

BY THE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 4<sup>th</sup> March 2020

**Ward:** Abbey

**Application No.:** 182137/FUL

**Address:** "Broad Street Mall", Broad Street, Reading, RG1 7QG

**Proposal:** Construction of three residential buildings (Use Class C3) ranging in height from 5 to 20 storeys above Broad Street Mall (Site E to provide up to 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, Construction of a 16 storey building on South Court comprising ground and first floor retail(Use Class A1/A2/A3) and residential over upper floors (Use Class C3, Site C 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.

**Date valid:** 14/2/2019

**Application target decision date:** 16/5/2019

**Extension of time date:** 23<sup>rd</sup> March 2020

**RECOMMENDATION:**

Delegate to Head of Planning, Development and Regulatory Services, subject to no new substantive consultation responses by 20th March 2020 and satisfactory wind/microclimate verification, to:

- (i) GRANT full planning permission subject to completion of a S106 legal agreement; or
- (ii) to REFUSE permission should the legal agreement not be completed by 23rd March 2020 (unless officers on behalf of the Head of Planning, Development and Regulatory Services agree to a later date for completion of the legal agreement).

The legal agreement to secure the following:

**Affordable Housing:**

- Provision of at least 42 of the dwellings to be secured as affordable housing.
- Tenure to be Affordable Private Rented, with rents to be no greater than the Local Housing Allowance (LHA).
- Mix of affordable units on site: 10 x 3 bed, 16 x 2-bed and 16 x 1 bed
- Affordable Housing Covenant period - in perpetuity. In the event of a change from Build to Rent tenure all affected Affordable units revert to Affordable Rent tenure with rents set no higher than LHA. The affected units to be offered for sale to a Registered Provider and the Council. In the event that an RP or the Council do not take control of the units an equivalent financial contribution shall be made to the Council to enable AH provision elsewhere in the Borough to be determined by a mutually agreed valuation, or arbitration.
- Service charges - All rents to be inclusive of service charge but exclusive of utility bills and council tax and 'pay for' services - hire of function room etc.

- Assured Shorthold Tenancies offered at 3 years in length. Tenants may opt for shorter tenancy. Include 6 month tenant-only, no fee, break clause (2 month notice)
- Rental growth limited to LHA.
- Nominations agreement to be finalised with the LPA

#### General Build to Rent Provisions

- 20 year minimum as BTR.
- Assured Shorthold Tenancies offered at 3 years in length. Tenants may opt for shorter tenancy. Include 6 month tenant-only, no fee, break clause (2 month notice). [as per NPPG guidance]. Unless otherwise agreed in writing by the LPA.
- Annual statement to RBC, confirming the approach to letting the affordable units, their ongoing status, and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission. [as per NPPG Paragraph: 006 Reference ID: 60-006-20180913]
- Definition and demarcation of all communal facilities on plan. Clarification of nature/function of each to be included in the s106 agreement.

Financial Contribution of £1,092,000 as mitigation to improve the public realm and the setting of the St Marys Butts and Castle Street Conservation Area. Payable prior to commencement of the development and index linked from the date of permission.

(Policy EN3 and National Guidance)

Financial contribution of £633,000 as mitigation to ensure improved capacity at local parks within Abbey Ward, reflective of the substantial increase in residential population. Payable prior to first occupation of any residential unit and index linked from the date of permission.

(Policy EN9)

#### Carbon Emissions

Submission of an as-built assessment to demonstrate that the residential development achieves a minimum of 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, at the latest six months after first occupation, unless a different timescale is agreed with the Council to reflect the characteristics of the development. This assessment will inform the final contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/ tonne over a 30 year period).

(Policy CC2 and CC3)

An Employment Skills and Training Plan (construction phase)

Travel Plan - Provision and operation of a residential travel plan no later than first occupation of the first residential unit. (Policies: CC9)

Management Plan for the operation of the car park, including provision of 22 spaces allocated to new residential units

#### Conditions to include:

- Time Limit - 3 years
- Approved plans
- Development to be in accordance with the phasing plan
- Pre-commencement (barring demolition) (per phase) details of all external materials to be submitted to the LPA (and sample details to be provided on site) and approved in writing with the LPA. Approved details to be retained on site until

the work has been completed.

- Pre-commencement (barring demolition above ground level) programme of archaeological work in accordance with a written scheme of investigation
- Pre-commencement (barring demolition) security strategy (achieving the 'Security by Design' Award) to be submitted / approved / implemented / retained.
- Prior to commencement of works above slab level, a written strategy for access control throughout the three towers be submitted to and approved by the authority. The development (and subsequent access control system) shall be carried out in accordance with the approved details and shall not be occupied or used until confirmation of that said details has been received by the authority.
- Pre-commencement (including demolition) construction (and demolition) method statement, also including a construction and environmental management plan for biodiversity
- Pre-occupation (per phase) vehicle parking spaces provided in accordance with the approved plans
- Pre-residential occupation (per phase) cycle parking provided in accordance with the approved plans
- Pre-occupation (of any use associated with the relevant phase) visitor / commercial bicycle parking - plans to be approved
- Pre-occupation (per phase) bin storage provided in accordance with the approved plans
- Parking permits - pre-occupation (per phase) notification of postal addresses
- Parking permits - prohibition on entitlement to a car parking permit
- Pre-occupation (per phase) car parking management plan for allocation for staff/residents (including tenure breakdown)/visitor and subsequent management of spaces
- Pre-occupation (per phase) delivery/servicing management plan details to be submitted/approved/maintained as such thereafter
- Implementation of approved noise mitigation scheme
- Pre occupation of Block E report to be submitted to demonstrate of sound insulation of adjacent fan to secure 0db over existing background noise levels.
- No development shall commence on site until an Air Quality Mitigation plan shall be submitted to and approved in writing by Local Planning Authority.
- Implementation of approved noise and dust during demolition and construction measures
- Pre-commencement (including demolition) contaminated land site characterisation assessment
- Pre-commencement (including demolition) contaminated land remediation scheme
- Pre-construction contaminated land validation report
- Reporting of unexpected contamination at any time
- Pre-commencement (including demolition) land gas remediation scheme
- Pre-occupation land gas validation report
- Hours of demolition/construction works
- No burning of materials or green waste on site
- No mechanical plant installed until a noise assessment of such plant has been submitted and approved. Maintained as approved thereafter.
- No kitchen extraction installed until an odour assessment and odour management plan has been submitted and approved. Maintained as approved thereafter.
- Pre-commencement arboricultural method statement and tree protection plan (to safeguard existing tree adjacent to the site)
- Pre-commencement (barring demolition) submission of hard and soft landscaping, services, planting plans, tree pit specifications.
- Implementation of approved soft landscaping prior to occupation of relevant phase or a timetable agreed in writing with the LPA.

- Replacement planting for anything that dies within 5 years of planting.
- Pre-occupation submission of a landscape management plan & implementation
- Pre-occupation (per phase) submission/approval/implementation of details of the biodiversity enhancements
- Pre-occupation (per phase) lighting scheme details to be submitted/approved/maintained as such thereafter
- Development in accordance with the FRA hereby approved.
- Pre-occupation (per phase) completion of the approved sustainable drainage scheme. Subsequent management and maintenance in accordance with the approved details.
- No piling or any other foundation designs using penetrative methods permitted other than with the written consent of the Local Planning Authority (consult the EA at the time of submission)
- No infiltration of surface water drainage into the ground permitted other than with the written consent of the Local Planning Authority (consult the EA at the time of submission)
- Implementation of Energy Statement measures
- (i) Pre-commencement (of the relevant part of the development) final design stage BREEAM assessments to ensure that the retail unit within Block C achieves at least a 'Very Good' rating
- (ii) Within 3 months of occupation final BREEAM certificate retail unit within Block C achieving at least a 'Very Good' rating
- No fixing or installing of miscellaneous items to the external faces or roof of any building without the prior approval in writing of the local planning authority
- Ground floor non-residential units shall retain 'active window displays'
- Hours of Operation (Sunday to Thursday: 9:00- 23:00, Last food order: 21:30 Friday to Saturday: 9:00-23:30 Last food order: 23:00)
- Prior to occupation Security arrangements to be submitted, stating measures to secure the A1/A2/A3 units when closed and street furniture to be brought into building.
- Prior to occupation submission and approval of an external lighting strategy
- Details of street furniture to include bins to be submitted and approved prior to occupation.
- Provision of 22 wheelchair adaptable units within the development
- Pre-occupation provision and retention of lifts to Blocks A, B, C and E
- Provision and Retention of amenity deck for Blocks A, B and C and the roof level amenity for Block E.
- Secure refuse storage from vermin
- Thames Water condition

Informatives:

- Positive and proactive requirement
- S.106 applies
- CIL-liable
- Terms and conditions
- Pre-commencement conditions
- Works affecting the Highway
- Fee for conditions discharge
- Building Regulations - noise between residential units
- Thames Water requirements
- Environment Agency requirements

## INTRODUCTION

- 1.1 The 2.42ha application site consists primarily of the Broad Street Mall (BSM); a large shopping centre situated in the south west part of Central Reading, approximately 10 minutes walk from Reading Station. The application site also encompasses the areas of public realm set immediately adjacent to the existing Mall frontages orientated towards Dusseldorf Way (to the south), Queens Walk (to the west), Oxford Road (to the North) and St. Marys Butts (to the east).
- 1.2 The area immediately surrounding the site contains a mix of uses and building heights, styles and time periods. At the time of writing the Eva's nightclub building is set directly to the east of proposed Site C, oriented towards Hosier Street. However, it should be noted that the Eva's site has prior approval for the demolition of the building and planning permission to erect a 7/8 storey hotel. Adjacent to this is a Public House (formerly known as Pavlov's Dog' now The Boundary) a property of townscape merit which is considered to be a non-designated heritage asset; and the existing Army Careers Office. These units are not owned by the applicant and do not form part of the application site. Hosier Street is also a location for Reading Market and contains an existing high-walled electricity substation.
- 1.3 Set further east is St. Mary's Butts, the eastern side of which has a mixed character containing 4/5 storey commercial units with a contemporary appearance (eg Café Nero) and much older gable ended buildings with elements of timber framing with herringbone brick (eg Pizza express). Pizza Express lies within the St. Mary's Butts/Castle Street Conservation Area, which is centred on the Grade I Listed Reading Minster. To the south of Dusseldorf Way (which links Hosier Street to the east, accessible to vehicular traffic) there is existing hard landscaping in the form of pedestrian routes that provide circulation areas and links to Castle Street. This area also contains soft landscaped public space including mature trees formed within large raised planters. These spaces provide separation to the former Civic Office site situated adjacent to the Hexagon Theatre; and the existing Magistrate Court and Thames Valley Police Headquarters fronting Castle Street.
- 1.4 To the west of the site sits the Penta Hotel, Student accommodation (at 15 Queens Walk) and the Hexagon Theatre. These are relatively modern buildings constructed in a range of building materials including concrete, grey metal, red brick and coloured cladding, set within the Inner Distribution Road (IDR). On the western side of the IDR and Howard Street lies the Russell Street/Castle Hill Conservation Area. To the north of the Mall on the opposite side of the Oxford Road retail units are predominantly found at ground floor. No 38 Oxford Road and the 4/5 storey McIlroy Building, set opposite Site E, also contain residential units within the upper floors within buildings constructed in a mix of red and blue/grey brick with buff detailing.
- 1.5 It is important to note the differing man-made land levels within and surrounding the application site. The pedestrian accesses to the BSM entrances on Oxford Road and St Marys Butts are set at ground level. However, the pedestrian access from Dusseldorf Way and Queens Walk are set on a podium which is not natural ground level but accommodates access roads, servicing areas and voids beneath. Within this report this level is referred to as lower podium level. This change in levels is illustrated by the pedestrian entrance to the Hexagon Theatre and community garden on the former civic site that are set at a lower level than Dusseldorf Way and Queens Walk.

- 1.6 In relation to the Mall itself, which is wholly retained within the proposed development, the majority of the original structure dates from circa 1970. The existing 3 storey structure, formally known as the Butts Centre is of brutalist design and is considered to be of limited architectural value where aesthetic improvements are welcomed. It is noted that the southern elevation contains a concrete frieze which is a prominent design feature of the building which is to be retained. Due to the differing land levels within the site the structure contains a large basement at lower ground level that houses plant rooms, the main waste storage area and storage facilities to serve the retail units (situated over the 2 floors above). The Mall also contains a public car park with over 700 spaces split between 3 floors, part first, second and on the existing flat roof. This roof area is referred to as the upper podium level within this report. This public car park is leased to Reading Borough Council and operates 24-hours a day, seven days a week. Vehicular access to basement level for deliveries and servicing, and the car park above, is via Castle Street (south) or Caversham Road (A329) to the west. The Mall also house two further office buildings that exceed the upper podium level in height Fountain House (located on northwest corner) and Quadrant House (located on the southeast corner).
- 1.7 The application site also contains areas of public realm with differing characteristics directly adjacent to the Mall Building. Oxford Road and St Marys Butts formed of a mix of tarmac, grey concrete paving slabs and red brick pavements adjacent to busy vehicular roads on prominent bus routes, with St Marys Butts also housing elements of Reading Market. Queens Walk and Dusseldorf Way are primarily pedestrian routes formed of tarmac and grey concrete paving slabs, with existing vegetation currently only in the form of free standing planters on Queens Walk.
- 1.8 In terms of Local Plan designation the BSM is sited in the Reading Central Area and within the West Side Major Opportunity Area (Policy CR12). The proposal also falls within the Tall Buildings Cluster Western Grouping (Policy CR10b) and is considered within the Council's Tall Building Strategy (Adopted 2008, Updated 2018). The application site additionally forms a major element of the Supplementary Planning Document 'Minster Quarter Area Development Framework' (MQADF) adopted in December 2018.
- 1.9 The application site has a number of other designations, including being located within:
- An Air Quality Management Area
  - the Central Core
  - the Office Core
  - the Primary Shopping Area
  - a Primary Shopping Frontage (orientated towards Oxford Road and St Marys Butts)
- 1.10 With regard to heritage assets the application site is not within a Conservation Area but sits adjacent to the St Mary's Butts/Castle Street Conservation Area and Russell Street/Castle Hill Conservation Area as shown on the plan below.

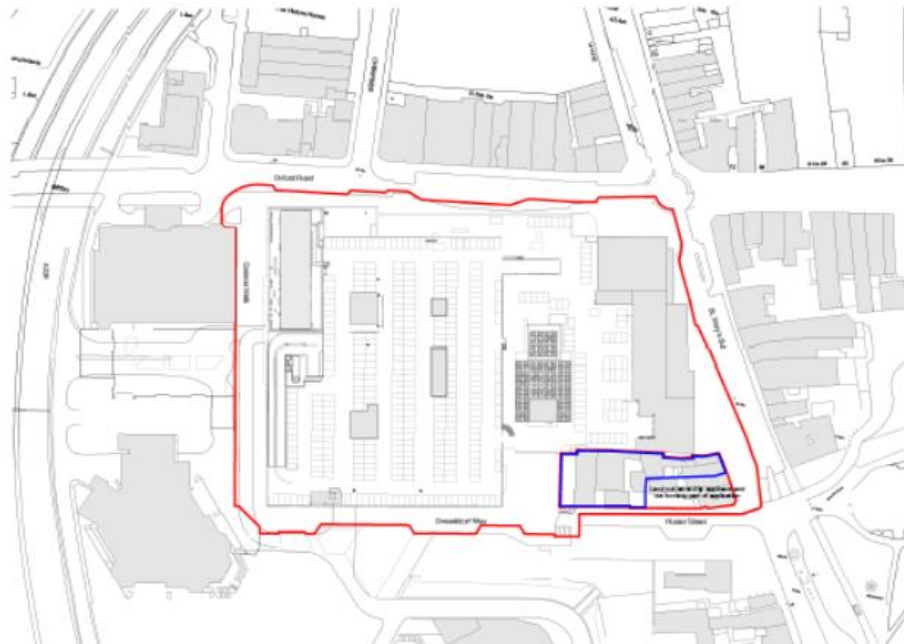
Map to show current Conservation Area Boundaries:



1.11 The St Marys Butts/Castle Street Conservation Area contains a large number of statutory listed buildings (shown with \* above) particularly along Castle Street, including:

- Church of St Mary Reading Minster - Grade I
- Church of St Mary, Castle Street - Grade II\*
- Sun Inn, Castle Street - Grade II
- Former Cottage at rear of No.8 Castle Street- Grade II
- 8,10 & 12 Castle Street - Grade II
- The Allied Arms Inn - Grade II
- 55 & 55A St Mary's Butts - Grade II
- Queen Victoria Jubilee Fountain - Grade II
- Jubilee Cross - Grade II

Location Plan



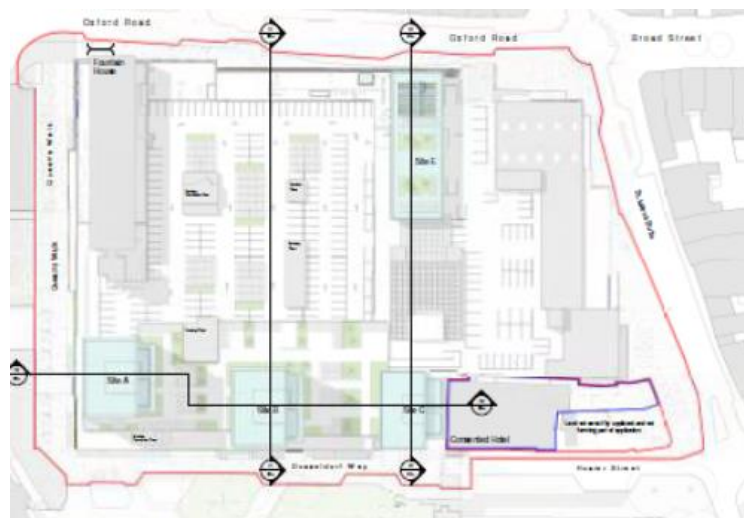
Aerial photograph



## 2.0 PROPOSALS

- 2.1 The application seeks full planning permission for a new mixed use development containing both retail space (circa 1,500sqm) and Build to Rent residential accommodation (up to 422 units). The proposal consists of the erection of 4 residential blocks, with private upper level amenity space, within and above the existing Broad Street Mall adjacent to Dusseldorf Way, Queens Walk and the Oxford Road. At ground floor the proposal seeks the reconfiguration of existing retail floor space to form 4 retail units in a variety of A1/A2/A3/A4 uses. The proposal also includes associated works throughout the mall site to facilitate the new built form and improvements to the public realm on Dusseldorf Way and Queens walk.

Proposed Site Masterplan



- 2.2 As shown above the residential element of the scheme is housed within 4 separate structures inserted within the existing built envelope of the Broad Street Mall. These are referenced as Site A, Site B, Site C, and Site E. Site D



within the original submission has been deleted from the scheme. The position of these structures was determined by the applicant by the areas where the proposals would meet the existing ground level and allow for residential access whilst maintaining an active retail frontage to the Mall.

Proposed Dusseldorf Way Elevation to show Amended Site A, B and C



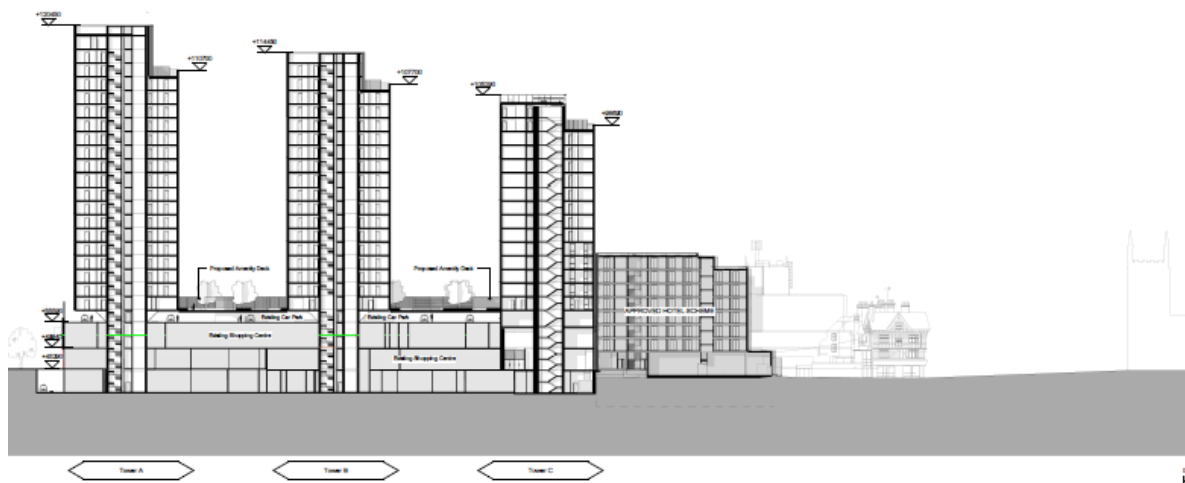
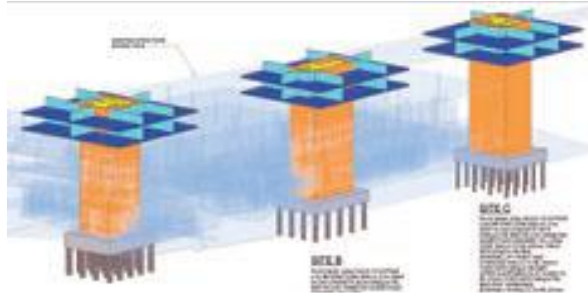
Proposed Oxford Road Elevation to Show Site E (with Amended Site A, B and C to the rear)



- 2.3 In order to erect the residential units within Site A, B and E ‘through’ the existing mall the new structures are proposed to be constructed using ‘Confined space piles’ coming up from the existing basement level. These piles will support each central reinforced concrete circulation core (containing the lift and stairs) which will provide the main support of the upper suspended floors in each block.

Therefore, the residential elements of Sites A and B and the proposed upper level shared amenity area are suspended above the existing roof top car park, which is to be retained.

Diagrammatic illustration of the piles in orange and suspended floors in blue  
 Fig from DAS (2018 point 2.12 Structural Constraints)

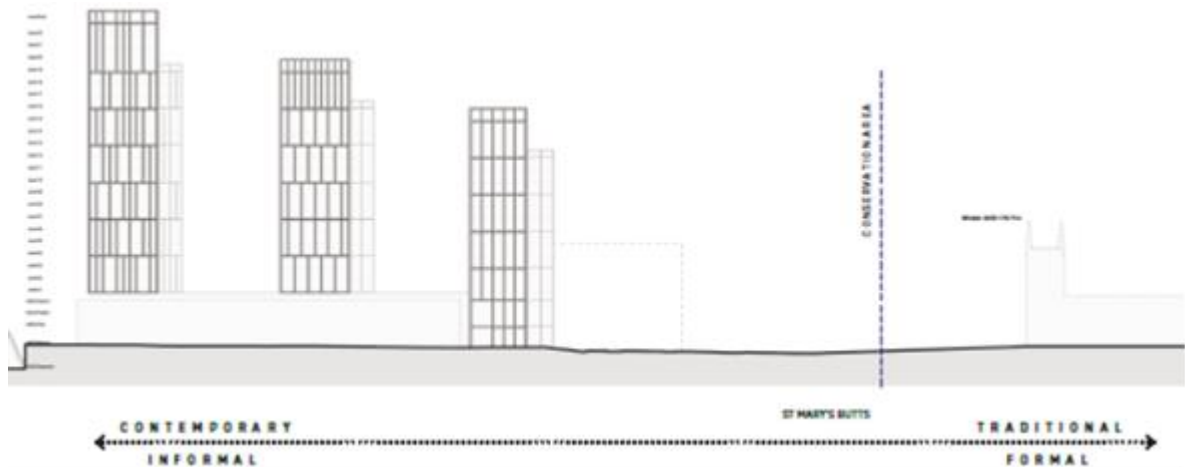


Site section through Dusseldorf Way Elevation

- 2.4 In order to facilitate this reconfiguration at existing lower levels, and new build elements of the scheme, the description of development seeks permission for 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 and other associated works. Amenity space and improvements to the public realm are also sought.
- 2.5 NOTE: In the following sections the term “Above Ordnance Datum (AOD)” is used. For information the AOD level refers to the height of mean sea-level (reference point in Newlyn, Cornwall) and not ground level on site. This is basis of the national height system for Britain.  
**Site A** the tallest of the proposed blocks at AOD+120m with 20 stories of accommodation above the Mall containing 148 residential units (73 x1 bed, 71x 2 bed and 4x 3 bed). This block is located adjacent to the junction of Queens Walk and Dusseldorf Way but is set back 10m from the existing southern elevation of the Mall. The double storey height residential entrance to this block is accessed from Queens Walk. To facilitate construction of the core of the building and the residential entrance, 3 existing units will be refigured with the creation a single 172m<sup>2</sup> retail unit.
- 2.6 **Site B** is set down in height to AOD +115 forming 18 stories of accommodation above the Mall containing 115 residential units (64x1 bed ,66x 2 bed and 4x 3

bed). This block is located adjacent to Dusseldorf Way, the existing southern elevation of the Mall. The double storey height residential entrance to this block is accessed from Dusseldorf Way. To facilitate the construction of the core and the full height residential entrance existing unit 36 and 37 (which have permission to be amalgamated to form a new food court) will be subdivided into 2 units providing fully glazed ground floor retail frontages.

- 2.7 **Site C** although an 18 storey building is set down in height again, to AOD +103, as this building infills the South Court entrance from lower podium level. It contains 98 residential units of accommodation from 2<sup>nd</sup> to 17<sup>th</sup> floor (48x1 bed, 46x2 bed 4x 3 bed). Social space is also located the 2<sup>nd</sup> floor for communal use by residents. This block is located adjacent to Dusseldorf Way adjoining Hosier Street and is set flush with the existing retail frontage. The full height residential entrance to this block is accessed from Dusseldorf Way. As this block is wholly new build the ground floor re-provides an enclosed access to the interior of the existing Mall. One new retail unit is created at ground floor (190m2 retail unit).
- 2.8 **Site E** is AOD 71 in height forming 5 stories of accommodation above the Broad Street Mall orientated towards Oxford Road. This block, as amended, contains 42 residential units (16x1 bed, 16x2 bed and 10x3 bed). The residential access to be provided at ground floor to Oxford Road by utilising existing floor area within the current 'Trespass' retail unit.
- 2.9 In terms of appearance and materiality the scheme has been through a number of design iterations, considered by the South East Design Review Panel and officers, before evolving into the current scheme presented in this report. The tower elements are geometric in form with the eastern side of each structure set down to form a subordinate 'shoulder element' to create a more visually slender building. The submitted DAS sets out that the concept of the materiality of the towers is that they appear as a family of buildings rather than a repetitive, regimented group of blocks. In terms of appearance Sites A, B and C are constructed of metal cladding interspersed with full height glazing with deep reveals to give depth and interest to these elevations. The metal cladding system consist of a primary grid of vertical fins and a secondary layer of metal panels. The application states that metal has been selected as it can achieve a variation in tone and texture to create subtle differentiation across the 'family of buildings'. Metal is also aesthetically lightweight as it is noted there are structural limitations on the weight of the proposed new structures above the Mall. Block C also contains a brickwork cladding system on the lower grounded portion in response to the conservation area, and permitted hotel. The colour palette chosen for the proposed scheme has been inspired by the existing local vernacular which includes red and buff brick along with grey flint.



Elevational treatment fig 4.2 of DAS (note this shows the original height of Site A now reduced)

2.10 Due to the height of the towers the structures are required to have a definitive 'top, middle and bottom'. In order to achieve this the proposed revised materials for the towers include deep window reveals and the introduction of a bespoke laser cut metal panel with the uppermost floors, inspired by the existing concrete frieze of the Broad St Mall car park. Site A the tallest structure, also incorporates inset glazed balconies at first floor.



Block A Typical Bay Elevation

2.11 Block E is not classified as a tall building and its form and appearance differ to the other elements. This block has been reduced in width from the original submission and is constructed of a Terracotta cladding system proposed in light and dark grey tones to reference the existing local vernacular and the brick used in the McIlroy building opposite.

2.12 For the external amenity space for the residential units the proposal provides 2,085 m<sup>2</sup> of private amenity space on a newly created deck above car park level shared by and linking residents of Sites A, B and C. There are additional areas provided on the 'shoulder elements' as roof top terraces associated to individual

flats. The shared space bounded by a 3m glass balustrade seeks to create a series of ‘urban rooms’ containing timber pergola structures, play space, communal seating and planting to create a green outlook to include trees. Site E incorporates a 226 m2 roof top garden for its residents. The communal amenity space is contained by 1.8m parapet also containing timber pergola structures, communal seating and planting.

- 2.13 In relation to the public realm at ground level the proposals seek to activate the Mall frontages by articulating the proposed entrances into the residential buildings; and creating places for pedestrians to “pause, rest and meet.” (DAS). The indicative works to Queens Walk includes resurfacing the area with red brick pavements, and providing street trees and planters to seek to enhance the comfort at street level, by mitigating wind, and providing seating to promote social interaction and places to relax. There will also be integrated cycle parking and replacement of existing street lights.
- 2.14 Dusseldorf Way is seen as an important connection between the Minister and the Hexagon Theatre. The Applicant states “the proposals therefore seek to link these areas through to Hosier Street to bring a consistent finish enhancing navigation of the streets to connect in with the future Minster Quarter Development Proposals” (Landscape DAS). The indicative works seek to resurface the area with red brick pavements, enhance the concrete frieze through “creative light intervention”, with existing street trees to be retained and area of living wall and seating with a large planted bed provided (to cover a solid brick section of wall beneath the frieze). There will also be integrated cycle parking and public seating.
- 2.15 For the car park at upper podium level, visible from the proposed residential units, this is proposed to be enhanced by the introduction of metal pergolas to support green climbing planters and freestanding planters containing evergreen Jasmine climbers and ornamental grasses.

November ‘DAS 2019 Addendum Landscape and Public Realm’ Fig 3.4 Illustrative Master Plan

**The Landscape Proposals**  
 The landscape proposals can be split into five distinctive areas which are identified on the illustrative masterplan (right) and will be discussed in detail in the following sections.

- 1 Queens Walk
- 2 Dusseldorf Way
- 3 The Amenity Deck (Blocks A-C)
- 4 The Amenity Deck (Block E)
- 5 The Podium Carpark



- 2.16 **Car Parking**  
 Given the town centre location of the site no additional car parking is proposed, however 22 wheelchair accessible parking spaces within the existing Broad Street

Mall multi storey car park will be allocated to the development. It is stated there are a total of 787 car parking spaces currently within the multi storey car park with 109 car parking spaces to be displaced to facilitate residential cores, the introduction of accessible spaces and realignment of vehicular routes.

- 2.17 A total of 232 secure cycle parking spaces for resident will be provided within the basement of Broad Street Mall for Blocks A, B and C, whilst secure cycle parking is provided at roof level of the multi-storey car park, immediately adjacent to Block E.
- 2.18 Servicing vehicles will enter the site via the existing basement level accessed from Castle Street in keeping with the existing retail units. Bin stores are located at basement level within the newly constructed retail cores. Building E will have additional service corridors as this Block's bin store is not directly accessible from the existing service road.
- 2.19 During the course of the application a number of changes have been made to the proposals, including the following main changes:
- Block A has been reduced in height by 2 storeys (6 metres overall) with loss of 16 units
  - The number of units Block E has been reduced in order to provide improved unit sizes for individual units in this block
  - Inset balconies have been introduced to the upper floors of Blocks A, B and C to provide articulation and relief to the elevations.
  - Shoulders of Blocks A, B and C have been reduced in height to emphasise the verticality of the buildings.
  - Blocks A, B and C have been revised proposing more slender massing.
  - All north facing single aspect units have been removed.
  - Block D (Quadrant House) has been deleted from the proposals and removed from the planning application.
  - Communal residential amenity deck for Blocks A, B and C have been increased in size and been reconfigured to make better use of the space whilst introducing defensible space around the first floors of the residential buildings.
  - Ground level elevation and base of Block C has been amended to tie in with the existing Broad Street Mall elevation along Dusseldorf Way.
  - Amendments to the materials palette of the public realm and simplifications of the proposals along Dusseldorf Way and Queens Walk.
  - Materiality of Blocks A, B and C have been amended from terracotta cladding to metal rainscreen cladding.
  - Block C shoulder is now brick to accentuate the materiality of the adjacent consented hotel and Conservation Area.
  - Block E elevational treatment has been amended to terracotta cladding from previously tabled brick slip system.
  - Hammerhead to Block E has been removed and overall form rationalised.
  - Block E elevation rhythm redesigned to emphasise horizontality inspired by Fountain House.
  - Inclusion of rooftop communal amenity space for Block E.

#### **Environmental Impact Assessment**

- 2.20 The development is EIA Development as defined under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Revisions to the scheme submitted in November 2019 were accompanied by an Environmental Statement Addendum with relevant chapters updated.

- 2.21 The development would be liable for CIL due to the amount of new floorspace proposed. The Council's CIL Charging Schedule sets a base rate of £120 per square metre for residential floorspace. The rate is index linked from the date of adoption of Schedule, and the current rate for 2020 is £157.18 per square metre. Based on the final amended scheme, supplied by the Applicant, the residential units have a proposed GIA of 30,411 m2 resulting in a CIL figure of £4,780,000.
- 2.22 No cross checking of floor area calculation methodology has been conducted to validate the figures supplied. This cross check will need to be conducted post-decision to ensure that all areas have been assigned to the relevant charging schedule.
- 2.23 The usual caveats apply; the buildings must have been in lawful use and exist on the day that planning permission first allows development. Any relief for Social Housing will need to have annotated plans and supplementary floor areas calculations to validate the amount. This gives an indication of the likely CIL outcomes but is provided without prejudice to further examination of the CIL application by the Council.
- 2.24 This application is reported to planning applications committee because it is a major category application. Members also carried out an accompanied site visit on 21<sup>st</sup> March 2019.

### **3. PLANNING HISTORY**

- 3.1 There have been numerous applications for development within the Broad Street Mall both internal and external to facilitate the use as a shopping centre. There have been no substantial applications for works above the car park podium level.

Of relevance to the scheme under consideration within this report are the following permissions:

180823 at 47 Oxford Road (opposite the Penta Hotel) for Subdivision of three-storey retail unit (Class A1) and change of use to form: 1x retail unit (Class A1) at part basement / part ground floor; 2x flexible retail or restaurant units (Class A1/A3) at ground floor level; and 2x assembly & leisure units (Class D2) - 1 at part basement / part ground floor & 1 at part ground, part first floor level, together with shared access and means of escape; associated replacement shopfront works and associated external alterations on Oxford Road and Queens Walk frontages.

Permitted 13/9/2018 and works commenced.

190099 at Units 36 and 37 Broad Street Mall (adjacent to the South Entrance of the Mall and Proposed Blocks A and B) For Amalgamation of Units 36 and 37 (Class A1) and change of use to form a flexible retail/restaurant/bar unit (Class A1/A3/A4), associated replacement shopfront works and associated external alterations on Dusseldorf Way and South Court frontages.

Permitted 31.7.2019 some works commenced.

182054 at 20 Hosier Street (adjacent to South Entrance of the Mall and Proposed Block A) for Demolition of all existing structures, erection of a part 7, part 8 storey building for use as 101 bed Hotel (Class C1 Use) at Ground - 8th Floor and Restaurant with ancillary Bar (Class A3/A4 Use) at ground floor, with means of access, servicing and associated works.

Permitted subject to a S106 Legal Agreement 4.11.2019

## 181689 SCO EIA Scoping Opinion

The content of which was agreed on validation of the current planning application.

A pre application submission was reviewed the D:SE Panel on 13.12.2018. The full planning application had been submitted on 5.12.2018. On 23.10.2019 a revised scheme was reviewed by Design South East for a second time to discuss the proposed amendments following the original comments. Further information was formally submitted to officers in November 2019.

### 4. CONSULTATIONS

Consultation responses are summarised where necessary due to the large scale nature of the proposal and the often lengthy discussions with consultees.

#### 4.1 Environment Agency

The past use of the site presents a potential risk of contamination that could be mobilised during construction to pollute controlled waters which are sensitive in this location. No objection subject to condition to secure a remediation strategy including a preliminary risk assessment, submission of a verification report and control of any piling using penetrative methods.

#### 4.2 Historic England

Historic England has raised concerns regarding the application on heritage grounds and consider that the proposed development would cause less than substantial harm to heritage assets. However, it is recognised that work has been carried out to mitigate harm in the buildings lower and closer to the Minster, and the wider benefits sought in terms of regeneration.

The impacts include harm to the character and appearance of Castle Street/ St Mary's Butts Conservation Area. In particular the area around St Mary's Reading Minster, along St Mary's Butts, where the proposal could compete with the Minster tower in views from the south east of the church, detracting from this important view of the Minster. Also, at points along Castle Street, where the proposal is considered to be an intrusion that would harm the visual quality of the street scape and thus the significance of the conservation area and the individual listed buildings.

It is noted that the site is identified as being suitable for tall buildings in the Minster Quarter Development Framework 2018 but also contains an aspiration to 'leverage value' from heritage assets to provide high quality public spaces. The document makes clear in section 2.2 that development delivered through this document will "need to work harder than most to make financial contributions to the ambitious programme of public realm measures". This echoes Historic England's advice in The Setting of Heritage Assets Advice Note 3 (Second Edition) on maximising enhancement and minimising harm which advocates removing harmful features and replacement with more harmonising elements. The MQDF proposes that the churchyard around Reading Minster is to become the green space for the existing and large number of new residents that would live in the area. In order to meet these aspirations the public realm around the Minster needs to be elevated to a good standard, which will require careful planning and considerable financial contributions to be secured by the Council through this development.



The judgement on whether the heritage harm that arises from the scheme is outweighed by public benefits is one for the Council to make. In our view, the proposals would cause less than substantial harm to a wide range of heritage assets as detailed above. Furthermore, the proposals do not, in our view, offer sufficient enhancements to the Conservation Area and setting of listed buildings that could go some way to ameliorating the extent of harm that would be caused by the prominence of the towers. We strongly encourage the Council to secure these enhancements, should they be minded to approve the scheme. We therefore consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193, 194, 196 and 200 of the NPPF.

**4.3 RBC Historic Buildings Consultant - Final Amended Plans - Revised Site A**

The Broad Street Mall is a collection of poor-quality, modern buildings. The existing buildings are of low quality and have no architectural character or interest which particularly detracts from the character of St Mary Butts. The Hosier Street site is also described in the Conservation Area as having an unattractive appearance. The re-development of Hosier Street could represent an opportunity to develop the quality of the built environment in this area, but this necessitates buildings that have an appropriate scale, mass, alignment and materiality. The main potential impacts of the scheme would affect St Mary's Butts/Castle Street Conservation Area as well as longer distance views from the Russell Street/Castle Hill Conservation Area and Market Place Conservation Area.

The proposed building heights are still considered to result in less than substantial harm to the settings of nearby Listed Buildings and Conservation Areas, from visual intrusion, however the scale of the proposals are now within those set out by RBC in its own Minster Framework. Whilst the proposals would not harmonise with views from the Conservation Areas and would be intrusive within views of the many Listed Buildings in the area, it is recognised that the proposals should also be considered against any wider public benefits identified and their conformity with the overarching RBC Planning Framework for the Broad Street Mall.

**4.4 Thames Valley Police**

Would like to commend the applicant for a design and layout capable of supporting full electronic access control throughout the development, and that secure lobbies have now been designed into the ground floors of Blocks A,B, and C (as requested). To ensure that the opportunity to include a robust access control is incorporated suggest condition be placed upon any approval for this application. Advice to aid achieving this condition; Ref Secured by Design was also provided.

**4.5 Berkshire Fire and Rescue - No comments received.**

**4.6 Housing Officer - Initial comments**

The offer is below 30% so this must therefore be assessed against a viability appraisal. Bedsits are not required and ideally more 2 beds and less one beds would be sought but if it is in line with the overall scheme mix this is appropriate. Rents for the affordable units should be limited to LHA and is noted this may be reflecting the number of units that are viable.

**4.7 Natural England - No comments to make.**

- 4.8 **Thames Water** - No objection subject to condition due to an identified inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water will contact the developer in an attempt to agree a position on water networks but given the time Thames Water request a condition be added to any planning permission.
- 4.9 **Berkshire Archaeology** - No objection - but required that further archaeological work must be secured by an appropriately worded condition should the scheme be permitted. This is in accordance with Paragraph 141 of the NPPF which states that local planning authorities should *'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'*.
- 4.10 **RBC Transport**

Relevant points should be addressed by way of amended plans or updated information prior to the determination of the application. It is confirmed a Transport Assessment has been submitted.

Pedestrian Access to Residential and Commercial uses

The residential accesses for Sites A, B, C and E are deemed acceptable. This scheme identified an accessible path along the hotel frontage but the current proposals now include steps adjacent to the hotel. It would need to be confirmed that the proposed steps will not negatively impact the surrounding footway improvements secured through the adjacent planning permission. The previously submitted drawings for the hotel identified a potential regrading that would extend 8.9m west of the hotel. It is therefore essential that the applicant assesses these proposed improvements alongside the development to ensure that the proposals do not detrimentally impact the delivery of any scheme.

The proposed units along Dusseldorf Way include the provision of seating to the frontage and this has been deemed acceptable and is consistent with planning consent 190099.

Areas around the Broad Street Mall are to be resurfaced to improve the public realm and this is acceptable in principle, this work is to be undertaken not only on the applicant's own land but also on private Council owned land. These works on private land would need to be licensed by the Council and undertaken to adoptable standards.

The applicant has stressed that the surface finishes will consist of clay brick 200mm long x 100mm wide and depth of circa 80mm which is constructed over a ridged formation to provide a robust external surface for service vehicle access and that detailed drawings will be issued to discharge a planning condition. This is an acceptable approach.

Queens Walk is a pedestrianized area with limited vehicular access with no legal access point is provided from Oxford Road to the north. To aid access to Queens Walk for the current maintenance requirements this application should include the provision of a new vehicular access from the Oxford Road.

### Trip Rates

The applicant has undertaken a trip rate analysis using TRICS (Trip Rate Information Computer System), this is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process.

Table 4.3 below taken from the Transport Assessment confirms the level of vehicular movement that would be generated by the development within the peak periods.

**Table 4.3 – TRICS Data – Vehicles, Flats Privately Owned**

Peak Hour	Average Vehicle Trip Rates			Residential Trip Generation		
	Arrivals	Departures	Total	Arrivals	Departures	Total
AM	0.022	0.043	0.064	10	19	29
PM	0.054	0.032	0.086	24	14	39

This is not a material increase and within the daily fluctuations on the network and is a substantially inflated trip rate assessment, as such given paragraph 109 of the NPPF which states proposals should only be refused on transport grounds if the residual cumulative impacts are severe, a refusal on traffic generation grounds would be hard to defend at an appeal.

Satisfied that no assessment is required for the commercial uses as they would be linked to existing trips to the town centre area.

Given that the number of trips is not a material increase and those specified in the above table would be an overly robust assessment satisfied that no junction assessments would be required.

### Car Parking for the Development

The proposal includes the provision of 22 accessible car parking spaces for the residential units which are located on the top floor of the car park adjacent to the entrances of each Tower. However no details have been submitted confirming how they will be managed in terms of allocation and avoiding abuse by the other users of the multi-storey car park. It has been stated that this would form part of the wider management strategy which would also need to be secured through the S106 as it would require consent from Reading Borough Council as operator of the Broad Street Mall Car Park.

It is noted that drawing 'Site E - Oxford Road - 2nd Floor Plan Rev P03' identifies the location of the pillars for the floors above however it is still believed that on of the pillars will obstruct the parking bays located south of the existing vehicular ramp. This is unacceptable and revised layouts will be required or tracking diagrams will need be provided to demonstrate that a vehicle can enter and exit these spaces. Given that the proposal includes a revised layout these altered parking bays must comply with current design standards.

### Cycle Parking

All the cycle parking has been proposed within the basement level of the car park apart from Site C which is located at second floor level within the car park. Access to the cycle parking bicycles would be via a lift. This location would not be ideal for residents especially as no safe access can be gained directly onto the

highway network without use of the lift, as such the cycle parking layout proposed would not comply with the NPPF at para 110 which states

*Within this context, applications for development should:*

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;*

Notwithstanding the above objection comments on the submitted layout / provision for completeness are provided:

Site A provides a provision of 84 cycle spaces within two separate storage areas. Revised drawing 0400-P-02 Site A Basement Plan and 0404-P-03 Site A Second Floor Plan identifies 58 cycle spaces double stacked within secure basement level cycle store and 26 further cycles double stacked located on Level 2 within secure, covered store. These stores are sufficient to accommodate the number of proposed cycles in the form of an acceptable layout.

Site B provides a provision of 70 cycle parking spaces this is in excess of the required 67 to comply with the Councils parking requirements and is in the form of an acceptable layout.

Site C provides for a provision of 52 cycle spaces this is in excess of the required 49 to comply with the Councils parking requirements and is in the form of an acceptable layout.

Site E provides for a provision of 26 cycle spaces this is in excess of the required 25 to comply with the Councils parking requirements and is in the form of an acceptable layout.

It would appear that cycle storage has been provided for the commercial units, which would be located at the top of the steps on the southern side of Dusseldrof Way. However, this location would obstruct pedestrian access / movement and therefore is unacceptable. The Councils standards require a minimum provision of 1 space per 6 staff and 1 per 300m<sup>2</sup>, clarity is also required that this provision meets the Councils standards.

I should also stress that the cycle store consented for adjacent hotel is located along the southern elevation of Site C, revised plans have now been submitted to identify that these will not obstruct access to the retail unit on Site C and therefore is acceptable.

### Servicing

The applicant has submitted an updated plan that identifies a revised routing diagram through the basement servicing area, however the drawing submitted is only for the existing basement plan and not the proposed basement plan and therefore is not acceptable. Given that the routing is being altered to accommodate the development it must be on the proposed plans.

Block A will result in the servicing area reducing in length and results in the removal of the in and out arrangement. This will result in service vehicles reversing back toward the car park exit and would be detrimental to Highway safety, the existing in / out arrangement must be retained. It has also now been confirmed that refuse collection would take place for this block to the east of the core, however this will block the route through the basement given that parking bays are located opposite, which is also unacceptable.

Block B has been revised and is deemed acceptable in principle.

It should also be confirmed how Retail Unit 02 would be serviced given no direct access is provided from the basement.

For Block C it had previously been requested that clarity is required as to how refuse / servicing would take place for this block given that any vehicle parking directly to the frontage of this servicing area will block the route through the basement. This has now been provided for refuse in the form of the Proposed Refuse Strategy Plan 0340-P-00 but this area will obstruct the route through the basement. A servicing zone has been identified and this has been confirmed as being for HV/LV Substation maintenance only but again this will impact the route through the basement and is unacceptable.

Revised service areas along with tracking to ensure that conflict does not occur must be submitted.

The ground floor plan for Block C illustrates a service entrance to the rear of the retail unit adjacent to the proposed hotel to which the applicant has stated on revised drawing 0601-P-04-Site C Ground Floor Plan that servicing will be via the existing service corridor and goods lift within the centre as indicated on drawing. However, looking at the existing basement and ground floor masterplan drawings there would appear to be no goods lift at the location indicated and only steps. This is not an acceptable service route and will result in service vehicles attempting to service the site from Dusseldorf Way which is unacceptable. Revised drawings are therefore required illustrating a service lift for the retail unit.

Block E is acceptable in principle but the carrying distance to a refuse collection vehicle would be in excess of 15m specified within the British Standards. The applicant has stated that refuse storage must be within the residential demise and secure. Drag distance to be agreed once a privately managed waste management strategy to be agreed. I am therefore happy for this to be dealt with by way of a condition.

As I have stated previously, I am aware that cleaning / maintenance of the western elevation of the Broad Street Mall and Fountain House currently takes place along Queens Walk. Clarity has now been provided to confirm that Window cleaning / maintenance for block A via abseiling from the rooftops of towers and this is deemed acceptable.

In addition, the location of the trees would need to be positioned so as to retain a vehicular access and a turning area as well as being spaced away from the lighting columns provided along its length to reduce the introduction of dark spots. Having reviewed the latest landscape masterplan the proposal includes the provision of trees directly adjacent to the lamp columns along Queens Walk which could not be accepted. The applicant has however stated that the details of the external lighting will be developed and fully coordinated with the proposed trees positions. Detailed drawings will be prepared to discharge a planning condition and I am happy that this is an acceptable proposal.

#### Impact on Multi-Storey car park

It is stated that a provision of 87 spaces would be lost with a further 22 spaces allocated to the residential development resulting in a total reduction of 109 spaces from the multi-storey car park and in principle this is deemed acceptable from a planning point of view.

The introduction of the central core for Block A has resulted in revised exit barriers which are deemed acceptable in principle given that a second barrier has now been re-provided for. However, the new route would require vehicles to travel between pillars and therefore tracking diagrams should be provided to ensure that vehicles can undertake this manoeuvre.

The parking layout will be affected by the provision of the central cores and revised drawings have now been submitted identifying the wider impacts to the car park layout. I have reviewed these and I comment as follows:

#### Podium Level

- The submitted plans have removed the barriers to the west of Tower B but the submitted drawings still identify the columns that will be located in the centre of the aisle which would be an excessive 11m. This will result in conflict and therefore a revised car parking layout must be provided.
- It is noted that 7 spaces are to be lost around Tower B but to the north of the tower a new aisle width is created which would include the provision of a structural column in the middle. This will result in conflict and therefore is unacceptable.
- It is noted that the proposed route east of Site A has a width of 2.5m but given this route is adjacent to a structure this should be provided with an extra width of 300mm. Please note that this should not encroach on the pedestrian route which is located to the west of the parking bays and is illustrated on the submitted plans.

#### Second Floor Level

- The submitted plans now illustrate the location of proposed pillars / supports but this is specified as being indicative at this stage. However it is noted that no pillars / supports have been identified along the western elevation which would not only be required for the landscape podium but all of the floors above. This western elevation oversails the ramps to and from the second floor of the car park and as such the lack of information regarding this means that the Highway Authority are unable to determine what impact the development would have to the second floor of the car park. As previously stated this would need to be clarified on revised plans so any implications for car parking can be fully assessed.
- An area is provided surrounding the core of Tower B and this has been confirmed as being an 'area of limited head room due to chamfered structure of proposed tower above'. Given that car parking spaces are located underneath this structure along the western boundary of the core the actual height must be confirmed.

It has previously been asked what implications are proposed to the lighting and drainage of the car park as a result of the layout changes? Given the existing lighting and drainage is designed specifically to the car park layout and is likely to require alterations. However the applicant has stated that this can be dealt with by way of a condition, in planning terms this could be dealt with at a later date but given this will have implications for the car park operator whom would also need to sign this off this would need to be secured through a S106 Agreement.

Further issues have also been raised that should be discussed with the car park operator these have been provided to the applicant.

#### 4.11 RBC Environmental Protection - No objection subject to conditions.

The following matters were considered:

Noise impact on development -The noise assessment concludes that standard thermal double glazing and whole house ventilation will provide suitable noise insulation for the development. Tonal noise from a single fan was noted at monitoring position S1 which may affect block E. A specific condition is therefore required to mitigate this potential impact.

Noise between residential properties - Sound insulation of any building to be required.

Noise generating development - Opening hours of the new commercial units to be conditioned to prevent noise disturbance of residents.

Noise generating development - The noise assessment has stated that the cumulative noise level from plant noise will be 10 dB below pre-existing background level but plant details have not been provided therefore a condition is recommended.

Kitchen Extraction - Cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005). This can be controlled by condition.

Air Quality - The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO<sub>2</sub>) and introduces new exposure / receptors. The submitted air quality assessment has been reviewed which shows that the air quality objective limit values are unlikely to be exceeded at the facades of the new development, therefore no further assessment, or mitigation, is required.

Air Quality - Increased emissions - Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this, recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>). The submitted air quality assessment predicts a slight worsening of air quality at sensitive receptors as a result of the development. Whilst the assessment describes this as negligible, because it is a worsening in an area already exceeding the air quality objective limit values, we would consider this of significance. This is in the context of a considerable amount of effort being undertaken to make improvements in the air quality in the town centre.

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality. Where any increase in emissions is identified a mitigation scheme must be submitted. The mitigation scheme must quantify the emissions saving that it will bring about, in order to prove that the detrimental effect of the development can be offset. This matter can also be addressed by condition.

Contaminated Land -Where development is proposed, the developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action. The development lies on the site of an historic garage which has the potential to have caused contaminated land and the proposed development is a sensitive land use. Therefore, conditions are required to ensure that future occupants are not put at undue risk from contamination.

Construction and demolition phases -We have concerns about potential noise and dust associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). This can be appropriately controlled by condition.

Bin storage -There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas e.g. flats and hotels there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. This can be controlled by condition.

#### 4.12 RBC Natural Environment Trees

No objection, subject to clarification and conditions.

The retention of the existing mature trees in Dusseldorf Way and Hosier St/St Marys Butts and in Oxford Road is positive. The landscape principles proposed appear to be in line with the Outline Development Framework for the Hexagon Quarter by, for example, the inclusion of landscaping in Queens Walk ('Queens Walk greenstreet), private amenity space for residents, seating, green areas and tree planting in the ground where feasible. The intention to reflect some of Reading's history in the landscaping, e.g. Sutton Seeds, Huntley & Palmer and the Hexagon is noted and will be a positive element. A tree survey of existing trees to be retained is required. Further detailed queries were also raised.

Further information has been submitted that is under review at this time.

#### 4.13 RBC Ecological Consultant -

The ecological report submitted with the EIA scoping application stated that the buildings are unlikely to host roosting bats and there should be no bat related constraints to the proposals. However, the buildings will be used by nesting birds, and, as such works which could potentially affect nesting birds will need to be preceded by a nesting bird check. This should be secured via a planning condition, as below:

*Condition: Works to parts of the building where birds may nest are to be preceded by a check by a suitably qualified ecologist for bird nests. If active nests are recorded works that could disturb active nests shall proceed until the nest is no longer in use.*

*Reason: To ensure that wildlife is not adversely affected by the proposed development in line with Policy CS36 of the core strategy and wildlife legislation.*

In accordance with paragraph 175 of the NPPF, CS36 of the Core Strategy and EN12 in the emerging local plan, biodiversity enhancements should be provided within the scheme. And for a scheme such as this it would be appropriate to incorporate nesting opportunities for swifts and peregrine falcons both of which are birds of conservation concern that nest on buildings. It is recommended that



this is shown on the revised landscaping plans or secured via a planning condition. The landscaping proposals include elements of roof garden which will be of some value to wildlife however no dedicated biodiverse green roof areas are proposed which could provide significant additional enhancements for wildlife. Artificial turf which are a source of microplastic pollution and which has no benefits for wildlife or climate change adaptation and should be removed.

Revised information has been submitted to remove artificial turf and provide biodiversity green roofs in order to increase biodiversity. This information is under review at this time.

**4.14 RBC Emergency Planning**

No comment received

**4.15 RBC Leisure**

No objection subject to a section 106 agreement to secure a financial contribution of for leisure and recreation improvements. The applicant is providing limited play provision within the application site however given the configuration of this large scale development, delivering adequate open space and sports and leisure facilities on site is not possible. In these circumstances it is important to provide high quality facilities close by via a financial contribution secured via s106. It is considered that a sum of £1,500 per unit is appropriate in this location.

**4.16 RBC Sustainability - No formal comment.**

**4.17 RBC Licensing - No objections to the plans in respect of the current and future development of this area.**

**4.18 Reading UK CIC - Notes that this development falls within the Central Reading Business Improvement District and generally welcomes development that adds to the regeneration work already taking place at Broad Street Mall, driving footfall and creating new investment in the western edge of the town centre. However, we would hope that every step is taken to mitigate the impact of this scale of construction work on the surrounding shops and businesses. Note the scale of the proposed development will call for an employment and skills plan, which we would expect to be confirmed through a S106 agreement.**

**4.19 CCTV - There is camera in the area which covers the Hexagon and Hosier street area. The building works themselves may disrupt the view for a period but no objection in principle. Further CCTV coverage should be sought in this area.**

**4.20 SUDS - No objection - Revised information has been submitted to demonstrate that the development does not result in any increase in impermeable area and in fact includes areas of landscaping at the amenity level which would provide a betterment over the existing situation.**

**4.21 Civil Aviation Authority - Confirmed that no issues are raised with any nearby airports/aerodromes. Due to the distances from the nearest aerodromes, there are not considered to be any safeguarding issues. However due to the height of the proposals advice to the developer is highlighted in relation to construction matters, cranes and lighting.**

**4.22 Marine Management Organisation - No objection.**

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

- 4.23 **Sport England** - No objection as the site does not consist a playing field however Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport.
- 4.24 **Natural England** - No objection.

#### Public Consultation

- 4.25 February 2019: Neighbouring occupiers at 19-20 St Marys Butt and 21-23 Pavlovs Dog were notified of the application by letter. 6 site notices were also displayed within the area surrounding the application site including 1 adjacent to the entrance at the McIlroy Building. A notice was published in the press.

November 2019: On the submission of revised information all consultees were reconsulted for 21 days. 6 site notices were also displayed within the area surrounding the application site including 1 adjacent to the entrance at the McIlroy Building.

Under the EIA Regulations the submission of amended EIA information required a further notice in the press. To comply with this requirement a further notice was therefore published in the press in February 2020 (consultation period to expire 20<sup>th</sup> March 2020)

February 2020: A 7 days consult was carried in relation to additional information in relation to Townscape and Heritage matters to Historic England and the third parties who had submitted responses to the development set out below:

- 4.26 4 responses have been received objecting on the following grounds:

#### Baker Street Area Neighbourhood Association:

- The applicants EIA fails to take into account the Russell Street/Castle Hill Conversation area, despite references within the MQADB. Therefore, seeking further EIA information be provided prior to determination of the application.
- The design of the high rise towers is not bold enough, and that the detailed design of the metal work at the top of the towers will not be visible at street level and should be deleted.
- The proposed blocks are taller than those permitted within the Minster Quarter Area Development Framework Brief; and the height proposed is not justified. Block A casts shadow over Block B and Block C and the specified density is misleading.
- The development does not achieve the 30% affordable housing requirement.
- The proposals do not fully regenerate the public realm and works to all four edges of the site should be undertaken.
- Seeking substantial S106 monies to fund substantial public realm improvements including greening over the top of the Broad Street Mall or towards Decking of the IDR.

- Seek robust fire strategy
- Due to being car free query how visitors will be accommodated
- Impact on GP surgeries and school places

#### CAAC

##### Initial comments:

- The Heritage Statement does not address the requirements of Policy EN4, EN5 or EN6.
- The proposal does not demonstrate how it will make a positive contribution to the existing historic townscape.
- Fails to address the impact on Russell Street /Castle Hill Conservation Area
- The development will have an overbearing impact on the RSCH Conservation Area
- In relation to the impact on the St Marys Butts/Castle Street Conservation Area do not consider that the quality of architecture will mitigate the impact and provide a beneficial impact on the Conservation Area.
- The Significant Views with Heritage Interest has not been carried out in relation to view 1 from Mclroy Park and view 2 View Northward on Southampton St from Whitley Street
- The three towers will provide a high density development before the rest of the area redeveloped
- Object to any development taller than Fountain House
- Object to infill of the South Court Entrance
- Concern re the acceptability of the living environment being built.
- The opening up of the Mall frontages on Queens Walk and Dusseldorf Way is an improvement.

##### Further comments

- Maintain objection: Seek information to protect the view to Mclroys itself; and re-iterate request for a visualisation of this heritage view down Southampton Street.

##### Other third parties:

- This will change the nature of the area. if the scheme is to be allowed then there should be a compensation and the builder make a park over the dual carriageway as has been previously agreed.
- Object to the poor standard of architecture apparent not least in the insensitive obliviousness to the rights of previously existing buildings. The development does not compensate for the loss of the unique and historic appeal of the Eva's building.

##### Reading Borough Council as adjacent land owner:

- The Council as owner of the former civic offices site and as a lead partner in the delivery of the Minster Quarter area regeneration notes the principle of the Applicants development in seeking to deliver the aspirations of the Hosier Street area.
- A large element of the SPD and the Council's place making aspirations is the creation of a new sustainable neighbourhood including high quality public realm and the proposed development needs to acknowledge and support this wider vision both financially and in design terms and not prejudice or fetter the ability to deliver the wider comprehensive regeneration of the area.
- The proposed development will also need to address the impact of the proposed development on the multi storey car park, both in terms of legal and practical interference with the Council's rights and the continuing operation of the car park.

## 5.0 LEGAL AND PLANNING POLICY CONTEXT

- 5.1 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving the listed building or its setting or any features of special interest which it possesses.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 5.3 The application proposals are subject to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and are supported by an Environmental Statement issued pursuant to these Regulations. Much of the supporting technical information for the applications is contained in the Environmental Statement which consists of December 2018 documentation and revisions within Updated Addendum documents issued in November 2019.
- 5.4 Following the original planning application submission in 2018 an updated version of the National Planning Policy Framework (NPPF 2019) and Reading Borough Local Plan (2019) have been adopted. The November 2019 revised submission of the development proposals therefore makes reference to, and has been considered against, these documents.

### **National Planning Policy Framework (NPPF) (2019)**

The following NPPF chapters are the most relevant (others apply to a lesser extent):

- 2. Achieving sustainable development
- 4. Decision-making
- 5. Delivering a sufficient supply of homes
- 8. Promoting healthy and safe communities
- 11. Making effective use of land
- 12. Achieving well-designed places
- 16. Conserving and enhancing the historic environment.

### **Planning Practice Guidance (NPPG)**

The Government's Planning Portal advises that local planning authorities should take account of the following practice guidance:

- Assessment of housing and economic development needs
- Conserving and enhancing the historic environment
- Design
- Natural Environment
- Planning Obligations
- Viability
- Build to Rent (13/9/18)

## 5.5 **Reading Local Plan 2019**

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION  
 CC3: ADAPTATION TO CLIMATE CHANGE  
 CC4: DECENTRALISED ENERGY  
 CC5: WASTE MINIMISATION AND STORAGE  
 CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT  
 CC7: DESIGN AND THE PUBLIC REALM  
 CC8: SAFEGUARDING AMENITY  
 CC9: SECURING INFRASTRUCTURE  
 EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT  
 EN3: ENHANCEMENT OF CONSERVATION AREAS  
 EN4: LOCALLY IMPORTANT HERITAGE ASSETS  
 EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT  
 EN7: LOCAL GREEN SPACE AND PUBLIC OPEN SPACE  
 EN9: PROVISION OF OPEN SPACE  
 EN10: ACCESS TO OPEN SPACE  
 EN12: BIODIVERSITY AND THE GREEN NETWORK  
 EN14: TREES, HEDGES AND WOODLAND  
 EN15: AIR QUALITY  
 EN16: POLLUTION AND WATER RESOURCES  
 EN18: FLOODING AND DRAINAGE  
 H1: PROVISION OF HOUSING  
 H2: DENSITY AND MIX  
 H3: AFFORDABLE HOUSING  
 H4: BUILD TO RENT SCHEMES  
 H5: STANDARDS FOR NEW HOUSING  
 H10: PRIVATE AND COMMUNAL OUTDOOR SPACE  
 TR1: ACHIEVING THE TRANSPORT STRATEGY  
 TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS  
 TR4: CYCLE ROUTES AND FACILITIES  
 TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING  
 CR1: DEFINITION OF CENTRAL READING  
 CR2: DESIGN IN CENTRAL READING  
 CR3: PUBLIC REALM IN CENTRAL READING  
 CR5: DRINKING ESTABLISHMENTS IN CENTRAL READING  
 CR6: LIVING IN CENTRAL READING  
 CR7: PRIMARY FRONTAGES IN CENTRAL READING  
 CR10: TALL BUILDINGS  
 CR13: EAST SIDE MAJOR OPPORTUNITY AREA

## 5.6 Supplementary Planning Documents (SPD's)

Minster Quarter Area Development Brief (MQADB - December 2018)  
 Supplementary Planning Document: Affordable Housing (July 2013)  
 Supplementary Planning Document: S106 Planning Obligations (March 2014)  
 Supplementary Planning Document: Parking Standards and Design (October 2011)  
 Supplementary Planning Document: Employment Skills and Training (April 2013)  
 Supplementary Planning Document: Sustainable Design and Construction  
 (December 2019)  
 Tall Buildings Strategy 2008

Tall Buildings Strategy Update Note 2018  
Reading Open Space Strategy (2007)  
Reading Tree Strategy (2010)  
St Mary's Butts/Castle Street Conservation Area Appraisal  
Russell Street / Castle Hill Conservation Area Appraisal

#### **Other Government Guidance which is a material consideration**

Historic England Good Practice Advice in Planning Note 1: Conservation Area Designation, Appraisal and Management (Historic England, 2016)  
Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015a)  
Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015b)  
Historic England: Advice Note 4 "Tall Buildings" (2015).  
English Heritage/CABE: "Guidance on Tall Buildings"  
BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, 2<sup>nd</sup> edition (2011)  
Guidelines for Landscape and Visual Impact Assessment, 3<sup>rd</sup> Edition (Landscape Institute and Institute of Environmental Management & Assessment, 2013)  
Strategic Housing Market Assessment (2016)  
Infrastructure Delivery Plan (2017)

## **6. APPRAISAL**

The main issues raised by this planning application are as follows:

- Principle
- Development Density, Unit Mix and Affordable Housing
- Height, Scale and Massing, Appearance and Impact on Heritage Assets
- Public Realm, Trees and Ecology, Recreation and Leisure
- Amenity of Existing and Future Occupiers
- Transport
- Sustainability
- Flooding
- Archaeology, Phasing and Environmental Statement
- S106 and other matters

### Principle

- 6.1 The NPPF 2019 (para 85) states that planning policies and decisions should define a network and hierarchy of town centres and promote their long-term vitality and viability - by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.
- 6.2 The NPPF also encourages the effective use of land by reusing land that has been previously developed; (brownfield land para 118) and seeks that all housing applications should be considered in the context of the presumption in favour of sustainable development. The MQADF sets out that the immediate environs of the Minster Quarter Area represent one of the largest brownfield regeneration opportunities within the IDR. The accessibility of the application site, located within the defined Reading Central Area, is considered to accord with Policy CC6 (Accessibility and Intensity of Development) and the reconfigured commercial units are within an existing retail centre in the Primary shopping area (Policy

CR1). The additional provision of new housing is also in accordance within the broad objectives of Policy H1 (Provision of Housing) to assist in meeting the annual housing targets and CR6 (Living in Central Reading).

- 6.3 In terms of the form of the development Policy CR10 'Tall Buildings' specifies 'areas of potential for tall buildings' defining tall buildings as exceeding 12 storeys of residential accommodation. The application site sits within the Western Grouping of Tall Buildings and identified as sub area CR10b. Sites A, B and C would fit the definition of tall buildings and are acceptable in principle in this location. The Western Grouping is described as a secondary cluster of tall buildings to create a distinctive grouping, to mark the area as the civic heart of Reading and a gateway for the centre. Tall buildings in this area should be subservient to the Station Area cluster; be generally lower in height than the tallest building planned in the Station Area cluster; be linked to the physical regeneration of the wider area; not intrude on the key view between Greyfriars Church and St Giles Church, and a view between the open space in the Hosier Street development and Reading Minster. The policy also sets requirements for all tall building proposals to be of excellent design and architectural quality as these buildings will be visible from a wide area.
- 6.4 The proposals are considered to be subservient to the Station Hill development as this development is formed of 3 tall buildings with comparatively small floor areas with significant separation distance between each dwelling. Each proposed tower is set at a lower height than the tallest building permitted at Station Hill (at 128 AOD), with the proposed tower elements consecutively stepping down in height from Site A to Site C. The application site also encompasses a significant area of public realm improvements and financial contributions that can be utilised for further regeneration of the wider area. The proposed development set within the footprint of the existing BSM so is not considered to intrude on the view stated above. Matters of design and architectural quality are set out sections below.
- 6.5 The site additionally forms part of the West Side Major Opportunity Area Policy CR12. The policy vision for this area seeks to create a "mixed use extension to the west of the centre containing high quality mixed use environments and fostering stronger east-west links into the central core". Within this policy sub site CR12d 'Broad Street Mall' is proposed to be used for continued retail and leisure provision, improving frontages along Oxford Road and St Marys Butts, and improving frontages to Hosier Street and Queens Walk with use including residential on upper floors - development which retains the existing mall with additional development above may be appropriate where it improves the quality of existing frontages. For context, development on Hosier Street is also promoted by Policy CR12e. The mixed use development proposed retains and upgrades the existing retail frontages within the Broad Street Mall whilst incorporating residential development at upper floors.
- 6.6 The proposal is further considered in relation to the Minster Quarter Area Development Framework (The MQADF seeks to set out the "*principles for promoting the development of the area to ensure co-ordinated, high quality, comprehensive development creating a multi-purpose urban quarter for central Reading*"). The indicative Development Framework Master Plan (fig 10 within the MQADF) shows development above the Broad Street Mall with areas of private roof garden allocated for residential use (but not the entirety of the existing roof car park); and the activation of the southern façade along Dusseldorf Way/Hosier Street to provide 'spill out' space for restaurant /cafes.

- 6.7 In relation to the specific guidance on permissible heights within the MQADF it is noted that the adopted document is not consistent in how it refers to ‘podium’ level. Section 5.2 ‘Form, Scale and Height’ refers specifically to new towers on the BSM upper podium level. Further text under the heading ‘Proportion of Towers’ refers to 20 storeys above podium level as an indicative building height limit but also that “It is accepted that buildings above the podium on the Broad Street Mall will increase the overall building heights above this level”. Also, under the heading ‘Tower Set Back and Plinth’ in relation to development along Dusseldorf Way it is stated that the “definition of building plinth (the level up to podium) should be read as a defined retail edge”. It is also noted that Fig 22 ‘Building Parameter Diagrams’ (extract below) clearly shows new built form above the existing Broad Street Mall to a height of 60m. This would equate to approximately 20 stories (at 3m height per floor) above the existing Broad Street Mall plinth.

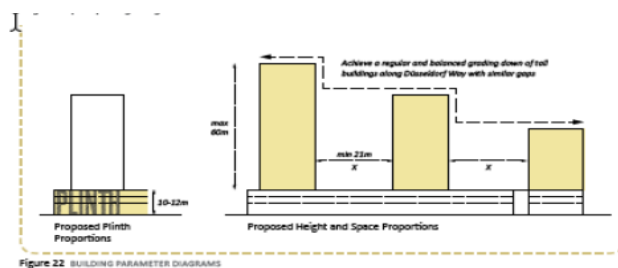


Figure 22 BUILDING PARAMETER DIAGRAMS

- 6.8 Site A has now been reduced in height to 20 storeys (64m) above the existing roof of the BSM (23 stories from lower podium level). Site B is maintained at 18 storeys above the existing roof (21 stories from lower podium level) retaining ‘step down’ in heights of proposed development blocks. The proposal is therefore now akin to the parameters set out within with the MQADF. The reduced height sits beneath the maximum height of the Station Hill proposals, in accordance with Policy CR10. The proposed height sought is also subject to other material planning considerations including detailed design and appearance, impact on the wider area, amenity and public benefits of the scheme. These are set out in the report below.
- 6.9 The MQADF (section 3) describes the importance of the creation of a new public realm for the community. The document seeks significantly enhanced existing routes including Queens Walk and Dusseldorf Way as active multi use spaces with high quality landscape treatment with each especially having its own distinct character. New street trees should be planted into the ground wherever possible but where this is not achievable planted or raised beds can be used. Sustainable material choices should also be capable of replication. The landscaping within the public realm on Queens Walk is formed of Brick pavements and street trees with planters on the western edge to also allow for a pedestrian footway and sitting out areas to the front of the retail units within the Broad Street Mall. Dusseldorf Way contains additional seating and a green wall /planter feature.
- 6.10 Therefore the proposed residential and retail uses, and public realm improvements are considered to be acceptable in principle and in accordance with the applicable elements of the specific sub-area designation. The form of development including Tall Buildings located within a designated Tall Building Cluster is also acceptable in principle subject to its impact on the wider area and other material planning considerations as set out below.



## Development Density, Unit Mix and Affordable Housing Provision

- 6.11 The application proposes 422 units at a development density of 175 dwellings per hectare (site area 2.42ha). Although a high density development, it is noted that there is no prescribed local policy density upper limit for town centre sites, with Policy CR12d (BSM) stating an indicative potential of 280-420 dwellings at this site. Policy H2 (Density and Mix) outlines an indicative density of above 100 dph in town centre locations however accepts that the appropriate density may be significantly greater than this in view of the need to make best use of accessible sites. Additionally, the layout of units in 'high rise' form will inevitably result in higher density development which is considered to be acceptable in this location.
- 6.12 In terms of unit mix Policy CR6 (Living in Central Reading) seeks, as a guide, that residential developments within the town centre area should incorporate a maximum of 40% of 1 bedroom units and a minimum of 5% of 3 bedroom units. The application proposes 201 x 1 bedroom units (48%), 199 x 2 bedroom units (47%) and 22 x 3 bedroom units (5 %). The higher percentage of 1 bed units results from the revised scheme providing a more slender Block B, removal of single aspect north facing units and ensuring that the scheme delivers more dual aspect units resulting in fewer 2 bed units. Therefore although not wholly policy compliant in this respect of 1 bed units this ratio is considered to be justified, the number of 3 bed units is policy compliant and the 22 accessible units are welcomed.

### *Build to Rent and affordable Housing*

- 6.13 The entirety of the scheme is to be constructed as Build to Rent units. This is defined in the NPPF Glossary as *“Build to Rent: 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 process for managing affordable private rent units is therefore set out in the section 106 agreement Heads of Terms. This seeks to detail the parameters of the lettings agreement, the rent levels, apportionment of the homes across the development, a management and service agreement, and a marketing agreement setting out how their availability is to be publicised. The national guidance addresses the question of eligibility criteria for occupants and recommends a 3 year minimum tenancy.
- 6.15 Local Plan Policy H3 and H4 both require Affordable Housing at 30% of the total provision for a 'Major' application. Additionally, the supporting text for Policy H4 (at 4.4.31) clarifies that *“The Council will expect rental levels for the affordable housing or Affordable Private Rent housing to be related to Local Housing Allowance (LHA) rate levels (including service charges) and be affordable for those identified as in need of affordable housing in the Borough. The Council will expect such housing to remain affordable in perpetuity”*.
- 6.16 The proposal as finally amended offers the entirety of Block E (42 units) as affordable units at the LHA rate which now equates to 10% of the total scheme. As this falls below the policy complaint level of provision. The applicant submitted a viability appraisal with the revised November proposals. This viability approach has been independently reviewed on behalf of the Local

Planning Authority by BPS Chartered Surveyors who consider that an offer of 9% of 446 units maximises affordable housing delivery on the site. This is primarily due to the structural constraints of building within the existing Mall and keeping the commercial building units operational during the build process. In terms of mix and location the offer of the entirety of Block E (mix as set out above) is acceptable. This is considered to be a good mix of units with the size and layout of units now in accordance with national space standards. Discussions are ongoing between the applicant and the Council's Valuation Manager on the detailed mechanism regarding affordable housing in relation to clawback position - which will be provided in the form of an update report.

#### Height, scale and massing, appearance and impact on Heritage Assets

- 6.17 The development proposals have been considered on two occasions by the South East Review Design panel and the scheme amended to incorporate suggested comments. The Panel was generally positive about the overall design and provided some guidance on further improvements. The Design and Access Statement Addendum details revisions in relation to the comments of the Panel.
- 6.18 Policy CC7 aims to preserve or enhance the character of the area in which a development is located. Policy CR2's (Design in the Centre) purpose is to secure appropriate relationships between buildings, spaces and frontages within the centre of Reading. Policy CR3 requires proposals to make a positive contribution towards the quality of public realm in the central area of Reading. The historic environment is also specifically sought to be protected under Policy EN1: Protection and Enhancement of the Historic Environment; EN3: Enhancement of Conservation Areas; EN4: Locally Important Heritage Assets; EN6: New Development in a Historic Context.
- 6.19 Additionally as 'Tall Buildings' within the Western Grouping Sites A, B and C are considered against the detailed criteria within Policy CR10 (specific Policy CR10B is considered above) which sets out all tall buildings should:
- be of excellent design and architectural quality advice was sought from South East Review Design Review Panel - *the proposal is considered to comply in this regard, following amendments during the course of the application.*
  - Enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building; *The proposed building has a clearly defined base within the existing Broad Street Mall replicated in Proposed Block C; with the middle and upper sections in differing materials becoming more light weight at the highest point to enhance the skyline.*
  - Contribute to a human scale street environment, through paying careful attention to the lower section or base of the building, providing rich architectural detailing and reflecting their surroundings through the definition of any upper storey setback and reinforcing the articulation of the streetscape; *The base of Block C and the proposed residential entrances have been revised to provide improved architectural detailing and the upper floors achieve a degree set back due to the deep window reveals with Site A physically set back from the site frontage*
  - Contribute to high-quality views from distance, views from middle-distance and local views; *The verified views and supporting visualisations sufficiently demonstrate compliance in this regard.*
  - Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style; *the proposal is located in an area of very mixed urban grain with the proposals seeking to provide a transition from the historic to contemporary development.*

- Avoid bulky, over-dominant massing; *the towers have been reduced in height and width during the course of the application to seek to achieve a slender vertical design considered to avoid bulky, over dominant massing*
  - Preserve and, where appropriate, enhance the setting of conservation areas and listed buildings; *This is considered in detail in the 'effect on heritage assets' section below.*
  - Use high quality materials and finishes; *the proposal complies in this regard, as detailed in the proposals section.*
  - Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm; *Improvements to the public realm are a requirement and major benefit of the scheme.*
  - Locate any car parking or vehicular servicing within or below the development; *No additional car parking is proposed and the majority of servicing is via the existing Mall basement service area*
  - Maximise the levels of energy efficiency in order to offset the generally energy intensive nature of such buildings;
  - Mitigate any wind speed or turbulence or overshadowing effects through design and siting; *this is generally acceptable with further work being carried out at this time*
  - Ensure adequate levels of daylighting and sun lighting are able to reach buildings and spaces within the development; *This has been assessed as acceptable*
- Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting; *An independent review has identified some daylight and sunlight deficiencies for some occupiers of the McIlroy Building and 38 Oxford Road however officers consider on balance that the identified daylighting deficiencies are not sufficient to warrant the refusal of this application, when applying an overall critical planning balance.*

6.20 It is accepted that not every criterion is met in full but the majority are and there is a suitable policy basis for tall buildings as proposed in this location. It is also noted that the height of Block A has been reduced to 20 stories to accord with the MQADF. It is therefore considered that the amended scheme with the scale of the proposed tower at Site A reduced in height to within 5m of the maximum anticipated by the MQADF has enabled officers to accept that on balance the proposal sufficiently meets policy requirements to be recommended for approval.

6.21 In relation to the scale and massing of the scheme, during the course of the application, as well as the each of the tall blocks being reduced in height, Site B and E have also been reduced in width, with Block D entirely removed from the scheme. The form of the towers incorporates a shoulder element seeking to create a slender vertical form and reduce the overall visual impact of the blocks, particularly within the skyline. The base of Blocks A and B have also been lowered in relation to the existing mall to better integrate with the existing structure.

6.22 In relation to visual appearance and detailed design and materiality of the scheme it is noted this can be a highly subjective issue. The design, in particular the elevational treatment, has evolved in the context of the surrounding Conservation Areas and existing buildings within the site. As required by policy, Blocks A, B and C have a defined 'bottom', 'middle' and 'top'. The bottom level is formed of the current Broad Street Mall retail frontages including the existing concrete frieze. The proposed base of Block C infills the existing recessed South Court and the proportions of the bottom floor have been amended to replicate

the existing mall, with glazing at ground floor; the introduction of vertical bays to break up the façade; and horizontal framing to align within the existing concrete structure. The residential entrances to be created for Block A and B are also the full height within the bottom of the building. The proposal also includes a further amenity deck which is considered to add interest and variety to the building.

- 6.23 The design of the upper floors varies between the blocks due to the differing construction methods, however, Blocks A, B and C have been designed as a family of buildings. The middle section of each block contains alternating window/cladding patterns which becomes less uniform as the buildings step away from the traditional form of the St Marys Butts Conservation Area. The façade details have also been very carefully considered with each block containing recessed windows with deep reveals to provide additional visual interest and highlight the changing grid pattern with the middle section of the building. The proposals are visible on all four elevations so this design is replicated on the main element of each tower.
- 6.24 The concept of the top section of the blocks has evolved throughout the consideration of the application. The upper floors of each block have simplified windows reveals and will be clad in a differing material to the lower floors consisting of a bespoke laser cut metal panel inspired by the appearance of the of the existing concrete frieze at the bottom level. The upper floor of Blocks A and B also contain inset balconies that provide views through the external concrete of the building. This is considered to be an innovative design response and is considered to add additional value to the overall design quality. To ensure the design quality in this instance it is considered essential for all external materials to be secured via condition, including the provision of sample construction panel details being erected on site prior to approval to guarantee the design quality in this sensitive location.
- 6.25 Block E is not classified as a tall building and is set in the context of existing development orientated towards the Oxford Road. This block therefore deliberately differs in form to the other blocks and has been amended, during the application, to remove the former ‘hammer head’ design. The proposed residential access will be within the north facing shopping parade at ground floor. The proposed new build floors are geometric in form with the north elevation lower to meet the existing mall roof, and the rear cantilevered over the existing car park. This is considered to be an appropriate design solution in this location. There is a simplicity to the alternating terracotta cladding and aluminium framed glazing which is appropriate in this location. This block also houses a roof top garden that contains pergolas, these may be visible in some views but are considered to add interest to the building.
- 6.26 It is considered that the proposed design of the buildings achieves the required high quality approach to lift the appearance of the existing mall. The proposals incorporate good quality materials (detailed samples of which are to be secured by way of condition) and successfully provide a cohesive form of development within the family of buildings whilst transitioning between the contemporary and historic character of the site and its surroundings.

#### Heritage Assets / Views

- 6.27 As noted throughout this report the application site is sensitively located in relation to two Conservation Areas and surrounding listed buildings including the Grade 1 Listed Reading Minster. The application is supported by a Heritage, Townscape and Visual Impact Assessment (HTVIA) that related to the original

submission, an Amended Assessment dated Nov 2019 relation the revised scheme; and a further Heritage and Townscape Response dated January 2020. This documentation includes 23 different views of the development as Blocks A, B and C will be visible in short, medium and longer range views from the surrounding area. Long range views provided include the viewpoint from Balmore Park (referenced as being of importance within the Council's Tall Buildings Strategy (2008)) and the view from Kings Meadow looking south west. These have been reviewed by officers and it has been found that the buildings would not negatively impact upon distant views.

- 6.28 The comments of objectors in relation to the submitted HTVIA in relation to the Russell Street/ Castel Hill Conservation area; and views listed at Policy EN5 'Protection of Significant Views with Heritage Interest; have been fully considered by officers. Within the November 2019 Townscape, Built Heritage and Visual Impact Assessment two views (viewpoints 03 and 09), located on Oxford Road looking east towards the proposed development along the northern boundary of the conservation area have been included. A further verified view from Baker Street looking east out of the Russell Street / Castle Hill conservation area towards the application site was also submitted in January 2020. It is noted that this is the only outward looking view indicated on the Character Area Appraisal map within the Russell Street/ Castle Hill Conservation Area Character Appraisal. It is also noted that Historic England do not raise concerns in relation to the Russell Street/ Castle Hill Conservation Area.
- 6.29 Policy EN5 lists views of acknowledged historical significance including 1. View from McIlroy Park towards Chazey Barn Farm, the Thames Meadow and the Chiltern's escarpment; and 2. View Northwards down Southampton Street from Whitley Street towards St Giles Church, St Marys Church and Greyfriars Church. It is confirmed that the proposals will not appear in View 1, and in relation to View 2 this is addressed by View 17 in the November 2019 Heritage Assessment. Proposed Blocks A, B and C are visible in this view but due their siting within the existing Mall footprint retain this view toward the churches. It is therefore considered that the scope of the submitted information is adequate to assess the impact of the development on Heritage Assets.

The applicant considers that the current Broad Street Mall does not provide a positive setting to the Conservation Area or the listed buildings so the introduction of their proposed high-quality architecture as a back drop should be regarded as an improvement. The applicant concluded the significance of the impact to be of 'beneficial' effect. However, taking into account the independent assessment from Historic England and the Council's Historic Building consultant officers consider that that the scheme would be accurately described as causing 'less than substantial harm' to heritage assets and should be assessed against relevant policy on this basis.

- 6.30 Historic England advised that The Planning (Listed Buildings and Conservation Areas) Act sets out at Section 66 that special regard should be paid to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Section 72 of the same Act sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework requires at 190 that LPAs should take into account the significance of any heritage assets that may be affected by proposals so as to avoid or minimise any conflict between conservation of that asset and the proposal. Great weight should be given to the conservation of heritage assets, regardless of whether harm to significance would be substantial or less than this,

as set out at paragraph 193. Clear and convincing justification for any harm must be set out (paragraph 194) and where harm is less than substantial it should be weighed against the public benefits of the scheme (paragraph 196). Finally, paragraph 200 explains that LPAs should look for opportunities for new development within conservation area and within the setting of listed buildings that enhance or better reveal their significance. Specific local plan policies EN1,EN3,EN4 andEN5 are also relevant.

- 6.31 Achieving significant improvements for this area was the intention of the Minster Quarter Area Development Framework. Officers consider that the proposal will hugely improve the visual appearance of this area of the town centre where any harm to the heritage assets is outweighed by the public benefits of the proposal as described in this appraisal. In particular with substantial physical improvements to the public realm around Broad Street Mall and the Minster Quarter which can include the area directly adjacent to Grade I Reading Minster. The proposal also provides a good housing mix including 3 bed units and accessible units. The development has good energy credentials and will increase soft landscaping and the biodiversity of this town centre site. By regenerating the tired BSM site the proposal has the potential to be a catalyst for future development of the wider Minster Quarter Area. It is therefore considered, taking into account National legislation and Local Plan policies in relation to Heritage Assets, that the public benefits of the scheme, including substantial financial contributions secured by S106 in addition to the required CIL monies, outweigh the less than substantial harm to heritage assets.

#### Public Realm, Trees, Landscaping and Ecology, Recreation and Leisure

##### Public Realm

- 6.32 Policy CR3 requires proposals to make a positive contribution towards the quality of the public realm in the central area of Reading. Intrinsically linked to design matters are the open space/public realm and landscaping elements of the proposals that form part of the overall site. At street level the interconnection between the public realm within the application site and the remainder of the Framework Area, adjacent retail frontages and Conservation Areas beyond, is a fundamental consideration for officers.
- 6.33 Within the MQADF the 'Public Realm Parameters' set out that areas of open space and interconnecting public realm are to be well designed, functional, adaptable and capable of effective maintenance. These spaces must also be designed to ensure a vibrant, lively and thriving public realm. Also sought are enhancements to existing routes including Queens Walk and Dusseldorf Way to contain active multi uses spaces with high quality landscape. The application proposes resurfacing of both Queens Walk and Dusseldorf Way with brick paviours, however this material can be subject to condition if an alternative material is considered appropriate within the wider Minster Quarter Development Area. Landscaping in the form of trees, planters and hanging vegetation to enhance the appearance of the area is proposed that allows for pedestrian movement through the site whilst maintaining access for emergency vehicles. Additional active frontages in these areas are also proposed with new glazed shop fronts and on street seating to enliven these areas. The works to the public realm are therefore considered a significant positive enhancement of the scheme.
- 6.34 No specific works are shown to St Marys Butts and Oxford Road at this time. These areas are subject to additional constraints due to vehicular activity and public transport use in this area. The potential to alter the existing change in

gradient of the area adjacent to Block C, where it adjoins Hosier Street, is also sought to be retained within the proposed development. Additionally In relation to the wider public realm with the MQDBF area, including the setting of Reading Minster a further S106 contribution of £1,092,000 has been secured. This to ensure that further necessary works to the public realm can be carried out to mitigate the impact of increase residents which is considered to be a further additional benefit of the proposal.

- 6.35 The upper level amenity deck for proposed residents, and ‘greened’ elements of the car park are also visible and provide a positive contribution to the public realm for future residents and users of the car park at this level. It is noted that there is a requirement at present to retrain this car park and ensure manoeuvrability within it.

#### Trees, Landscaping and Ecology

- 6.36 Policy EN14 seeks new planting within the site to increase the level of tree coverage within the Borough an to contribute to biodiversity. In terms of the proposed soft landscaping works proposals have been amended in line with comments from our tree officer in particular in relation to appropriate tree species which are proposed within the site. Further comments and conditions in relation to approval of final planting specification details and maintenance details to be provided as an update report.

- 6.37 Policy EN12 seeks that development should provide for a net gain in biodiversity wherever possible. The existing site is of limited due to the existing built form and use of the building. Therefore to secure biodiversity enhancements further information has been submitted in the form of green roofs and mitigation/enhancement measures are being reviewed by the Council’s Ecological Consultant. This will be provided in the form of an update report.

#### Leisure and Recreation

- 6.38 Policy EN9 (Provision of open space) requires all new development to provide for the open space needs of the occupiers through either on or off-site provision, or through contributions towards the provision or improvement of leisure or recreational facilities. In areas with relatively poor access to open space facilities, Policy EN10 (Access to Open Space) stipulates that new development should make provision for, or contribute to, improvements to access green space. As set out above private amenity space has been provided in the form of upper podium level roof gardens, roof terraces and some balconies, which is welcomed. However due to the constrained nature of the site and number of units proposed the policy compliant levels of on-site play space cannot be accommodated. To mitigate this shortfall of provision against the Policy requirement (Policy EN9) a financial contribution of £633,000 is to be secured by way of a section 106 legal agreement. RBC leisure have identified that this would be put towards maintenance and improvement of existing play facilities / open space for example at Victoria Recreation Ground (to the rear of Great Knollys Street) which is approximately 700m away from the development site, and town centre leisure uses to cater for increased demand for these facilities generated by occupiers of the proposed development.

#### Amenity of Existing Occupiers

- 6.39 Policy CC8 (Safeguarding Amenity) and CR6 (Living in Central Reading) seeks to protect the amenity of existing surrounding occupiers. Policy EN16 (Pollution and Water Resources) seeks to protect surrounding occupiers from the impact of

pollution. Policy CR10 (Tall Buildings) also seeks that that new development ensures adequate levels of daylight and sunlight are able to reach buildings and spaces within the development and avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting.

- 6.40 The proposal site is separated from the majority of existing nearby properties by vehicular roads or Queens Walk which is primarily used by pedestrians. The closest residential relationship adjacent to the site is the McIlroy Building and Site E. Site E will be taller than the McIlroy Building with new upper floor windows orientated toward its frontage however there is a separation distance of approximately 18 m which is not considered to cause undue overlooking or overbearing in this town center site. In relation to Sites A, B and C although the height of these units are noted these are considered to be set a sufficient distance from residential units not to cause undue overlooking also taking into account the proposed roof top terraces. Matters of daylight and sunlight are assessed in detail below.
- 6.41 Sunlight and daylight: In terms of daylight and sunlight matters, the submitted information has been reviewed by independent consultants who agree the methodology and criteria for impact. The submitted daylight and sunlight assessment (within the Environmental Statement) identifies 12 relevant residential neighbouring buildings around the site that are likely to experience a material reduction in daylight and sunlight from the proposed development. St Mary's Episcopal Chapel, to the south, and the Penta hotel contains windows but these are not residential uses and therefore are not considered to require further detailed assessment.
- 6.42 **Daylight Analysis:** 9 of the 12 residential properties considered would meet the BRE criteria for VSC (Vertical Sky Component) and NSL (No Sky Line) resulting in a negligible effect. Therefore 3 properties would experience noticeable effects: McIlroys Building; 59-60 St Mary's Butts and 15 Queens Walk (Queens Court Student Accommodation).
- 6.43 McIlroys Building: The results demonstrate that 42% of the 197 windows serving 67 rooms assessed will not meet the BRE standard for reduction in VSC. However, paragraph 9.99 of the Submitted ES chapter states that of the 83 windows that would experience this minor to moderate adverse alteration in VSC (a 20%-39% reduction) 79 retain a VSC between 19% - 26.9%, with the remaining 4 windows retaining a VSC between 14-15%. Since the Whitechapel Estate appeal (Tower Hamlets London Borough Council, Ref: APP/E5900/W/17/3171437) more emphasis has been placed on retained daylight levels, rather than reductions from baseline figures. In the Whitechapel appeal, the Inspector noted that evidence submitted by the applicant showed that *"a proportion of residual VSC values in the mid-teens have been found acceptable in major developments across London [which] echoes the Mayor's endorsement in the pre-SPG decision at Monmouth House, Islington that VSC values in the midteens are acceptable in an inner urban environment."* A noticeable adverse effect might therefore be considered acceptable if, in an urban area like London, a proportion of retained daylight levels would be in the midteens for VSC, with a smaller proportion in the bands below 15% VSC. It is noted Reading Borough is not London but this town centre application site can be classed as an urban location. The BRE guide specifies in Appendix F.F1 that alternative values may be used 'based on the special requirements of the proposed development or its location' and therefore this approach has been considered by officers and is considered acceptable on this basis.



- 6.44 The NSL results demonstrate that 2 (3%) of the 67 rooms assessed will not meet the BRE standard. These rooms experience reductions of 21% and 22% respectively which is considered to be a minor adverse impact and therefore considered acceptable by officers.
- a. The submitted assessment also considers the potential cumulative impacts caused by the recently consented hotel development on Hosier Street (application number: 182054). The results demonstrate that 1 additional window within McIlroys Building will experience a minor adverse impact in VSC terms. The NSL and sunlight results do not alter.
- 6.45 The impact on 59-60 St Marys Butts is considered to be negligible to minor adverse.
- 6.46 In relation to 15 Queens Walk The results demonstrate that 35 (14%) of the 250 windows assessed will not meet the BRE standard for reduction in VSC. Of these, 33 will experience a minor adverse impact and 2 will experience a major adverse effect. As set above if retained daylight to these rooms is considered this illustrates VSC figures between 15-19% to 19 windows and NSL values of 75% or above to a further 11 rooms. The NSL results demonstrate that all 186 rooms assessed will meet the BRE standard. It is therefore considered that the impact on daylight to this building to be minor adverse with 2 isolated instances of major adverse which is acceptable due to the nature of this building as student accommodation.
- 6.47 **Sunlight Analysis:** 9 of the 12 properties identified above would qualify for sunlight analysis. 5 would meet the BRE criteria for APSH (Annual Probable Sunlight Hours) and experience a negligible effect. Therefore, the following 4 properties would experience noticeable effects: 38 Oxford Road, McIlroys Building, 61-62 St Mary's Butts and 15 Queens Walk (Queens Court).
- 6.48 38 Oxford Road: The results demonstrate that 8 (9%) of the 92 windows assessed will not meet the BRE standard for APSH. Of these, 5 will experience a minor adverse impact and 3 will experience a moderate adverse impact. 25 (27%) of the windows assessed will not meet the criteria for winter sun. Of these, 4 will experience a moderate adverse impact and 21 will experience a major adverse impact. However, it is important to note, that the low levels of existing winter sun lead to magnified percentage reductions when the actual alteration in sunlight is not large. Of the windows experiencing adverse impacts, some are located within kitchens and bedrooms which have a lower requirement for sunlight. In addition, some windows give light to rooms which benefit from multiple windows. Therefore, it is considered that the impact on sunlight to this building to be moderate adverse.
- 6.49 McIlroys Building: The results demonstrate that 19 (10%) of the 197 windows assessed will not meet the BRE standard for APSH. Of these, 7 will experience a minor adverse impact, 6 will experience a moderate adverse impact and 6 will experience a major adverse impact. 11 (6%) of the windows assessed will not meet the criteria for winter sun. However overall, we consider the impact on sunlight to this building to be moderate adverse.
- 6.50 61-62 St Mary's Butts: The results demonstrate that 2 (20%) of the 10 windows assessed will not meet the BRE standard for winter sun and will experience a minor adverse impact. The percentage reduction is magnified by low levels of

existing winter sun with both windows experiencing a change of 1% from the existing condition. All of the windows will meet the criteria for APSH. We consider the impact on sunlight to this building to be negligible to minor adverse.

- 6.51 15 Queens Walk (Queens Court): The results demonstrate that 10 (10%) of the 105 windows assessed will not meet the BRE standard for APSH. Of these, 5 will experience a minor adverse impact and 5 will experience a major adverse impact. All of the windows will meet the criteria for winter sun. Of the windows experiencing adverse impacts, some are located within bedrooms which have a lower requirement for sunlight. In addition, some windows give light to rooms which benefit from multiple windows. We consider the impact on sunlight to this building to be minor adverse but considered to be acceptable due to the student occupation of this building.
- 6.52 Overshadowing: A shadow analysis has been undertaken for the 6 off site amenity spaces that have been identified around the development. The study has been carried out with the consented hotel development on Hosier Street (application number: 182054) in place as a 'worst case scenario' however the hotel itself does not cause any additional impact to the amenity areas highlighted. The results demonstrate that all these areas (areas 1-6) will meet the BRE criteria for overshadowing and will achieve the recommended 2 hours of sunlight to at least 50% of their area.

#### Amenity of Future Occupiers

- 6.53 Policies H5 (Standards for New Housing) seeks that all new build housing is built to high standards. In particular new housing should adhere to national prescribed space standards, water efficiency standards above building regulations, zero carbon homes standards (for major schemes) provide at least 5% of dwellings as wheelchair user units. Policy EN16 (Pollution and Water Resources) seeks to protect future occupiers from the impacts of pollution. Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space.
- 6.54 The internal layout of the proposed residential units is considered to create a high standard of living accommodation. The scheme, following comments from Design South East has been amended to improve the quality of accommodation by the deletion of all north facing single aspect units and the entirety of the Block D. In relation to the nationally prescribed space standards all of the proposed 1 bed units within Site A, B and C exceed the minimum threshold (39 sq m); the two bed units which do not meet the standard of 61sq m are well laid out with suitable outlook and natural ventilation; and the three bed units are generous in size with a private terrace or balcony. The internal layout of Block E has been amended to reduce the number of units to ensure all accommodation meets the national space standards and the 3 bed units provide the 3bed 5person floor area of 86 sqm. The scheme is also considered in relation to the Build to Rent nature of the units and the high density town center nature of the site. The supporting text of Policy H5 (4.4.39) sets out that there are existing well regarded development schemes in Central Reading that do not meet these space standards therefore the proposals are considered to be acceptable.
- 6.55 Additionally, all of the residential units have been designed to meet Part M requirements with 22 of the residential units designated as fully accessible. Street level access is provided for all sites along with compliant passenger lifts. Level access to the proposed Amenity Deck between Block A, B and C will also be

provided. The proposed amenity deck and roof garden to block E are considered to provide innovative, amenity space consisting of a mix of elements to enable the space to meet the requirements of differing types of residents. The building will create degrees of overshadowing to the amenity deck at differing times of year however this is symptomatic of tall building in an urban context and is considered to be acceptable. All units are linked to suitable supporting facilities (waste storage / cycle storage) in the reconfigured basement area. The proposal is therefore considered to be acceptable in this respect.

- 6.56 In relation to overlooking between the proposed units within the application site, there is a minimum separation distance of 23m between the east and west elevations of Site A-B and Site B-C. There is also a separation distance in excess of 45m between Site C and Site E. Factoring in the relative height of the proposed building this is considered to be acceptable to prevent undue overlooking between the proposed units. In relation to overlooking from existing buildings there is a separation distance of 18m from Fountain House which is in office use to site A (and 80m to Site E) which is considered to be acceptable. In relation to existing buildings to the west of the site (15 Queens Walk and the Penta hotel) and east (St Mary's Butts) due to the separation distance, relative orientation and use are not considered to cause overlooking to Site A.
- 6.57 In relation to day light and sunlight assessments the applicant has undertaken a VSC façade analysis to test for the potential of daylight to the outside face of the proposed Blocks; and APSH façade analysis has also been carried out to assess the potential of sunlight to those elevations facing within 90° of due south. A full ADF and APSH assessment could have been undertaken as this is a fully detailed planning application however the results do suggest that the proposed units will receive good levels of daylight and sunlight and we would expect the majority of units to meet the recommended levels therefore further detail surveys have not been required. As VSC figure in excess of 20/25%, with large areas appearing to receive up to the maximum 40%. This implies that the proposed units will generally receive good levels of daylight. Drawing numbers BRE/436 - BRE/441 indicate that the majority of the proposed south facing elevations will receive at least the minimum recommended 25% APSH and 5% winter sun. A small area on the lower floors of Block C see lower levels due to being located opposite the Hosier Street proposed hotel development, but the assessment implies that the proposed units will generally receive good levels of sunlight. Taking these factors into account the day/sunlight provision in overall terms for future occupiers is considered adequate for the scheme as a whole.
- 6.58 In respect of air quality, noise and disturbance matters; the noise assessment concludes that standard thermal double glazing and whole house ventilation will provide suitable noise insulation for the development which is considered acceptable. Noise from a single existing fan in relation to Block E is noted and can be dealt with by condition as it is within the application site and applicant's ownership. Therefore, officers are content with the information submitted, subject to a pre-commencement construction method statement, including noise and dust measures and applicable to future occupiers owing to the phased nature of the scheme. A number of noise, contaminated land / land gas (reiterated by the Environment Agency) hours of works and no bonfire based compliance conditions are also recommended. Environmental Protection Officers also advise that the assessment submitted in respect of air quality demonstrates that the proposed ventilation scheme would ensure suitable air quality standards within the units. Implementation of both noise and air quality measures detailed are recommended to be secured by conditions.

- 6.59 The impact of the upper podium level car park has also been carefully considered by officers. The proposed residential units and amenity space is suspended above the existing car park with the majority of views from residential units across the proposed amenity space or outward looking from the site. The application proposes green elements and planting with the car park to be retained which is considered to break up and soften its visual impact. It is also characteristic of residential development to have parking in proximity to dwellings which is not considered to result in undue noise and disturbance in this town center location. It is also noted that the proposed layouts propose podium courtyards within each three blocks, which potentially could result in noise and disturbance to future occupiers from activities taking place however this is restricted to use by residents only and is beneficial to the scheme.
- 6.60 In terms of the proximity of future occupiers to non-residential uses, conditions will limit some of the uses proposed (e.g.A4 uses to be ancillary), hours use a delivery/service management plan, the non-provision of plant/kitchen extraction until suitable assessments have been undertaken. With these conditions secured, noise and disturbance will be minimized as far as is reasonable for future occupiers.
- 6.61 Assessment of microclimate / wind impacts of the proposed development on future occupiers (and also nearby occupiers / future users of the area), was submitted by the applicant to assess thoroughfare locations (car park, Queens Walk, Hosier Street and Dusseldorf Way) building entrances and amenity areas such as the amenity deck and terraced in the residential towers.
- 6.62 This information has been subject to independent review by NOVA on behalf of the Local Planning Authority and further clarification has been submitted by the applicant. Following a review of the responses provided, NOVA have confirmed that the conclusions presented in the ES are reasonable and robust within the boundaries of best practice for wind microclimate assessments within the UK and relevant components of the corresponding policies adopted by Reading Borough Council. It should be noted that soft landscaping has been assessed within the wind tunnel and the final landscaping will be secured through a planning condition; and that the applicant has identified that all adverse effects will require mitigation, which is deemed appropriate; and NOVA would reiterate that whilst the assessment of recreational spaces in summer only is common practice for outdoor seating areas, general amenity would more commonly be assessed across spring & autumn as well. Notwithstanding the above, the applicant is current undertaking further wind tunnel testing to address the outstanding issues, including the assessment of the private balconies, and in particular the eight locations where strong winds persist. NOVA would support the recommendation that further wind tunnel testing is conducted to demonstrate that safe and amenable wind conditions can be secured across the site.
- 6.63 With regard to crime and safety issues the proposals have been reviewed by the Thames Valley Police Crime Prevention Disorder Advisor who made a number of recommendations which have been taken on board by the applicant in the proposed plans. This includes a condition in relation to access to the residential units and also approval of a security strategy to cover issues such as CCTV.
- 6.64 Although fire safety is not a material planning consideration, the application includes details of the fire strategy for the development. This sets out that the proposals would accord with the fire safety requirements (Part B) of the Building

Regulations 2010. Along with other measures, due to the height of the Tall buildings and depth of block E sprinklers will be installed.

- 6.65 Future occupiers of the indicative new development to the south of the application site within the MQADF, subject to their detailed design, are not considered to be prejudiced by the proposed development. In overall terms it is considered that the proposals would provide a high standard of amenity for future occupiers.

#### Transport

- 6.66 Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking related matters relating to development
- 6.67 Pedestrian Access to Residential and Commercial uses:  
The residential accesses for Sites A, B, C and E are deemed acceptable. The application scheme includes improvements to the pedestrian route between Hosier Street and Dusseldorf Way however clarification is sought in relation to proposed scheme to confirm that there is no negative impact the surrounding footway improvements/ future regrading secured through the adjacent planning permission. Further information is sought on this matter.
- 6.68 The proposed units along Dusseldorf Way include the provision of seating to the frontage and this has been deemed acceptable and is consistent with planning consent 190099. The resurfacing works are considered to be acceptable subject to licensed being undertaken to adoptable standards. The applicant has however stated that the details of the external lighting will be developed and fully coordinated with the proposed trees positions. Detailed drawings will be prepared to discharge a planning condition and officers are satisfied that this is an acceptable control. Queens Walk is a pedestrianized area with limited vehicular access with no legal access point is provided from Oxford Road to the north. To aid access to Queens Walk for the current maintenance requirements this application should include the provision of a new vehicular access from the Oxford Road. The provision of this access is feasible and can be required by condition.
- 6.69 Trip Rates: An appropriate TRICS assessment has been undertaken and given that the number of trips is not a material increase no junction assessments would be required and there is no objection on this basis.
- 6.70 Car Parking for the Development: The proposal includes the provision of 22 accessible car parking spaces for the residential units which are located on the top floor of the car park adjacent to the entrances of each Tower. However, no details have been submitted confirming how they will be managed in terms of allocation and avoiding abuse by the other users of the multi-storey car park. Therefore, a management plan would be required and this would also need to be secured through the S106 (as it would require consent from Reading Borough Council as operator of the Broad Street Mall Car Park). Visitor car parking is available within the existing public car park.
- 6.71 It is noted that drawing 'Site E - Oxford Road - 2nd Floor Plan Rev P03' identifies the location of the pillars for the floors above however it is still believed that one of the pillars will obstruct the parking bays located south of the existing

vehicular ramp. This is unacceptable and revised layouts will be required or tracking diagrams will need be provided to demonstrate that a vehicle can enter and exit these spaces. Given that the proposal includes a revised layout these altered parking bays must comply with current design standards. **Further information sought on this matter.**

Cycle Parking: All the cycle parking has been proposed within the basement level of the car park apart from Site C which is located at second floor level within the car park. The scheme has been changed so that to access the cycle parking bicycles would have to be transported up or down the lift. Transport officers raise a concern that this would not be ideal for residents and would not comply the NPPF para 110 that asks that applications for development should:

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;*

The applicant has stated that the loss of retail space at ground level to accommodate cycle parking is unviable. Retaining commercial use at ground level also helps maintain an active frontage along Dusseldorf Way and Queen's Walk in particular, which are the least active currently. It is considered on balance therefore that the proposed location of the cycle store and access to it for residents is reasonable within the context of the physical and operational constraints of the existing mall. The specification of these cycle parking facilities can be secured by condition to be of a high standard to encourage their use and a condition is needed to manage the provision of cycle parking facilities for the commercial uses.

Servicing: Further technical information is sought to clarify servicing and refuse collection within the basement area and in relation to proposed retail unit 02 and block C to ensure a route through the basement is acceptable.

Impact on Multi-Storey car park: It is now stated that 87 spaces would be lost with a further 22 spaces allocated to the residential development resulting in a total reduction of 109 spaces from the multi-storey car park and in principle this is deemed acceptable from a planning point of view. The parking layout will be affected by the provision of the central cores and revised drawings have now been submitted identifying the wider impacts to the car park layout. These have been reviewed and further detailed information has been sought in order that any implications for car parking can be fully assessed. However the further concerns raised relating to future car park management are matters that need to be resolved between the developer and the car park manager not being a significant material planning consideration.

- 6.72 The proposals are considered to be acceptable in principal terms subject to further technical clarification prior to determination and subsequent recommended conditions and section 106 heads of terms.

### Sustainability

- 6.73 Policies H5 (Standards for New Housing) seeks that all new building housing is built to high standards. In particular new housing should adhered to national prescribed space standards, water efficiency standards above building regulations, zero carbon homes standards (for major schemes) provide at least 5% of dwellings as wheelchair user units. Policy CC2 (Sustainable Design and Construction) and CC3 (Adaption to Climate Change) seeks that proposals should incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should

consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.

- 6.74 The adopted SPD (par 3.34) sets out applicants should use the current Building Regulations methodology for estimating energy performance against Part L 2013 requirements as set out in Policy H5 but with the outputs manually converted for the SAP 10 emission factors. The revised scheme was reassessed on this policy basis and submitted report consider information submitted demonstrates that the proposals would achieve zero carbon homes standards in achieving a 35% improvement over 2013 Building Regulations Standards using carbon factors of SAP 10; and additionally providing a carbon off-setting contribution equivalent to £1, 800 per tonne of carbon. The building regulations improvement would be secured via use of highly efficient building materials as well as a Waste Water Heat Recovery System. The applicant has agreed to the principle of providing the carbon off-setting contribution within the S106.
- 6.75 The supporting information includes a revised Sustainability Statement, (including BREEAM Pre- Assessment); Energy Strategy in relation to the new residential units; and a BREEAM New Construction Pre-Assessment Report for the new build retail element of the scheme (ground level of Block C). This area is less than 1,000 sq m and is therefore required to meet a BREEAM rating of 'Very Good'. These reports follow the most recent policies and Sustainable Design and Construction SPD guidance applying the recognised energy hierarchy of 'be lean', 'be clean' and 'be green'. This has been achieved with the design of the building incorporating high standards of insulation to minimise energy use and using low carbon technologies.
- 6.76 In terms of decentralised energy the applicant has set out that the proposed building services strategy utilises an all electric approach ie for heating and hot water. They have specified therefore that the use of Combined Heat and Power is not feasible as there is no thermal demand; and the use of gas CHP is not considered to offer any carbon savings. The use of decentralised energy is therefore not considered to be suitable, feasible or viable for this form of energy provision.
- 6.77 On balance, with the carbon offset contribution, officers are satisfied that the proposals demonstrate a good standard of sustainability and in particular adhering to zero carbon homes standards is considered to be a positive benefit of the scheme.

#### Flooding

- 6.78 Local Plan Policy EN18 (Flooding and Sustainable Drainage Systems) notes that development will be directed to areas at lowest risk of flooding in the first instance, and it is confirmed the site is in an area designated as Flood Zone 1 classified as 'low' risk of surface water flooding. However due to the size of the application site the proposal is accompanied by a Flood Risk Assessment in accordance with policy. A sustainable drainage strategy (SuDs) has also been submitted as part of the application. This has been reviewed by the Local Flood Authority and as amended is considered acceptable subject to conditions to secure a timetable for its implementation and details of management and maintenance of the scheme and it implementation in accordance with the approved details. The Environment Agency raises no objection to the proposed development but has required conditions in relation to contaminated land and details of any piling.

### Archaeology, Phasing and Environmental Statement

- 6.79 Berkshire Archaeology is content with the information within the Environmental Statement and recommends a pre-commencement condition. This will require a programme of archaeological work to be secured and implemented on-site, in accordance with the approval of a written scheme of archaeological investigation.
- 6.80 The submitted phasing plan identifies that the retail element of the mall is to remain open and the development constructed in two phases. Phase 1 as Blocks A, B and C and Phase 2 as block E. This will be secured via condition mindful of the provision of affordable housing in Blocks E and can also be referenced in conditions, in relation to the timing of the submission of details.
- 6.81 The application is accompanied by an Environmental Statement which has been assessed as part of this report. The Environmental Statement is considered to be sufficiently comprehensive to allow assessment of the likely impact of the development on the site and its surrounds. In addition to those matters already assessed in this report socio-economic effects have also been assessed by the applicant. Overall the proposal is considered to have a beneficial effect locally on the population and the labour market. The additional demand on social infrastructure including education and health services mitigation can be provided though the CIL contribution generated by the development.

### S106 and Other Matters

- 6.82 Policy CC9 provides for necessary contributions to be secured to ensure that the impacts of a scheme are properly mitigated. It is considered that each of the obligations referred to above would comply with the National Planning Policy Framework and Community Infrastructure Levy (CIL) in that it would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development.
- 6.83 In addition to the matters referenced above in the appraisal to be secured via s106 legal agreement, it is also considered necessary to secure a construction Employment Skills and Training Plan via s106 . This could be in the form of a site specific plan or equivalent a financial contribution. As such, the s106 will secure this in a flexible manner covering both options. As such, the s106 will secure this in a flexible manner covering both options, to enable post-planning discussions between the applicant and Reading UK CIC.
- 6.84 Equality - In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

### Matters Raised in Representations

- 6.85 All matters raised are considered to be covered within the appraisal section above.



## 7. Conclusion

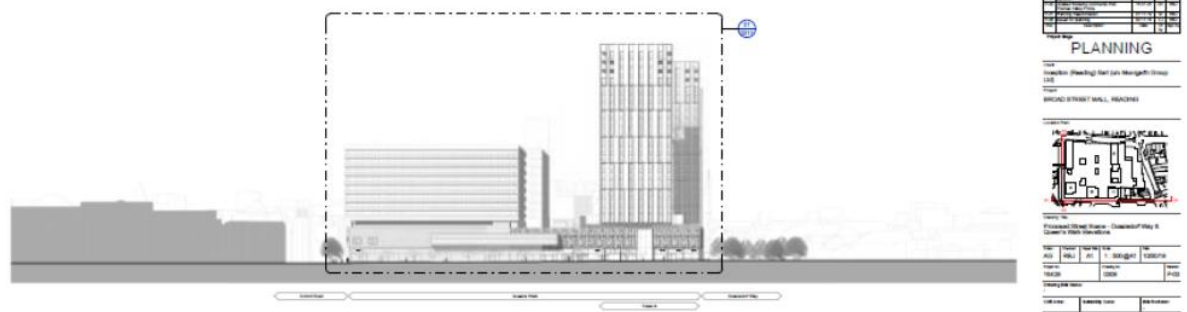
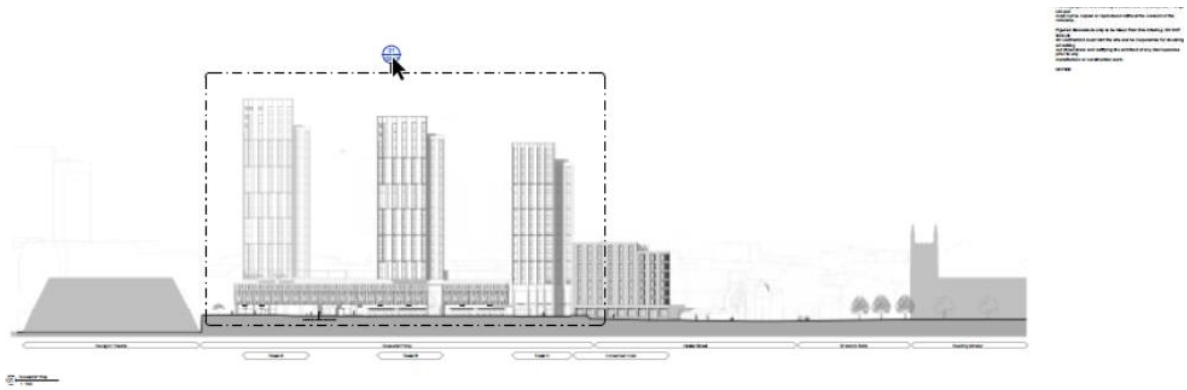
The development proposes tall buildings within the Western Area Tall Building Cluster as designated within the newly adopted Local Plan. The Blocks A, B and C are sited in locations specifically identified for tall buildings at the prescribed maximum height within the adopted Minster Quarter Area Development Framework. The acceptability of any tall building is subject to further detailed design criteria in particular in relation to the impact on Heritage Assets but this impact should be weighed against the public benefits of the scheme. Officers have fully assessed all material considerations and find that the critical planning balance of the benefits outweigh the potential conflicts. As such, you are recommended to grant full planning permission, subject to no substantial new objections following re-consultation and responses on wind mitigation, the recommended conditions and completion of the S106 Legal Agreement.

### Drawings and Documents Submitted:

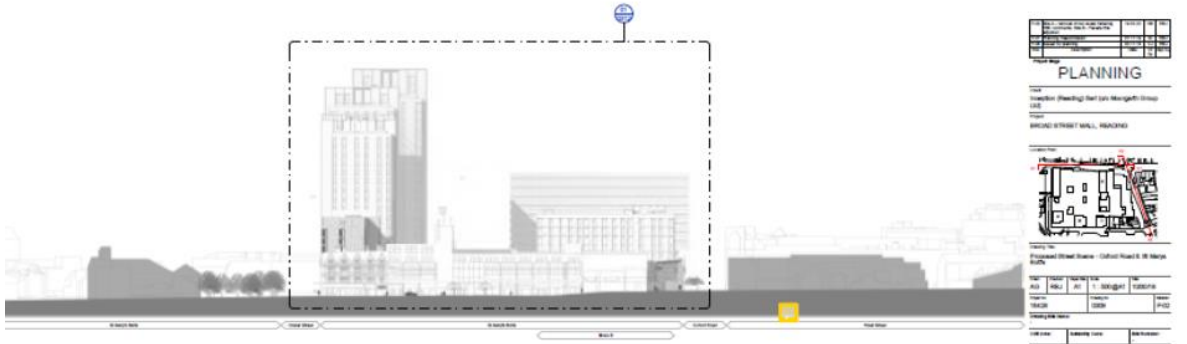
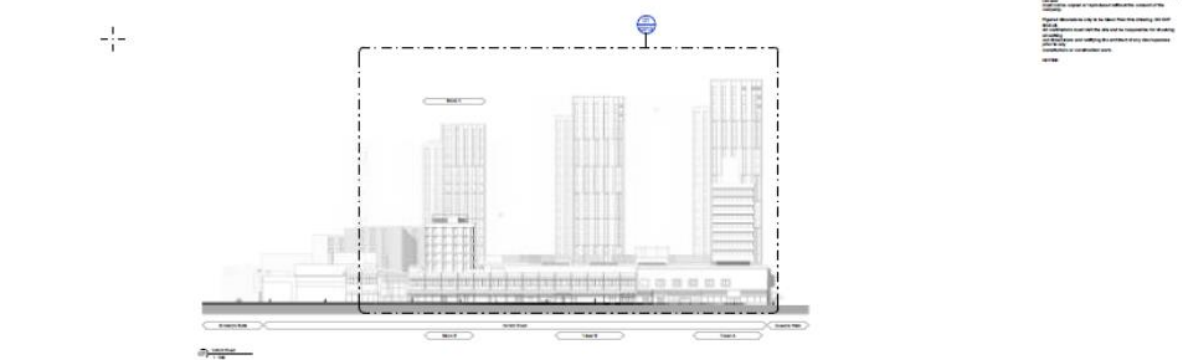
DATE OF ISSUE	DAY	30	12	13	31	01	02	07	15	10	19
	MONTH	11	12	12	01	02	04	11	01	02	02
	YEAR	18	18	18	19	19	19	19	20	20	20
DRAWING TITLE	SIZE	DWG No.	REVISION								
Site Location Plan	A3	0200	P-00			P-01			P-02		
Existing Basement Level	A1	0210	P-00					P-01		P-03	
Existing Ground Level	A1	0211	P-00					P-01			
Existing First Floor Level	A1	0212	P-00					P-01			
Existing Podium Floor Level	A1	0213	P-00					P-01			
Existing Second Floor Level	A1	0214	P-00					P-01			
Existing Dusseldorf Way & Queens Walk Elevations	A1	0215	P-00					P-01			
Existing Oxford Road & St Mary's Butts Elevations	A1	0216	P-00					P-01			
Proposed Masterplan - Site Plan	A1	0300	P-00	P-01		P-02		P-03			
Proposed Masterplan - Basement	A1	0301	P-00			P-01		P-02			
Proposed Masterplan - Ground Floor	A1	0302	P-00			P-01		P-02	P-03		
Proposed Masterplan - First Floor	A1	0303	P-00			P-01	P-02	P-03			
Proposed Masterplan - Podium	A1	0304	P-00			P-01	P-02	P-03			
Proposed Masterplan - Second	A1	0305	P-00			P-01	P-02	P-03			
Proposed Masterplan - Amenity Level	A1	0306	P-00	P-01		P-02		P-03			
Proposed Masterplan - Typical Level	A1	0307	P-00	P-01		P-02		P-03			
Proposed Street Scene - Dusseldorf Way & Queens Walk Elevations	A1	0308	P-00					P-01	P-02		P-03
Proposed Street Scene - Oxford Road & St Mary's Butts	A1	0309	P-00					P-01			P-02
Proposed Elevation - Dusseldorf Way	A1	0310	P-00					P-01	P-02		P-03
Proposed Elevation - Queen's Walk	A1	0311	P-00					P-01	P-02		P-03
Proposed Elevation - St Mary's Butts	A1	0312	P-00					P-01			P-02
Proposed Elevation - Oxford Road	A1	0313	P-00					P-01			P-02
Proposed Site Sections	A1	0314	P-00					P-01			P-02
Proposed Residential Entrances - Tower A	A1	0315	P-00					P-01	P-02		
Proposed Residential Entrances - Tower B	A1	0316						P-00	P-02		
Existing Car Park Layouts	A1	0330									P-00
Proposed Car Park Layouts	A1	0331						P-00			P-01
Site A - Basement Plan	A1	0400	P-00					P-01			P-02
Site A - Ground Floor Plan	A1	0401	P-00				P-01	P-02	P-03		
Site A - First Floor Plan	A1	0402	P-00				P-01	P-02			
Site A - Podium Floor Plan	A1	0403	P-00				P-01	P-02			
Site A - Second Floor Plan	A1	0404	P-00				P-01	P-02			P-03
Site A - 3rd Floor Plan (Amenity Level)	A1	0405	P-00	P-01		P-02		P-03			



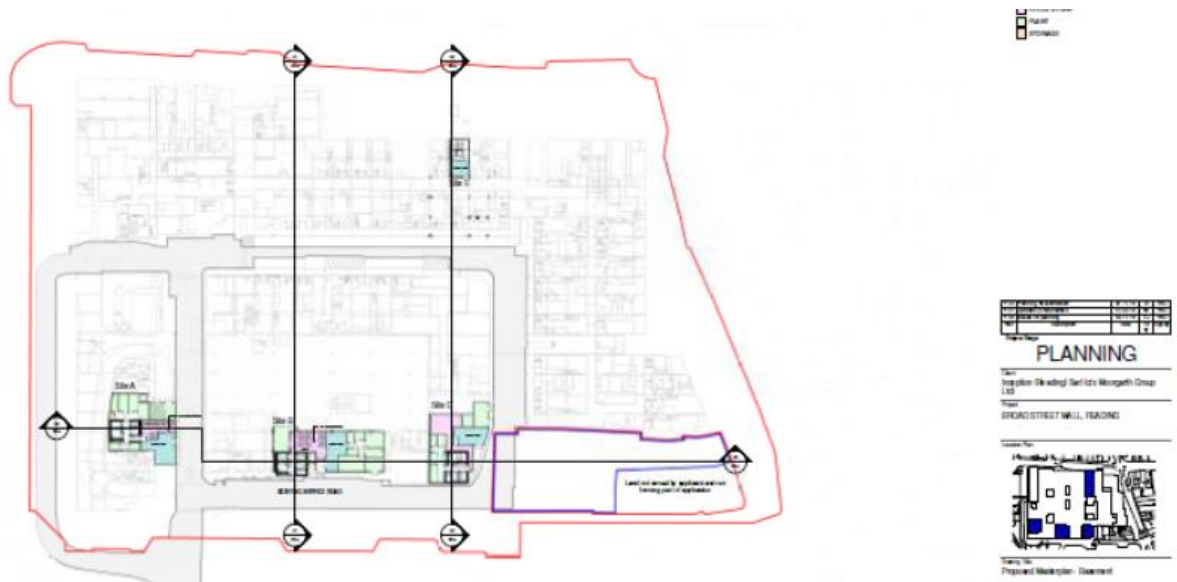




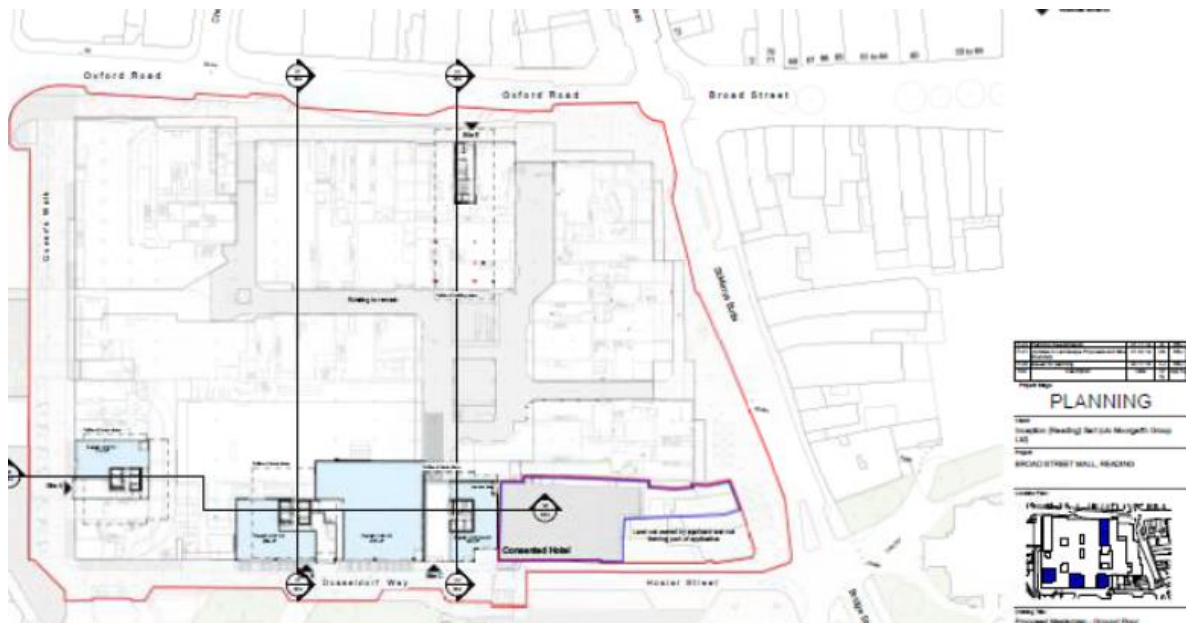
Proposed Dusseldorf Way and Queens Walk Elevations



Proposed Oxford Road and St Marys Butts Elevations



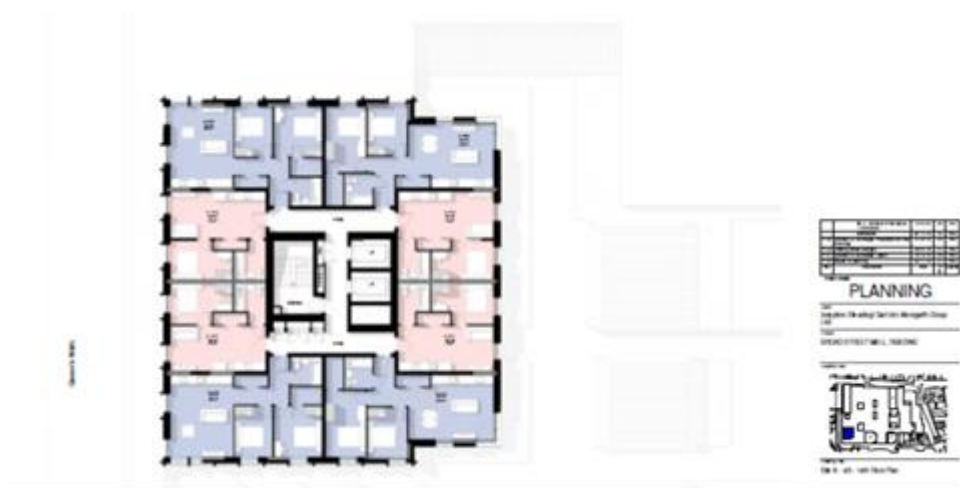
Proposed Master Plan Basement Level



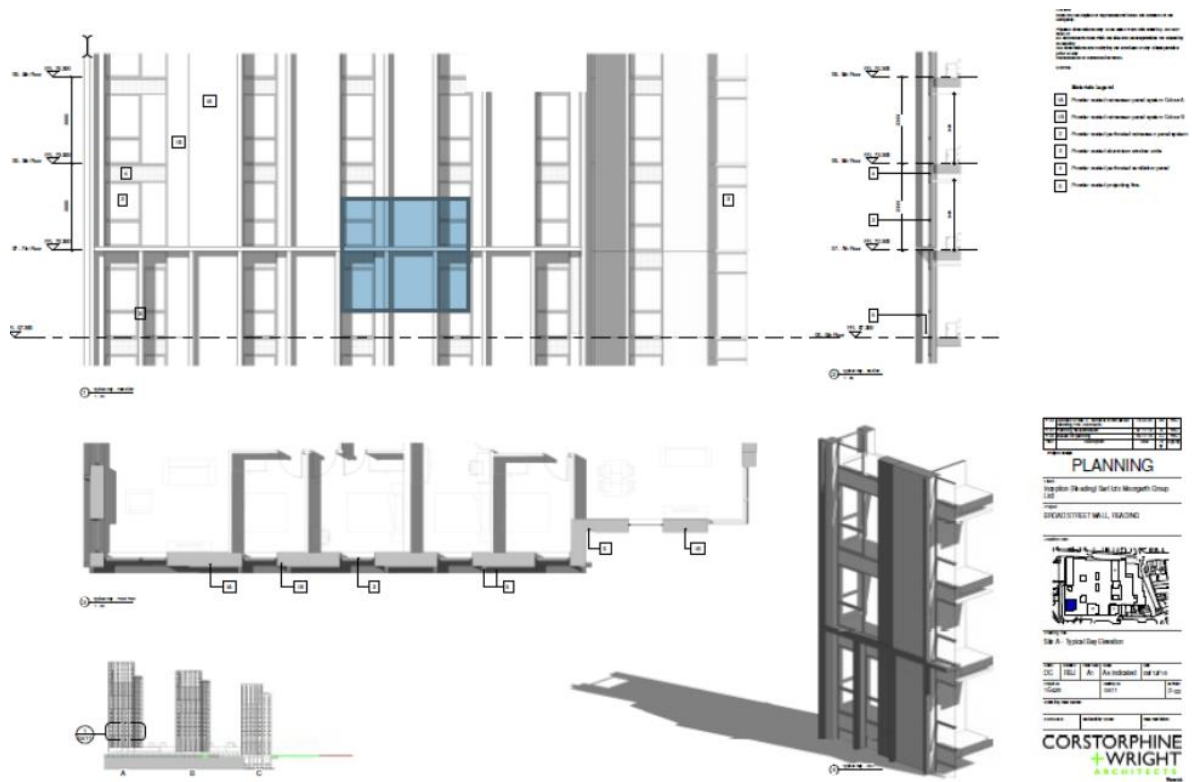
Proposed Master Plan Ground Floor



Proposed Master Plan General Layout



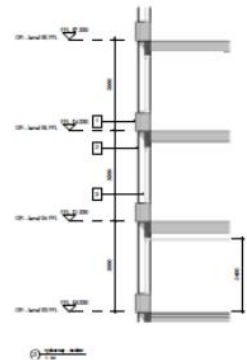
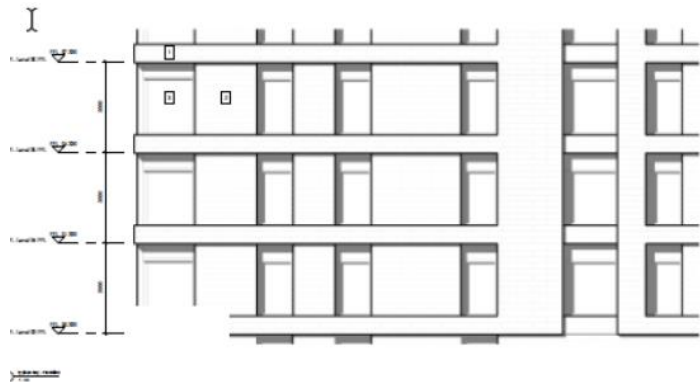
Site A Typical Floor Plan Layout



Site A Typical bay elevation

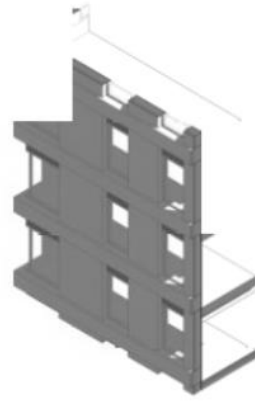
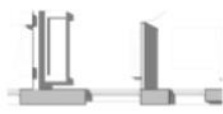
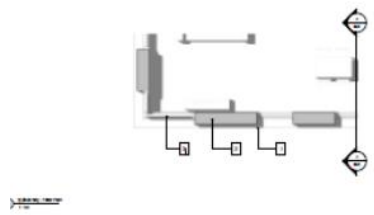


Site E Typical Floor Plan Layout



Notes:  
 1. All dimensions are in millimeters.  
 2. All dimensions are to the face of the member unless otherwise stated.  
 3. All dimensions are to be confirmed with the manufacturer.  
 4. All dimensions are to be confirmed with the manufacturer.

- Concrete Cladding System
- Concrete Cladding System
- Concrete Cladding System



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Site E Oxford Road Elevation - Bay Elevation Details