conducive to all user groups.
- 9.8 As set out in Section 5 of this Planning Statement, the Applicant met with FRAME DRP for a positive session, reflective of the high quality of the design proposed.
- 9.9 Together, these points demonstrate that the Proposed Development accords with **Policy CR2**.

- 9.10 A meeting took place with the Thames Valley Police Designing Out Crime Officer in April 2026. The Officer was generally supportive of the proposals and asked the Applicant to further consider whether the residential cycle parking could be moved from the basement to the ground floor. This has been considered but it was concluded that the active frontages of the commercial elements on the ground floor constituted a really important element of the scheme.
- 9.11 Whilst the residential and non-residential cycle stores will be therefore located in the basement, they will be separated with separate access fobs, thereby maximising security. The active frontages at ground floor provide natural surveillance opportunities to enhance security at a ground level. This is in accordance with **Policy CC7**.
- 9.12 A high-quality public realm and landscape strategy will be achieved across six Character Areas that comprises the Site. The public realm provision is thoughtfully considered to offer a range of benefits for both residents and visitors, supporting multi-generational use and creating a vibrant, inclusive environment. Detail of each of the areas of the public realm character areas is set out in the Design and Access Statement. These areas offer an opportunity to define different areas for different characters or activities, and to provide variety within the development. This is in accordance with **Policy CC7**.

Massing, Density and Scale

Policy and Guidance

Local Policy

- 9.13 **Local Plan Policy CR10 (Tall Buildings)** outlines that in Reading, tall buildings are defined as 12 storeys of residential (equating to 36 metres tall) or above. It stipulates that tall buildings will only be appropriate within certain, defined areas. This includes an area identified as 'CR10b: Western Grouping', within which the Site is located.
- 9.14 **Local Plan Policy CR10** wording on the CR10b: Western Grouping states the following:

A secondary cluster of tall buildings would be appropriate to create a distinctive grouping, to mark the area as the civic heart of Reading and a gateway to the centre.

Tall buildings in this area should:

- *Contribute to the development of a cluster of tall buildings that is clearly subservient to the Station Area Cluster;*
- *Be generally lower in height than the tallest buildings planned for the Station Area Cluster;*
- *Be linked to the physical regeneration of a wider area and should not be proposed in isolation;*
- *Where buildings are to be integrated or front onto existing streets, include upper storeys of the taller structures that are set back from a base which is in line with the general surrounding building heights, particularly where the structure adjoins a conservation area;*

- *Not intrude on the key view between Greyfriars Church and St Giles Church, and a view from the open space in the Hosier Street development to St Mary's Church.*

- 9.15 Supporting text to Policy CR10 makes clear that proposals for tall buildings must have regard to effects on the microclimate.
- 9.16 **Local Plan Policy H2 (Density and Mix)** outlines that the appropriate density of residential development will be informed by the character and mix of uses of the area; its current and future level of accessibility by walking, cycling and public transport; the need to achieve high quality design; the need to maximise the efficiency of land use; and the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- 9.17 **Local Plan Policy H2** sets out that at 'Town Centre' locations the indicative density range is above 100 dwellings per hectare, while for an 'Urban' location it is between 60-120 dwellings per hectare. The areas are not defined but it is assumed that given the Site is within the 'Central Core' Policy (CR1), the Site is within a 'town centre' location, where a density of over 100 dwellings per hectare is appropriate.
- 9.18 **Local Plan Policy CC6 (Accessibility and the Intensity of Development)** outlines that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.

Assessment

- 9.19 The Site has the potential to become the 'gateway' point to Reading town centre from the west. Tall buildings at the Site could provide a landing point to the Minster Quarter Framework Area and the wider Reading town centre. The Site is located within Western Grouping; one of the areas within Reading where tall buildings will be appropriate.
- 9.20 The massing and scale of the Proposed Development has evolved throughout the design process to respond to the surrounding context, creating a clear hierarchy across the Site. The height of the tallest elements, namely Block B have been reduced from 14 and 20 storeys to 12 and 16 storeys. Block A will be the lowest element at 4-storeys and will be setback significantly from the street edge, assisting with a sensitive scale transition from the south across the framework area, for which considerable intensification is supported. This will visually reduce the scale of the built form from Castle Street and the Almshouse view, when compared to the mass of the existing 5 storey former police station. This responds positively to the surrounding historic context and creates a visual interest to the design. The FRAME DRP group and the pre-application response from RBC recognises that the proposed scale of the buildings is not inappropriate in this area.
- 9.21 The approach to the layout of the taller buildings has been determined by positioning the taller elements closest to the IDR and closest to the town centre. The height steps down towards Castle Street and adjacent residential areas to reflect the finer urban grain and more sensitive heritage setting. In the context of the above, it is considered that the massing and scale of the Proposed Development comply with the design criteria set out in both national and local policy.
- 9.22 The Site is located within the West Side Major Opportunity Area (Policy CR12) and specifically identified as CR12e 'Hosier Street'. The West Side Major Opportunity Area is recognised as

being able to form an extension to the west of the town centre, containing a mix of uses. The residential and non-residential floorspace figures in the policy are recognised as being 'indicative' (paragraph 5.4.15) and that development capacity can vary significantly on high density town centre sites. The supporting text to the policy also recognises that careful treatment will be needed to respond to the nearby Conservation Areas and listed buildings. It is in this context that the scale and massing of the Proposed Development has been determined and is reflective of the historic scale of development on the south side of Castle Street. This accords with **Policy CR12e** (and the wider CR12 policy as a whole).

- 9.23 Across the Application as a whole, the Applicant has sought to deliver a genuine mix of home types to achieve a balanced community which is informed by a number of considerations, including viability and the unique circumstances of the Site.
- 9.24 The proposed housing mix, as shown in **Table 4** is in accordance with Local Plan Policy H2 which requires a mix of dwelling types and sizes. The supporting text to Policy H2 makes it clear that much of the housing need in Reading will be met in the town centre and this is likely to be formed of smaller home sizes, with a subsequent reliance on out of centre development sites to deliver family sized homes. The proposed housing mix for the Site is reflective of this and provides predominately small home sizes, to ensure an efficient use of town centre, brownfield land.
- 9.25 The mix of homes types remains a significant benefit of the Proposed Development, providing a range of home sizes to cater to unmet housing needs in Reading.

Table 4 Summary of home mix

Home Size	Quantity	Percentage
1 bed	89	43%
2 bed	107	53%
3 bed	9	4%
Total	205	100% (all rounded)

- 9.26 The density of the Proposed Development is 325dph which accords with Policy H2. It utilises a vacant brownfield, town centre Site and makes efficient use of the land in doing so, delivering 205 homes. As outlined later on in this Planning Assessment, the Site is in a highly accessible location, and therefore in accordance with **Policy CC6**, the Site is appropriate for higher density development.
- 9.27 A Wind Microclimate assessment has been submitted alongside this application. This assesses how local wind conditions are altered by new developments. The Assessment found that current wind conditions at the site comply with relevant safety criteria for pedestrians. The Assessment then considered the Proposed Development *without* mitigation measures and

found that wind conditions would be generally compliant with Lawson safety criteria. Minor exceptions were noted at the terrace on Level 12 and two balconies above Level 12. Once mitigation measures were implemented in the model, including the relocation of the two balconies, wind conditions were found to satisfy the safety criteria.

Daylight, sunlight and overshadowing

Policy and Guidance

National Policy

- 9.28 **Paragraph 130 of the NPPF** states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:

“c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”.

Local Policy

- 9.29 **Local Plan Policy CC8 (Safeguarding Amenity)** states that development will not cause detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of access to sunlight and daylight and visual dominance and overbearing effects of a development.

Assessment

- 9.30 To accompany this submission, DPR have prepared two Daylight and Sunlight assessments. The first assesses the potential daylight and sunlight effects of the Proposed Development on existing neighbouring properties. The second assesses the internal daylight and sunlight provisions to the new dwellings and amenity spaces within the Proposed Development.
- 9.31 The Site is located in the south-west corner of the Minster Quarter Development Framework masterplan. The masterplan has not been considered within the assessments due to insufficient information to enable a robust and realistic representation of the scheme. Any assessment undertaken at this stage would therefore be speculative and unlikely to accurately reflect the form and parameters of the Minster Quarter masterplan as it evolves.

Impact on surrounding daylight and sunlight

- 9.32 The proposed development was assessed for its impact on neighbouring daylight and sunlight using BRE guidance, which is advisory and to be applied flexibly. The results show very high levels of compliance, with 99% of windows and rooms meeting daylight criteria and all rooms (100%) meeting sunlight targets.

- 9.33 The small number of daylight shortfalls are largely due to low existing baseline conditions rather than significant new impacts, and retained light levels remain typical for a town centre context.
- 9.34 Overall, the development would have negligible effects on sunlight, and no unacceptable impact on neighbouring amenity. It is therefore considered consistent with relevant planning policy.

Internal daylight and sunlight provision

- 9.35 The daylight and sunlight performance of the Proposed Development has been assessed by DPR in accordance with the BRE Guidelines (2022). Said guidelines are advisory and intended to be applied flexibly rather than as strict policy requirements.
- 9.36 A total of 524 habitable rooms across 205 dwellings were assessed. The results indicate a strong level of internal daylight provision, with 75% of rooms satisfying a strict application of the BRE Guidelines. This represents a good adherence to the BRE daylight criteria and typical for a development of this nature.
- 9.37 In terms of sunlight, when considering the rooms with a southerly aspect window, 84% of rooms satisfy the BRE Guidelines. The performance of the proposed amenity spaces is also high, with 80% meeting the BRE sunlight on ground target, and all areas benefiting from good sunlight levels during the spring and summer months when they are most likely to be used. Overall, this level of compliance is typical for a development of this nature and reflects a balanced design approach that optimises site use while delivering an appropriate standard of residential amenity, in line with BRE guidance and planning policy.
- 9.38 Existing residential properties will not be significantly impacted by the Proposed Development. The Proposed Development itself, both internal rooms and external amenity areas, will receive sufficient levels of daylight and sunlight.
- 9.39 In line with **Paragraph 130** of the NPPF, a flexible approach to daylight and sunlight should be applied where a proposal makes efficient use of an otherwise suitable site.
- 9.40 This is particularly relevant here because the Site is identified as suitable for residential development within the Minster Quarter Area Framework and the West Side Major Opportunity Area. Tall buildings are expressly recognised as appropriate in this location, and it is generally accepted that full compliance with daylight and sunlight targets can be difficult to achieve on schemes shaped by the inherent constraints of height, massing and density.
- 9.41 When considered alongside the wider benefits of the scheme, including the efficient use of a sustainable, centrally located site and the delivery of a substantial quantum of housing and on-site amenity, the level of internal daylight and sunlight achieved is considered acceptable.

Inclusive access

Policy and Guidance

National Policy

- 9.42 **NPPF paragraph 135** outlines that planning policies and decisions should ensure that developments *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”*.

Local Policy

- 9.43 **Local Plan Policy H5 (Standards for New Housing)** outlines the following:

New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render the development unviable:

- a. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3)*
- b. On developments of 20 or more new build dwellings, at least 5% of the dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be ‘wheelchair adaptable’ as defined in part M.*

Assessment

- 9.44 The scheme delivers 8% M4(3) homes located within Block A. All homes are designed to meet M4(2) standards, with step-free access, adaptable layouts and accessible entrances, ensuring an inclusive living environment. This exceeds the 5% policy requirement and is therefore policy compliant and a significant benefit of the scheme,

Amenity Space

Policy and Guidance

National Policy

- 9.45 **NPPF paragraph 135** outlines that planning policies and decisions should ensure that developments *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”*.

Local Policy

- 9.46 **Local Plan Policy H10 (Private and Communal Outdoor Space)** states that dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children’s play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Flats will be provided with communal outdoor space, balconies and/or roof gardens.
- 9.47 Supporting justification text for Policy H10 states the following regarding minimum space standards:

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 guide for proposals:

(a) Houses: Useable private outdoor space should be no less than the gross floor area of the dwelling to which it relates (measured externally and including garage space).

(b) Flats outside central Reading:

- 1 and 2-bedroom: 25sq m per flat*
- 3 or more bedrooms: 40sq m per flat*
- Sheltered units: 20 sq m per unit*

(c) Development in central Reading will not always be expected to comply with the standards set above. Open space is nonetheless required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities.

Assessment

- 9.48 The Proposed Development will provide high-quality living accommodation which has access to communal areas and amenity space. All homes are proposed to have a private balcony or terrace. Balconies range from 5sqm to 8sqm, with terraces being between 10-c.18sqm.
- 9.49 Communal areas will be created throughout the Site and will be designed to allow natural surveillance from nearby dwellings and non-residential uses. Boundaries between public and private space will be clearly defined.
- 9.50 In this context the proposed approach to amenity space provision for the BtR homes is considered acceptable.

Noise

Policy and Guidance

National Policy

- 9.51 **NPPF paragraph 198** outlines that planning decisions should ensure that new development is appropriate for its location taking into account of the likely effects on pollution on health, living conditions and the natural environment. In doing so they should:
- a) “Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”.*

Local Policy

- 9.52 **Local Plan Policy CC8 (Safeguarding Amenity)** states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of noise and disturbance.

Assessment

- 9.53 A Noise Impact Assessment (NIA) has been undertaken by RBA Acoustics to assess the noise levels likely to be experienced on the proposed building façade. The NIA also provides acoustic performance specifications such that internal noise criteria can be achieved.
- 9.54 An attended survey to measure noise levels were conducted around the Site between 11:00 to 14:00 on Wednesday 9th July 2025 and between 23:00 on Wednesday 9th July and 02:00 on Thursday 10th July 2025. Three noise measurement locations were picked; namely the IDR, Castle Street and San Francisco Libre Walk.
- 9.55 Analysis of the external building fabric was also undertaken in order to ascertain the required acoustic performance of the glazing and other external fabric elements to achieve the project criteria.
- 9.56 The NIA indicates that the majority of the site is a risk category D, which indicates that internal noise level criteria outlined in Building Regulations Approved Document O will be exceeded when windows are fully open to mitigate overheating.
- 9.57 Noise levels in the podium gardens and the ground level landscaping to the northeast of the development buildings are within the recommended levels of 50-55dBA and thus in line with the guidance within BS8233.
- 9.58 The NIA does show that there would be instances at the lower levels of the buildings, closest to the IDR where amenity areas (balconies) would be subject to noise levels higher than those stipulated in guidelines.
- 9.59 The NIA highlights how mitigation measures including the provision of solid balustrades to the balconies and the provision of acoustic absorption to external surfaces could be implemented to control the noise levels incident on the balcony amenity areas.
- 9.60 Nonetheless, it is considered that the amenity benefits of incorporating balconies into all units as part of the Proposed Development outweigh the assessed noise harm. The Site is identified as suitable for residential development in the context of the Minster Quarter Area Framework and the West Side Major Opportunity Area, and therefore an implied acceptance that there will be noise.
- 9.61 Officers have previously requested that consideration is given to the potential for future complaints from residents in regard to any noise emanating from The Hexagon. The Hexagon is an important cultural feature and future operations need to be borne in mind with the balance of nearby residential uses. The NIA considers that impacts of noise on the Proposed Development from the operation of The Hexagon is unlikely and is considered to be low risk.
- 9.62 It is most likely that the majority of visitors to The Hexagon will access and egress the area towards the town centre and therefore will use routes travelling north, to reach main transport hubs in Reading Town Centre, or the car park. Visitors that may travel south will likely walk via Cusden Walk. The homes in the Proposed Development are elevated above street level, thereby limiting the noise impact of any pedestrians that do walk south from The Hexagon. It is not anticipated that noise from passers by would be high in any event. Further detail is included in Section 7 of the NIA.

- 9.63 The town centre location of the Site is surrounded by an existing range of uses, a range which is likely to expand in the future, as the Minster Quarter Framework Area comes to fruition. As such, some noise is therefore anticipated from the surrounding uses.

Air quality

Policy and Guidance

National Policy

- 9.64 **NPPF Paragraph 199** states:

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

Local Policy

- 9.65 **Local Plan Policy EN15 (Air Quality)** states the following:

Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

i. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:

- *Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;*
- *Whether the development is within, or access via, an Air Quality Management Area; and*
- *whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.*

ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.

Assessment

- 9.66 An Air Quality Assessment (AQA) has been prepared and submitted as part of the planning application. It considers the suitability of the Site and whether there would be any significant air quality impacts as a result of the construction and operation of the Proposed Development.
- 9.67 The AQA confirms that the Site is located within an Air Quality Management Aea (AQMA).
- 9.68 The AQA found that during the construction phase, there is a potential risk of dust emissions due to demolition, earthworks, construction and trackout. The dust emission magnitudes relevant to each construction activity has been assessed in relation to receptor sensitivity. Pre-mitigation, the risk of dust soiling during demolitions, construction and trackout is Medium, whilst that for earthworks is low.
- 9.69 The pre-mitigation risk to human health during construction and trackout is **Low**, whilst that for construction and trackout is **Negligible**
- 9.70 At an operational stage, the AQA found that the proposed use is likely to be acceptable, and that it is unlikely that pollutant concentrations within the Site would exceed the relevant AQO.
- 9.71 As part of the AQA, a construction dusk risk assessment has been completed, within which, specific mitigation has been identified which should be secured through a forthcoming Construction Environmental Management Plan (CEMP). Once effective mitigation is employed, the residual effects of dust from construction activities are expected to be not significant.
- 9.72 Crucially, given that the Proposed Development results in a sizeable net reduction in vehicle movements, there will not be a detrimental impact on local air quality or an increase in pollution levels.
- 9.73 Therefore, the Proposed Development is in accordance with Policy EN15.

10 Highways, Access and Parking

Highway Impact

Policy and Guidance

National Policy

- 10.1 **Section 9 of the NPPF** highlights how transport issues should be considered from the earliest stages of development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.
- 10.2 **Paragraph 115 of the NPPF** states that in assessing applications for development, it should be ensured that:
- a) Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
 - b) Safe and suitable access to the site can be achieved for all users;*
 - c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.*
- 10.3 **Paragraph 116 of the NPPF** makes clear that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impact on the road network would be severe.
- 10.4 **Paragraph 117 of the NPPF** states that development proposals should give priority to pedestrian and cycle movements; address the needs of people with limited or reduced mobility; create safe places with minimal scope for conflicts between different road users; allow for efficient deliveries to take place; and to enable vehicle charging.
- 10.5 **NPPF Paragraph 118** states that all development will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Local Policy

- 10.6 **Local Plan Policy TR1 (Achieving the Transport Strategy)** states that proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies specific projects identified and the local action plans.

10.7 **Policy TR1** goes on to state:

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 provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures.

10.8 **Local Plan Policy TR3 (Access, Traffic and Highway-Related Matters)** sets out that development will only be permitted where the development would not have a material detrimental impact on the functioning of the transport network and the proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists.

10.9 **Local Plan Policy TR4 (Cycle Routes and Facilities)** states:

Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable.

The cycle routes identified in the most up-to-date Cycling Strategy will be maintained, enhanced and added to or extended. Development will not detrimentally affect an identified cycle route. Where opportunities exist, improvements to that route, including the provision of connecting routes, and/or cycling facilities will be sought within developments or through planning contributions.

Assessment

10.10 To support the submission, a Transport Assessment (TA), a Travel Plan (TP) and Delivery and Servicing Management Plan (DSMP) have been prepared by Paul Basham Associates.

10.11 The Transport Assessment demonstrates:

- The Site is very well located to support a range of travel modes, with the town centre location enabling future site users to access a range of amenities on foot or by using public transport services and removes the need to own a private vehicle. The nearest bus stop to the Site is situated directly opposite on Castle Street. Reading Train Station is approximately a 11-minute walk from the Site and provides direct rail services to a wide range of destinations, including Maidenhead (12-minutes), Oxford (23-minutes), London Paddington (23-minutes), Southampton (55-minutes), Bristol Temple Meads (1-hour 10-minutes) and Birmingham New Street (1-hour 30-minutes).
- The trip generation assessment indicates that the proposal will result in a significant reduction in vehicle trips compared to the former Thames Valley Police Station, with a daily reduction of 361 vehicle trips.
- A Framework Travel Plan has been prepared for the Proposed Development, which details how travel to/from the Site will be managed and to promote the use of sustainable modes of transport. A Travel Plan Coordinator will be hired to assist in promoting the use of sustainable and active modes of travel to minimise the impact of

the development and will be responsible for the day-to-day implementation and monitoring of the Travel Plan.

- 10.12 The Transport Assessment concludes the Proposed Development will result in a reduction in vehicle movements against the former use and will promote a predominantly car free development. This will likely result in an improvement to the operation and safety of the local road network. Therefore, the Proposed Development is in accordance with relevant adopted national and local policy guidance and should not be prevented on highways grounds. The promotion of a largely car free scheme and the improvement this results in to local highway safety should be afforded significant positive weight.

Parking

Policy and Guidance

Local Policy

- 10.13 **Local Plan Policy TR5 (Car and Cycle Parking and Electrical Vehicle Charging)** outlines that developments should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 10.14 **Policy TR5** goes on to outline that within communal car parks for residential or non-residential development of at least 10 spaces, 10% of spaces should provide an active charging point.
- 10.15 The Revised Parking Standards and Design Supplementary Planning Document (2011) (Parking Standards SPD) identifies the Site as being within Zone 1. This is recognised as primarily retail and commercial uses with the best transport hubs. The Parking Standards SPD requires that for retail floorspace in Zone 1, parking will be limited to the public parking provided by RBC. For commercial floorspace in Zone 1, a maximum of one car parking space per 250m² of floorspace will be provided. For C3 residential development in Zone 1, 0.5 car parking spaces per 1-2 bed flats, and 1 car parking space per 3+ bed flats are required. Should fewer spaces be proposed, then it would need to be demonstrated that there would be no detriment to highway safety as a result.
- 10.16 The Parking Standards SPD also includes minimum cycle parking standards for residential and non-residential uses. For residential uses, a minimum of 0.5 spaces per 1-2 bed flats and 1 space per 3+bed flats are required. For non-residential uses, the requirements vary depend on use class and floorspace but require 1 space per 6 staff and 1 space per 250-300m².

Assessment

- 10.17 The Parking Standards SPD would result in the requirement of 107 car parking spaces for the flats. The Proposed Development will operate predominantly car-free, with provision made only for 12 car parking spaces, comprising 8 Blue Badge holder bays (all with EV Charging) and 4 vehicle parking bays associated with the Police Room. The predominately car-free approach is appropriate given that the Site is location which is highly sustainable with multiple public transport options within close walking proximity. This has been agreed during pre-application discussions with highways officers at RBC.

- 10.18 The Transport Assessment concludes that there are no inherent safety issues within the vicinity of the Site which would be made worse by the Proposed Development. Indeed, the reduction in car movements as a result of the Proposed Development will likely improve nearby road safety. The reduction in access points on Castle Street and the IDR slip road will also help to improve general road safety.
- 10.19 This is in accordance with Policy TR5.
- 10.20 The Parking Standards SPD would result in the requirement of 113 cycle parking spaces for the residential and non-residential uses combined (as a worst case).
- 10.21 The Proposed Development will provide cycle parking both at grade and in the basement. These will tie in successfully to existing cycle routes along Castle Street and across the IDR.
- 10.22 116 cycle parking spaces will be provided in the basement for the residential homes. These will be in three separate, secure and covered stores. Additionally located in the basement will be 16 cycle parking spaces for the non-residential units and 4 cycle parking spaces for the Police.
- 10.23 13 Sheffield stands are proposed within the public realm, equating to 26 cycle parking spaces, which are likely to be used by visitors, to encourage active travel to the Site. In total, this exceeds the requirements set by the Parking Standards SPD.
- 10.24 The fact that the Proposed Development will be predominantly car free is a significant benefit and will improve air quality in the immediate area, as well as substantially contributing to the move towards sustainable transport measures.

Delivery & Servicing

Policy and Guidance

Local Policy

- 10.25 **Local Plan Policy CC5 (Waste Minimisation and Storage)** outlines that development proposals should promote more sustainable approaches to waste management including the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.

Assessment

- 10.26 Delivery and servicing was originally proposed to take place at street level, at a loading bay(s) on Castle Street. However, during pre-application discussions, RBC expressed a preference for such operations to take place in the basement. Whilst the exact details of delivery vehicles servicing the development will only be known once occupiers have been confirmed, assessments have shown that 'city-size' articulated vehicles can successfully navigate the turning areas within the basement. As such, the approach to delivery and servicing taking place from the basement has been incorporated within the plans.

- 10.27 Refuse collection for all uses will take place once per week within the basement area. Refuse vehicle matching RBC's vehicle dimensions (8.750m length x 2.250m width) can access, turn and exit the basement area in a forward gear appropriately to serve the development site.
- 10.28 In the context of the proposed delivery and servicing strategy outlined within the submitted Delivery and Servicing Management Plan, 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 delivery and servicing terms.

11 Built Environment

Heritage

Policy and Guidance

National Policy

11.1 **NPPF Paragraph 207** states local planning authorities *“should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance... Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”*.

11.2 **NPPF Paragraph 210** identifies:

- a) *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and*
- c) *The desirability of new development making a positive contribution to local character and distinctiveness*

Local Policy

11.3 **Local Plan Policy EN1 (Protection and Enhancement of the Historic Environment)** states that all proposals *will be expected to protect and where possible enhance the significance of heritage assets and their settings the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.*

11.4 **Local Plan Policy EN1** goes on to state that *applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.*

11.5 **Local Plan Policy EN3 (Enhancement of Conservation Areas)** states that *the special interest, character and architecture of Conservation Areas will be conserved and enhanced....Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas.*

11.6 **Local Plan Policy EN5 (Protection of Significant Views with Heritage Interest)** states:

New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. The following views merit special protection:

2. Views northwards down Southampton St from Whitley St towards St Giles Church, St Mary's Church and Greyfriars Church.

11.7 **Local Plan Policy EN6 (New Development in a Historic Context)** outlines that *new development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.*

11.8 **Policy EN6** goes on to state:

When determining planning applications for new development, the following factors will be taken into consideration:

- c. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- d. Sensitivity to historic context;*
- e. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);*
- f. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.*

Assessment

11.9 The Site is within close proximity of a number of heritage assets, the settings of which must be considered as part of this planning application. The Site is located between two conservations areas; St Mary's Butts and Castle Street to the south and Russell Street and Castle Hill to the west. Further east is Market Place and London Street Conservation Area.

11.10 On the south side of Castle Street is a series of Grade II and Grade II* Listed Buildings, forming part of the St Mary's Butts and Castle Street Conservation Area. Within the Russell Street and Castle Hill Conservation Area are a series of Grade II Listed Buildings and one Grade II* Listed Building. The Church of St Mary is a Grade I Listed Building located almost 300m east of the Site.

11.11 A Built Heritage, Townscape and Visual Impact Assessment ('BHTVIA') has been prepared and submitted as part of the planning application. It considers the impact of the Proposed Development on heritage assets, townscape character and visual amenity.

St Mary Butts and Castle Street Conservation Area

11.12 The BHTVIA finds that the special interest of this Conservation Area is derived from the arrangement, age and varied architectural styles of the surrounding buildings. The Conservation Area Appraisal does not identify any key views looking west onto Castle Street. Indeed, the architectural quality of the Former Police Station relates poorly to the historic streetscape of Castle Street and does not contribute to the character or appearance of the

Conservation Area. The application proposals therefore have the opportunity to repair this arrangement versus the current condition.

- 11.13 It is found that the Proposed Development would preserve all of the key views identified in the St Mary Butts and Castle Street Conservation Area appraisal. Further, the Proposed Development would cause no harm to the special interest of the listed buildings within that Conservation Area either. Overall, it is found that the Proposed Development would enhance the setting of the Conservation Area and make a minor contribution to its overall significance.

Russell Street and Castle Hill Conservation Area

- 11.14 The BHTVIA finds that the special interest of this Conservation Area is derived from its composition of residential properties spanning Georgian, Victorian and Edwardian periods. It notes that the architectural quality of the area has been eroded in some places due to modern development and heavy traffic. Notably, the Site is cited as being distinct from the Conservation Area, and this is reinforced by the separation caused by the IDR, which acts as a significant townscape barrier.
- 11.15 It is found that the Proposed Development would preserve the special interest of the Conservation Area and result in no harm to its character and appearance.
- 11.16 A comprehensive analysis of the Listed Buildings and the contribution of their setting to their significance is set out in the BHTVIA. The majority of listed buildings in the nearby area have been scoped out of the BHTVIA due to there being no or very limited intervisibility between the listed building and the Proposed Development.
- 11.17 The BHTVIA considers four townscape character areas and provides an analysis of these, along with attributing them a townscape value rating. The Townscape value of the Civic Centre area, within which the Site is located is rated as 'low'.
- 11.18 A Zone of Theoretical Visibility has been established to consider the potential areas where the Proposed Development may be visible. 14 viewpoint locations have been agreed with RBC during pre-application discussions and the views are representative of the experience of visual receptors within an area.
- 11.19 An assessment was undertaken as part of the BHTVIA to consider the impact of the Proposed Development on identified heritage assets. The assessment concludes that the Proposed Development will not harm any identified heritage assets. In fact, it would provide significant benefits to the urban design, townscape of the area and visual amenity.

Archaeology

Policy and Guidance

Local Policy

- 11.20 **Local Plan Policy EN2 (Areas of Archaeological Significance)** states the following:

Applicants should identify and evaluate sites of archaeological significance by consulting the Historic Environment Record. This will require an assessment of the archaeological impacts of

development proposals to be submitted before the planning application is determined. Planning permission will not be granted in cases where the assessment of the archaeological impacts is inadequate

Assessment

- 11.21 An Archaeological Desk Based Assessment has been prepared and submitted in support of the application. The Assessment reports that the extensive double basement currently in situ (and proposed to be retained) will have severely truncated mounds of the archaeological potential on Site.
- 11.22 The Assessment found that given the high level of truncation of the Site, pre-determination archaeological investigation will not be necessary. This has been agreed with Berkshire Archaeology (advisers to RBC).
- 11.23 An appropriate assessment has been undertaken and therefore **Policy EN2** has been complied with.

Ground conditions and contamination

Policy and Guidance

Local Policy

- 11.24 **Local Plan Policy EN16 (Pollution and Water Resources)** states:

Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.

Assessment

- 11.25 A Phase 1 Desk Study Preliminary Risk Assessment (PRA) has been completed to support the Application. The PRA has identified potential contaminant linkages, generally classified as posing a 'low to moderate' risk. In accordance with Land Contamination Risk Management (LCRM) guidance, this classification indicates that there may be potentially unacceptable risks to human health and controlled waters that require further investigation or assessment.
- 11.26 To address these uncertainties, the PRA recommends that a ground investigation is carried out for geo-environmental purposes, to allow for a more detailed assessment of the identified risks.
- 11.27 During construction, risks to site workers and the environment from potential land contamination can be effectively managed through the implementation of appropriate Risk Assessment Method Statement (RAMS).
- 11.28 The PRA has been undertaken in accordance with Policy EN16

12 Sustainability and Green Infrastructure

Flood risk and drainage

Policy and Guidance

National Policy

12.1 **Paragraph 170 of the NPPF** outlines that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

12.2 **Paragraph 181 of the NPPF** states:

When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

National Policy

12.3 **Local Plan Policy EN18 (Flooding and Sustainable Drainage Systems)** outlines that development will be directed to areas at lowest risk of flooding in the first instance. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding.

12.4 **Policy EN18** goes on to state all major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government's Technical Standards. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing

Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology.

Assessment

- 12.5 A Flood Risk Assessment and Sustainable Urban Drainage Strategy Report has been prepared by Meinhardt and identifies the Site is located in Flood Zone 1 where the probability of river or sea flooding is less than 0.1% (1 in 1000) chance in any given year. Therefore, the probability of tidal or fluvial flooding is assessed as negligible.
- 12.6 Available baseline information taken from the Environment Agency's Surface Water flood map indicates that within the Site there are areas which are at very low risk of surface water flooding. The localised water logging areas are due to lower-level car parking areas under the ground floor podium. The surface water drainage strategy considers surface water runoff management. The solutions proposed ensure that the 100 years rainfall event with 40% climate change in the rainfall intensities, will be accommodated within the Site and therefore prevent potential exceedance flows off-site.
- 12.7 The proposed drainage strategy incorporates sustainable drainage systems (SuDS) features in the form of green roofs, permeable paving and localised raingardens/tree pits at podium level.
- 12.8 The Proposed Development demonstrates accordance to Local Plan Policy EN18 and the requirements of national policy.

Energy efficiency and carbon emissions

Policy and Guidance

National Policy

- 12.9 **Paragraph 166 of the NPPF** outlines that local planning authorities should expect new development to comply with development plan policies on local requirements for decentralised energy supply and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Local Policy

- 12.10 **Local Plan Policy CC2 (Sustainable Design and Construction)** outlines:

Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately efficiently and with care and take account of the effects of climate change.

- 12.11 The Policy also confirms that all major non-residential developments are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible.
- 12.12 **Local Plan Policy CC4 (Decentralised Energy)** states that any development of more than 20 dwellings 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.

Assessment

- 12.13 The design of the Proposed Development has been progressed in line with the energy hierarchy of be lean, be clean and be green.
- 12.14 The design has focused on demand reduction measures initially to create buildings that are as energy efficient as possible, through the use of fabric design and airtight measures. The design also seeks to maximise daylight and useful solar gain, whilst mitigating overheating risk and minimising heat loss. More active measures include mechanical ventilation systems and low energy lighting.
- 12.15 The feasibility of connecting to district energy networks has been considered but there are not currently any existing heat networks in the vicinity. This satisfies **Policy CC4**.
- 12.16 Air source heat pumps have been identified as the suitable solution for low and zero carbon technology. These will be fully electrified and operationally cost effective. The air source heat pump network will provide heating and hot water to the residential areas. It will also provide hot water to the non-residential areas, plus powering a system which will provide heating and cooling to the non-residential areas.
- 12.17 Overall, it is anticipated that the development could achieve a 60% reduction in regulated carbon emissions over Part L of the Building Regulations 2021. RBC also require a cash in-lieu contribution towards offsetting the residual emissions of a development in order to target net zero emissions, as set out in the Sustainable Design and Construction Supplementary Planning Document (2019). This is calculated as £60 per tonne CO₂ over 30 years.
- 12.18 The Proposed Development seeks to achieve operational carbon neutrality over a span of 30 years. This is in accordance with **Policy CC2**. The reduction in carbon emissions of 60% is a significant benefit of the Proposed Development.
- 12.19 The Building Research Establishment's Environmental Assessment Method (BREEAM) is a standardised way of reviewing the environmental impacts of non-domestic buildings. A BREEAM rating is targeted at a design stage and then final certification is achieved once construction is complete.
- 12.20 The non-residential elements of the Proposed Development will be targeting a BREEAM rating of 'Excellent'. The pre-assessment BREEAM score that is targeted for the development is 72.54%, which is equivalent to a BREEAM rating of 'Excellent', for which the target is 70%. This therefore incorporates a small exceedance / buffer above the Excellent rating. This is in compliance with Policy CC2, and represents a benefit of the proposals.

Landscaping, ecology and biodiversity

Policy and Guidance

National Policy

12.21 As of February 2024, a minimum 10% biodiversity net gain (BNG) has been mandatory for major developments. The requirement is set out in Schedule 7A of the Town and Country Planning Act 1990, inserted by Schedule 14 of the 2021 Environment Act.

Local Policy

12.22 **Local Plan Policy EN12 (Biodiversity and the Green Network)** sets out that new development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network.

12.23 **Policy EN12** goes on to state the following:

On all sites, development should not result in a new loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into the development proposals wherever practicable; and*
- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

Assessment

12.24 An Ecological Assessment was undertaken in June 2025 to support the planning application. The Site is not subject to or adjacent to any statutory or non-statutory designations and therefore significant adverse effects are not likely. The Ecological Assessment finds that the Site is effectively devoid of any habitats of ecological interest. Some of the introduced shrubs, modified grassland and trees and to be lost as part of the Proposed Development. However, the landscape proposals for the scheme will introduce new tree planting, green roofs and a podium communal courtyard. Once established, these features may offer new wildlife habitat.

12.25 The Ecological Assessment also reports on the possible presence of wildlife species on Site. In terms of bats, there is no sign of significant use by foraging bats but is used by largely common and widespread bat species as a habitat corridor. The Assessment confirms that a series of bat boxes will be provided on trees within the Site boundary to provide suitable roosting opportunities. A small number of common bird species were recorded during the survey period. The landscape proposals for the scheme could provide new opportunities for foraging and nesting and during scheme refined, consideration can be given to the installation of new nesting opportunities.

12.26 Overall, ecology policies within the Local Plan have been complied with.

- 12.27A BNG Assessment has been undertaken to support the planning application. It has been informed by a habitat survey undertaken in June 2025. There are limited existing opportunities for biodiversity on Site but existing habitats are to be retained wherever possible.
- 12.28 The baseline for developed land; sealed surface and built linear features is 0. There is proposed to be a loss of 0.19 modified grassland habitat units and 0.11 introduced shrub habitat units post development. Individual trees of varying condition are present on Site, and some of these will be retained. Overall, 0.54 individual tree habitat units will be lost post development and these are considered to constitute the highest value habitats on site.
- 12.29 In terms of habitat creation, 0.83 units will be gained through the planting of 67 urban trees. 0.11 units will be gained through the delivery of a biodiverse green roof.
- 12.30 Overall, the on-site net unit change is +0.35 habitat units, and this results in a net percentage change of 19.04%. This exceeds the required 10% BNG requirement by almost 100% which is a substantial benefit for a brownfield, town centre location. This is a significant benefit of the Proposed Development.

Arboriculture

Policy and Guidance

Local Policy

- 12.31 **Local Plan Policy EN14 (Trees, Hedges and Woodlands)** outlines that new development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change.
- 12.32 The Local Plan also makes reference to Tree Preservation Orders. A Tree Preservation Order (TPO) is a legal mechanism used by a local planning authority to protect a specific tree or group of trees from deliberate damage and destruction. This can include felling, lopping, topping, uprooting or otherwise wilful damage. A TPO does not prohibit the loss of trees verbatim, but rather an application must be submitted and approved prior to any works taking place.

Assessment

- 12.33 An Arboricultural Survey Impact Assessment and Method Statement Report ('Arboricultural Survey') has been prepared to support the application.
- 12.34 The 17 existing trees on Site were assessed as part of the survey. There are no Category A trees (high quality) on Site; 13 Category B trees (moderate quality); 3 Category C trees (low quality); and 1 category U tree (in such a poor condition that they are unsuitable for retention) recorded on Site.
- 12.35 Statutory protection via a Tree Preservation Order (TPO) exists for trees T1-T13.

- 12.36 The Proposed Development will result in the loss of 4no. Category B trees, 1no. Category C tree and 1no. Category U tree. This include 4no. trees subject to a TPO.
- 12.37 Tree protection measures will be implemented to make sure that the retained trees are not impacted as part of the construction works for the Proposed Development. The tree protection measures will safeguard the amenity value and canopy cover for the retained trees.
- 12.38 Mitigation for the loss of the 5 trees (excluding the Category U tree) will includes replacement planting across the Site. There will be approximately 59 new trees planted across the Site, including 7 new trees to be planted outside the red line boundary, along Castle Street and Cusden Walk, plus a further 8 ‘successional trees’ to be planted as whips. This accords with Local Plan **Policy EN14**.
- 12.39 The proposed tree strategy is included on page 113 of the DAS, which is copied below at **Figure 6**. The grey shows the 10x retained trees; the green shows the 55x proposed trees; the khaki shows the 4x proposed street trees; and the yellow shows the 8x proposed successional trees.



Figure 6 Proposed Tree Strategy

- 12.40 The Arboricultural Survey also includes the measures which must be complied with at all times during construction. This includes tree protection fencing, ground protection, storage of materials, the designation of a precautionary area, landscaping works and installation of utility services.

13 Planning Balance and Conclusions

- 13.1 The benefits of the planning application are extensive and have been set out contextually throughout this Planning Statement, as well as in the Executive Summary. The benefits make clear that the Proposed Development should be considered very favourably.
- 13.2 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, commercial uses and regeneration of a neglected part of the town centre. The proposals can act as a catalyst for the redevelopment of the wider Minster Quarter Framework Area, matching the ambition of the recent Broad Street Mall application.
- 13.3 Accordingly, as part of the 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.
- 13.4 The application is supported by the site specific allocation in the adopted Local Plan, and complies with the relevant policies of the Development Plan. It therefore should be approved without delay.

Appendix 1

Architectural Drawings prepared by JTP

Drawing Reference	Revision	Drawing Name	Scale		For information or approval
DP_01	P1	Demolition Plan - Basement 02 Level	1:200	A1	Approval
DP_02	P1	Demolition Plan - Basement 01 Level (Mezzanine)	1:200	A1	Approval
DP_03	P1	Demolition Plan - Podium Level	1:200	A1	Approval
DP_04	P1	Demolition Plan - Roof Level	1:200	A1	Approval
EX_01	P1	Existing Site Plan	1:200	A1	For information
EX_02	P1	Existing Topo Survey Plan - Basement Level	1:200	A1	For information
EX_03	P1	Existing Topo Survey Plan - Podium Level	1:200	A1	For information
EX_10	P1	Existing Site - Basement Level 02 Plan	1:200	A1	For information
EX_11	P1	Existing Site - Basement Level 01 Plan	1:200	A1	For information
EX_12	P1	Existing Site - Ground Floor Plan	1:200	A1	For information
EX_13	P1	Existing Site - Level 01 Plan	1:200	A1	For information
EX_14	P1	Existing Site - Level 02 Plan	1:200	A1	For information
EX_15	P1	Existing Site - Level 03 Plan	1:200	A1	For information
EX_16	P1	Existing Site - Level 04 Plan	1:200	A1	For information
EX_17	P1	Existing Site - Roof Plan	1:200	A1	For information
EX_20	P1	Existing Site Sections	1:500	A1	For information
S_01	P1	Location Plan	-	A1	Approval
S_02	P1	Proposed Site Plan	-	A1	Approval
SS_10	P1	Proposed Site Sections	1:500	A1	Approval
SP_01	P1	Proposed Sitewide - Basement Plan	1:200	A1	Approval
SP_02	P1	Proposed Sitewide - Ground Floor Plan	1:200	A1	Approval
SP_03	P1	Proposed Sitewide - Level 01 Plan	1:200	A1	Approval
SP_04	P1	Proposed Sitewide - Level 02 Plan	1:200	A1	Approval
SP_05	P1	Proposed Sitewide - Level 03 Plan	1:200	A1	Approval
SP_06	P1	Proposed Sitewide - Level 04 Plan	1:200	A1	Approval
SP_07	P1	Proposed Sitewide - Level 05 Plan	1:200	A1	Approval
SP_08	P1	Proposed Sitewide - Level 06 Plan	1:200	A1	Approval
SP_09	P1	Proposed Sitewide - Level 07 Plan	1:200	A1	Approval
SP_10	P1	Proposed Sitewide - Level 08 Plan	1:200	A1	Approval
SP_11	P1	Proposed Sitewide - Level 09 Plan	1:200	A1	Approval
SP_12	P1	Proposed Sitewide - Level 10 Plan	1:200	A1	Approval

SP_13	P1	Proposed Sitewide - Level 11 Plan	1:200	A1	Approval
SP_14	P1	Proposed Sitewide - Level 12 Plan	1:200	A1	Approval
SP_15	P1	Proposed Sitewide - Level 13 Plan	1:200	A1	Approval
SP_16	P1	Proposed Sitewide - Level 14 Plan	1:200	A1	Approval
SP_17	P1	Proposed Sitewide - Level 15 Plan	1:200	A1	Approval
SP_18	P1	Proposed Sitewide - Level 16 Plan	1:200	A1	Approval
SP_22	P1	Proposed Sitewide - Roof Plan	1:200	A1	Approval
BA_01	P1	Proposed Block A - Basement Plan	1:100	A1	Approval
BA_02	P1	Proposed Block A - Ground Floor Plan	1:100	A1	Approval
BA_03	P1	Proposed Block A - Level 01 Plan	1:100	A1	Approval
BA_04	P1	Proposed Block A - Level 02 Plan	1:100	A1	Approval
BA_05	P1	Proposed Block A - Level 03 Plan	1:100	A1	Approval
BA_06	P1	Proposed Block A - Level 04 Plan	1:100	A1	Approval
BA_07	P1	Proposed Block A - Level 05 Plan	1:100	A1	Approval
BA_08	P1	Proposed Block A - Level 06 Plan	1:100	A1	Approval
BA_09	P1	Proposed Block A - Level 07 Plan	1:100	A1	Approval
BA_10	P1	Proposed Block A - Level 08 Plan	1:100	A1	Approval
BA_11	P1	Proposed Block A - Level 09 Plan	1:100	A1	Approval
BA_12	P1	Proposed Block A - Roof Plan	1:100	A1	Approval
BA_20	P1	Proposed Block A Elevations 1 & 2	1:200	A1	Approval
BA_21	P1	Proposed Block A Elevation 3	1:200	A1	Approval
BA_22	P1	Proposed Block A Elevation 4	1:200	A1	Approval
BA_23	P1	Proposed Block A Elevations 5 & 6	1:200	A1	Approval
BA_24	P1	Proposed Block A Elevations 7 & 8	1:200	A1	Approval
BA_25	P1	Proposed Block A+B Elevations 9	1:200	A1	Approval
BA_26	P1	Proposed Block A Sections AA & BB	1:200	A1	Approval
BA_27	P1	Proposed Block A Sections CC & DD	1:200	A1	Approval
BA_28	P1	Proposed Block A Sections EE	1:200	A1	Approval
BB_01	P1	Proposed Block B - Basement Plan	1:100	A1	Approval
BB_02	P1	Proposed Block B - Ground Floor Plan	1:100	A1	Approval
BB_03	P1	Proposed Block B - Level 01-11 Plan	1:100	A1	Approval
BB_04	P1	Proposed Block B - Level 12 Plan	1:100	A1	Approval
BB_05	P1	Proposed Block B - Level 13-15 Plan	1:100	A1	Approval
BB_06	P1	Proposed Block A - Roof Plan	1:100	A1	Approval
BB_20	P1	Proposed Block B Elevations 1 & 2	1:200	A1	Approval
BB_21	P1	Proposed Block B Elevations 3 & 4	1:200	A1	Approval
SCH_01	P1	Block A - Residential Plot by Plot Schedule	n/a	A3	For information
SCH_02	P1	Block B - Residential Plot by Plot Schedule	n/a	A3	For information
SCH_03	P1	Block A & B - Summary Schedules	n/a	A3	For information

Landscape Drawings prepared by Exterior Architecture

Drawing Reference	Revision	Drawing Name	Scale		For information or approval
25020-EXA-ZZ-01-DR-L-00101	P01	Landscape General Arrangement Plan Level 01	1:200	A1	Approval
25020-EXA-ZZ-06-DR-L-00102	P01	Landscape General Arrangement Plan Level 06	1:200	A1	Approval
25020-EXA-ZZ-12-DR-L-00103	P01	Landscape General Arrangement Plan Level 12	1:200	A1	Approval
25020-EXA-ZZ-GF-DR-L-00100	P01	Landscape General Arrangement Plan Ground Flood	1:200	A1	Approval
25020-EXA-ZZ-RF-DR-L-00104	P01	Landscape General Arrangement Plan Roof Level	1:200	A1	Approval
25020-EXA-ZZ-ZZ-DR-L-00001	P01	Sitewide Landscape Masterplan	1:200	A1	Approval